

# **Central Lancashire Local Plan - Matters Papers Hearing Statement**

## **Matter 7 Housing Policies**

**Harworth Estates Investments Ltd**

Representor ID: A61

06 November 2025

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## 1.0 Introduction

- 1.1 Lichfields is appointed by Harworth Estates Investments Ltd [Harworth] (Representor ID: A61) to prepare Matters Papers relating to the emerging Central Lancashire Local Plan [CLLP].
- 1.2 This Written Statement has been prepared in response to the Matters, Issues and Questions [MIQ] raised by the Inspectors for the Examination in Public [EiP] hearing sessions. The Written Statement addresses the following Matter:
- Matter 7 - Housing Policies
- 1.3 Other Matters Papers have also been prepared by Lichfields on behalf of Harworth to address the following:
- Matter 1b – Overarching Matters
  - Matter 2 - Vision & Objectives, Spatial Strategy & Location of New Development, and Site Selection Process
  - Matter 4 - Strategic Sites & Mixed Use Allocations (Policy SS5 - Preston West)
  - Matter 8 Issue 8 - Employment Land Need
  - Matter 14 - Sustainable Travel, Infrastructure and Delivery, and Monitoring
- 1.4 These Matters Papers have been drafted in the context of Harworth’s land interest in the draft Preston West strategic allocation (draft Local Plan Policy SS5) (‘the Site’). Harworth has an interest in a large proportion of land across the site, including the Tallentine land, and is committed to progressing a high-quality, sustainable, attractive and accessible development, complementing the existing residential and employment development in Preston.
- 1.5 Harworth is supportive of the draft Preston West allocation (Policy SS5) and considers that the site represents an excellent opportunity to deliver a sustainable, high-quality and attractive residential-led development. Harworth has been working closely in collaboration with the Council to ensure that a robust allocation based on sound and proportionate evidence can be facilitated, to set the basis for the comprehensive delivery of the site.
- 1.6 These Matter Papers representations should be read in conjunction with previous submissions on the CLLP (Representor ID A61) 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’).

## 2.0 **Matter 7 - Housing Policies**

### **Q 7.1 a) Are the requirements in Policy HS5 for the provision of open space and playing pitches 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 Harworth has no significant concerns with the approach set out in the policy pertaining to Preston West and the supporting methodology for the provision of open space and playing pitches, provided the requirements of the policy do not adversely impact the viability position of strategic allocations, including Preston West. However, Harworth considers that there is limited evidence to support the requirements in Policy HS5 from a viability perspective.

2.2 The 2023 NPPF and PPG are clear that viability assessments should be undertaken at the plan making stage, yet there is currently limited information set out in the viability calculation in relation to open space or playing pitch requirements. Harworth raised this point in response to the Reg. 19 consultation, noting that the Central Lancashire Local Plan Main Viability Report should be updated to ensure all relevant considerations are factored into the appraisal with accurate and proportionate costs for open space requirements. However, there does not appear to be updated viability information published.

2.3 Given this concern regarding the lack of viability evidence, Harworth considers that Policy HS5 must include adequate flexibility in the wording of the policy to ensure that the cost of providing off-site financial contributions for open space requirements and playing pitches does not adversely impact the viability position of the Site. This could impact the delivery of the Site if it is not sufficiently addressed, and it is imperative that flexibility is incorporated into the policy.

### **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?**

2.4 No, as Policy HS6 does not provide sufficient flexibility to ensure site specific considerations can be taken into account.

2.5 Table D8 of the Preston Housing Need and Demand Assessment summarises the overall dwelling type/ size and tenure mix recommendations for each sub-area of Preston. The site is located in the sub-area 'West', which sets out a range for each dwelling type / size.

2.6 Harworth has concerns regarding the market mix ranges presented and considers that additional flexibility should be provided within the Policy by presenting the mix as wider ranges which allows for site-specific considerations to be taken into account, as well as changes to market factors which may influence need and demand in future. This is particularly important at this strategic site given the long-term nature of its delivery and the policy needs to be flexibility enough to account for market change of the period of time it will take this site to come forward.

2.7 Rather than apply an overly prescriptive approach to each sub-area of Preston, site-specific considerations should also be a material consideration for a site's proposed housing mix whilst also being in broad alignment with the recommendations in the Housing Needs Demand Assessments. For example, when formulating an appropriate housing mix, it is important to factor in any local market considerations including viability. This will ensure that future development responds to the specific needs of a local area at that point in time and does not compromise appropriate site-specific housing mixes from being delivered.

**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?**

2.8 Part b of Policy HS6 requires that all sites of 10+ dwellings are built to a M4(2) accessible and adaptable standard, which would include bungalow / level access accommodation. Harworth is supportive of providing housing for people with additional needs but considers that a blanket requirement for all properties to be built to an M4(2) standard is not justified or appropriate. Harworth does not consider that the potential viability impact has been fully considered in the formulation of Policy HS6.

2.9 There appears to be no consideration set out in the Central Lancashire Local Plan Main Viability Report (February 2025) of whether providing all M4(2) compliant dwellings would have adverse viability implications. Requiring all dwellings to be M4(2) compliant across sites, including Preston West, will have significant cost implications.

2.10 For example, Harworth and other developers may provide a number of 2-3 storey apartments on development sites to accommodate smaller units and ensure that the required policy mix can be met. In these instances, it is not practical or viable to provide lifts to upper floors in 2-3 storey apartment blocks and as such, a degree of flexibility is required in this policy rather than a prescriptive requirement on all dwellings.

2.11 Flexibility should be provided in the Policy to allow for instances where providing 100% M4(2) dwellings may not be possible due to site specific circumstances, certain dwelling types such as apartments and viability considerations. Harworth would support a policy requirement which is more generic and less prescriptive in terms of suiting the needs of older residents.

**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?**

2.12 To promote the effective use of land the following minimum gross densities are required on all housing developments:

- Preston City Centre - 86dph;
- Town, District and Local Shopping Centres – 40dph;
- Other locations within settlement boundaries – 27dph;
- Outside settlement boundaries - 21dph.

- 2.13 Based on the draft CLLP Policies Map, Harworth understands that the Site is situated within the Preston settlement boundary and a minimum gross density requirement of 27dph therefore applies. Harworth objects to the minimum densities set out in the policy as it is concerned that these gross densities will be too high, particularly for a site such as Preston West. If applying a gross to net conversion (based on the actual net developable area of the site) these densities are considered excessively high, particularly for 'other locations within settlement boundaries' such as Preston West and would have implications for the design and viability of schemes at the planning application stage. The gross densities currently stated might be appropriate for specific areas within the Preston West site around the potential new local centre, or in proximity to the proposed Cottam Parkway Train Station, but would not be appropriate in other areas of the site towards the periphery where far lower densities would be more suitable.
- 2.14 The policy requirements for minimum densities must consider the gross to net conversion based on the developable area of the site and should therefore be reduced accordingly, with the requirements based on net developable area to account for site constraints, policy requirements and any supporting infrastructure such as roads or community uses. Flexibility must also be incorporated into the policy to allow for higher densities where it is considered appropriate based on-site context and site-specific considerations, such as locations around the Cottam Parkway Train Station.
- 2.15 Policy HS6 should be amended to reference net developable areas when setting out minimum residential densities and flexibility must also be incorporated into the policy to allow for higher densities where it is considered appropriate based on-site context and site-specific considerations.

**Q7.3 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?**

- 2.16 For Preston, a tenure split of 76% (52% Social Rent/24% Affordable Rent with a priority for Social Rent) and 24% Affordable Home Ownership including First Homes, is proposed in Policy HS7. The proposed tenure split is based on the assessment undertaken in the Preston HDNA 2024 which Harworth considers is a comprehensive assessment of affordable housing need in the Borough.
- 2.17 Harworth has no issues with the proposed tenure split for Preston, provided this has no adverse viability implications and it is ensured that adequate flexibility is incorporated into the policy. Currently, the policy does allow for some flexibility to propose an alternative tenure split at application stage. Part 5 states that the tenure split must be provided unless it can be robustly demonstrated that an alternative split meets an independently assessed proven need, or it is demonstrated to the Council that the development would not otherwise be financially viable. Furthermore, part 7 states that the size and type of affordable housing provided must accord with Policy HS6 unless robust evidence of a specific need is demonstrable. This allows for an up-to-date assessment of affordable housing need to be undertaken at the planning application stage which can respond to market factors and the needs of the local area at that specific time. Harworth considers that this flexibility is

important and must be retained as part of the policy to ensure the right type and tenure of affordable housing is provided.

**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?**

- 2.18 Harworth acknowledges that authorities can charge a monitoring fee through section 106 planning obligations, to cover the cost of monitoring and reporting on delivery of that section 106 obligation. Monitoring fees can be used to monitor and report on any type of planning obligation, for the lifetime of that obligation. However, Harworth disagrees with the 20% requirement as this level of fee is not justified within the CLLP or its accompanying evidence base and is not supported by or consistent with national policy. The PPG<sup>1</sup> states that fees could be a fixed percentage of the total value of an individual obligation. However, in all cases, monitoring fees must be proportionate and reasonable and reflect the actual cost of monitoring. Harworth considers that the 20% fee is not proportionate and reasonable and could be considered to be excessive.
- 2.19 This percentage is not advocated in national policy or guidance, is not consistent with the CIL tests set out in NPPF para. 57<sup>2</sup> and the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019. The percentage should therefore be significantly reduced unless it can be adequately demonstrated by the Central Lancashire authorities that this percentage is appropriate and justified.

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<sup>1</sup> Paragraph: 036 Reference ID: 23b-036-20190901

<sup>2</sup> Set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010





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