

# **EiP Statement**

## **Central Lancashire Local Plan**

### **Rowland Homes Limited**

#### **Representor ID A41**

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**Our ref** 67650/04/BOC/AKn  
**Date** 6 November 2025

#### **Subject Matter 7 – Housing Policies**

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#### **1.0 Introduction**

- 1.1 Lichfields is instructed by Rowland Homes Limited ('Rowland') to make representations on its behalf to the Central Lancashire Local Plan ('CLLP').
- 1.2 This statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 4 Examination in Public ('EiP') hearing sessions.
- 1.3 Separate representations have been submitted in respect of the following matters:
- 1 Matter 2 – Spatial Strategy Policies
  - 2 Matter 4 – Strategic Sites and Mixed Use Allocations
  - 3 Matter 14 – Sustainable Travel, Infrastructure and Delivery and Monitoring
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the CLLP (Representor ID A41) as well as those made on other Matters listed above. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework ('NPPF') (December 2023) and the National Planning Practice Guidance ('PPG').
- 1.5 Rowland has an active interest in the site at Bagganley Lane, Chorley (allocation reference EC5.3) which has been identified for a mixed-use allocation in the CLLP.
- 1.6 Rowland is highly supportive of the draft mixed use allocation EC5.3 – Land at Bagganley Lane, Chorley and is committed to the development of the residential element of this allocation. Rowland recently submitted a full planning application in relation to the residential element of the allocation site which was validated on the 21st October 2025 (ref. 25/00907/FULMAJ). Rowland is committed to the fast delivery of this element of the allocation site which will make a significant contribution to the market and affordable housing needs of Central Lancashire and Chorley.

## 2.0 Planning Issues

### Matter 7 – Housing Policies

#### (Policies HS5 – HS13)

#### **Issue – Does the Plan set out positively prepared housing policies which are justified, effective and consistent with national policy?**

*7.1 a) are the requirements in Policy HS5 for the provision of open space and playing pitched by housing developments justified by robust and up-to-date evidence? Is there convincing evidence that the open space requirements can be viably provided?*

- 2.1 Part 3 of Policy HS5 (Open Space and Playing Pitch Requirements in New Housing Developments), requires provisions to be made in accordance with the standards set out in the Policy’s accompanying table.
- 2.2 The table within Policy HS5 sets out the number of hectares of each typology of open space per 1,000 and there are considerable variations between the three authority areas. Chorley is required to provide 6.51ha of natural and semi-natural greenspace per 1,000 population which is a stark contrast with South Ribble’s requirements of 1.80ha. It is not clear from the evidence presented by the Council how the figures in this Policy have been derived and there is no reference to the existing context of a development site’s proximity to existing open space typologies.
- 2.3 The evidence base released to support this policy on open space includes the Central Lancashire Playing Pitch Strategy (2018), the Chorley Council Open Space Study (2019) and Central Lancashire Open Space Assessment Report (2019). The only justification for the approach being used by the Council is that *‘the recommendation for open space is for the current provision levels to be used as the recommended quantity standards for Chorley’* (page 12 of the Chorley Council Open Space Study). This justification that current levels should be used to inform future levels is not considered to be robust or appropriately justified. Current provision being high does not automatically correlate into there being a similar need for future development, particularly when the current provision is disproportionately high.
- 2.4 Furthermore, on natural and semi-natural open space for example, the Central Lancashire Open Space Assessment concludes that the existing provision in sub areas Chorley East and Chorley Central is well in excess of the FIT standards and there is no underlying issue relating to this open space typology in Chorley.
- 2.5 The quantum of open space per typology set out in Policy HS5, is not justified by robust and up-to-date evidence. It has not been made clear by the Council in their evidence base why the figures set out in previous adopted policies have been moved away from.
- 2.6 The Council has not provided convincing evidence that the open space requirements can be viably provided. Ultimately, the quantum of land required for each typology will reduce the developable area of each site and significantly have a direct impact on the cost per dwelling

for developments in Chorley as the additional land will need to be purchased by the developer and managed by future residents.

- 2.7 Not only that, as set out at Page 24, the Viability Report has adopted a blended rate of open space contributions across the Central Lancashire authorities to factor into the Viability Assessment (£2,339). This is significantly lower than the cost per dwelling for Chorley (£3,303). As such, it is not considered that the Viability Report, which averages open space contributions across Central Lancashire, has properly evidenced whether off-site open space contributions in Chorley are viable.
- 2.8 Furthermore, Step 3 of the Council's approach at 4.28 states that '*costs for the typologies of open space in the table below have been calculated per dwelling using average costs per m2 rounded to the nearest pound for each typology*'. Although it also states that the costs per dwelling varies for each authority as the standards are different, this does not justify why the cost per dwelling for natural/semi natural greenspace in Chorley is three times more expensive than the same typology in Preston and South Ribble. No calculations have been provided in the evidence base to clearly set out where these figures have been derived.

*7.2 a) Does Policy HS6 provide an effective framework for ensuring an appropriate mix of housing will be delivered over the plan period? Does it provide sufficient flexibility to ensure site specific considerations are taken into account?*

- 2.9 To support Policy HS6, Central Lancashire has prepared three Housing Need and Demand Assessments published in 2024.
- 2.10 Rowland has concerns with the market mix ranges provided at table D6 - D8 of Central Lancashire's three HNDAs and considers that additional flexibility should be provided within the Policy by presenting the mix as wider ranges which allows site-specific considerations to be taken into account.
- 2.11 Rather than apply a very prescriptive approach to each sub-area of the three LPAs, site specific considerations should also be a material consideration for a site's proposed housing mix whilst being in broad alignment with the recommendations in the Housing Needs Demand Assessments. For example, factoring local market considerations and the site's proximity to schools and other community services when formulating an appropriate housing mix. This will ensure that future development responds to the specific needs of a local area and does not compromise appropriate site-specific housing mixes from coming forward in Central Lancashire.

*7.2 b) Are the requirements relating to the provision of homes that comply with M4(2) and M4(3) of the building regulations justified by evidence relating to need and viability and are they consistent with national policy? Would it ensure the needs for specialist housing will be met over the plan period?*

- 2.12 It is considered that the blanket requirement for all new properties to be built to M4(2) of the building regulations and 4% of affordable dwellings in Preston and Chorley and 5% of affordable dwellings in South Ribble to be built to M4(3) of the building regulations is not evidenced appropriately with regard to viability.

- 2.13 Optional standards for dwellings were introduced by the Government in 2015. The Practice Guidance makes reference to a number of factors that can be taken into account when evidencing a need to set higher adoptable standards<sup>1</sup>. Of the factors referred to in the Practice Guidance, Rowland does not consider that the overall impact on viability has been fully addressed in the evidence base for the CLLP.
- 2.14 Rowland and other housebuilders often provide a number of 2-3 storey apartments on development sites to accommodate smaller units. In these instances, it is not economically viable to provide lifts in 2-3 storey apartment blocks and as such, a degree of flexibility is required in the policy rather than a prescriptive requirement on all dwellings.
- 2.15 Part 5 of the Viability Report makes a construction cost assumption on M4(2) properties. A baseline assumption of £1,109 per unit is made for flats, and £626 per unit for houses. This demonstrates that there are higher costs associated with providing flats at an M4(2) standard than houses. It is assumed that this higher cost is factored on the need to provide a lift to allow for upper floors of flats to have level access. However, the cost of providing a lift would be significantly higher than that assumed by the Council. If houses are more viable to deliver on site than flats, this could compromise the Council's density aspirations and make it more difficult to abide to the proposed housing type mixes proposed at tables D6 - D8 of the three Councils HNDAs.
- 2.16 It is therefore considered that the requirements to comply with M4(2) and M4(3) standards are not appropriately justified by viability evidence.

*7.2 c) Are the minimum density requirements justified and appropriate? What account has been taken in the density requirements for the delivery of on site BNG?*

- 2.17 In the context of Rowland's interest at allocation EC5.3, the submission of a planning application for residential development at the site shows that a net density of 34 dph is achievable (ref. 25/00907/FULMAJ). For Chorley, 'other locations within settlement boundaries' are required to achieve a minimum density of 27 dph. The submission of an application at the site (within the settlement boundary of Chorley) has shown that this is achievable in the context of allocation EC5.3. Open space and biodiversity enhancements have also shown to be able to be accommodated at the site, as demonstrated in the planning application submission drawings. In the context of EC5.3, the density requirements for Chorley are considered justified and appropriate.

*d) Are there any omissions in the policy?*

- 2.18 The Local Plan evidence (Housing Needs Demand Assessments) states that M4(2) dwellings should be provided 'where possible', this has not been factored into the wording of Policy HS6, nor has it been fully justified as to why a blanket approach is considered necessary other than reference to changing demographics in the Borough. The viability impact of providing 100% M4(2) dwellings should be thoroughly considered with regard to housing mix and density particularly in reference to 2-3 storey apartment blocks. The wording of Policy HS6 will fail to ensure that the Council can meet its recommended

<sup>1</sup> Planning Practice Guidance - Paragraph: 007 Reference ID: 56-007-20150327

density requirements and housing mixes as the cost of delivering flats to an M4(2) standard is considerably more than dwellings.

*7.3 a) Does Policy HS7 provide an effective framework for maximising the delivery of affordable housing over the plan period? Based on the thresholds and requirements in Policy HS7, will affordable housing needs be met?*

- 2.19 Rowland consider that the Policy requirement that requests a minimum of 30% of dwellings in tier 1, 2 and 3 settlements (for developments of 10 dwellings or more, or on a site 0.5 hectares or more) to be effective for maximising affordable housing in these settlements.

*7.3 c) Is there convincing evidence to justify the proposed tenure split for affordable housing units? Does it accurately reflect the requirements for affordable housing in the Housing Needs and Demand Assessments? Is it sufficiently flexible?*

- 2.20 For Chorley, a tenure split of 71% social rent and 29% affordable home ownership (including first homes) is proposed as part of the Policy. This split differs from Preston (76% social rent / affordable rent and 24% affordable home ownership) and South Ribble (77% social rent / affordable rent and 23% affordable home ownership).
- 2.21 Paragraph 5 of the Chorley HNDA 2024 states that the recommended affordable tenure mix based on latest evidence is 47% social rent, 24% affordable rent and 29% affordable home ownership. Therefore, it is unclear what has evidenced the Council's proposed tenure split for Chorley that excludes affordable rent from the mix when Preston and South Ribble have followed the recommendations for affordable tenure mix in their respective HNDAs. In addition, it is not clear in the evidence base whether the affordable tenure mix for Chorley has been considered in terms of viability.
- 2.22 On this basis, it is not considered that there is convincing evidence to justify the proposed tenure split for affordable housing in Chorley.

*7.3 d) Is the policy sufficiently clear regarding the approach to be taken for off-site and/or financial contributions in lieu of on-site provision? Is the 20% supplement for commuted sums justified?*

- 2.23 A 20% supplement for commuted sums is not considered to be justified and is not consistent with national policy. The PPG is clear that monitoring fees can be charged but they 'must be proportionate and reasonable and reflect the actual cost of monitoring' (23b-036-0190901).
- 2.24 A catch all set percentage of 20% is not proportionate or reasonable and in some instances, particularly larger sites, will not reflect the actual cost of monitoring. This percentage is not advocated in national policy or guidance, is not consistent with the CIL tests set out in NPPF para. 58[2] and the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019. As such, this percentage needs to be revised considerably and capped in accordance with the PPG. This element of the policy is not required as Policy ID2 (5) also requires a monitoring charge to be paid to cover the cost of monitoring all S.106



obligations.