

14<sup>th</sup> April 2025

Central Lancashire Local Plan Team  
Regulation 19 Consultation  
3rd Floor Town Hall  
Lancaster Road  
Preston PR1 2RL



Our ref: APPL119

**By email: [centrallancashireplan@chorley.gov.uk](mailto:centrallancashireplan@chorley.gov.uk)**

Dear Sir/ Madam,

**REPRESENTATIONS BY FAIRHAVEN HOUSING ASSOCIATION  
CENTRAL LANCASHIRE LOCAL PLAN 2023 - 2041 REGULATION 19 CONSULTATION**

This representation is submitted on behalf of our client Fairhaven Housing Association ["Fairhaven"] in response to the Publication Version of the Central Lancashire Local Plan 2023 - 2041 ["the draft Plan"] which was issued for consultation from February to April 2025.

This representation is submitted in support of the following draft policies, subject to amendment:

Policy HS12 Specialist Housing  
Policies HS4.13 and HS4.14

**Background**

**Fairhaven Housing Association**

Fairhaven is a not-for-profit charitable organisation which was formed in 1980 with the sole purpose of developing and managing privately-owned community accommodation for retired and older people aged over 55. Its retirement communities are fully aligned with Government policy to widen housing choice for retired and older people so that they can continue living safely, securely, comfortably and independently in their own homes for as long as possible.

Fairhaven enables older people to enjoy the security of home ownership within a fully supported community environment suited to their changing needs. It enables independence, fosters community, preserves dignity and promotes physical and mental wellbeing. Fairhaven is genuinely passionate about the benefits of age-appropriate community housing which supports older people to maintain independence, reduces the burden on social care and creates additional supply within local housing markets. Its bungalows meet Part M4(2) 'accessible and adaptable' housing standards and qualify as specialist housing for older people.

Fairhaven is committed to delivering its 'bungalow community' model of service led retirement housing. This creates much needed choice within the older people's housing sector and is a hugely attractive option for its residents and customer base. Its two-bedroom single-level bungalows are sold on a freehold transfer model which ensures the security of home ownership without the complications

of leasehold accommodation. They also incorporate energy-efficient construction and low carbon and renewable energy heating systems to minimise running costs and reduce emissions.

A fundamental part of the Fairhaven offer which is greatly valued by residents, is its 'placemaking' and emphasis on communal gardens and shared spaces within which the private bungalows are set, to create an attractive and peaceful living environment which benefits residents' sense of belonging and fosters and supports friendships between residents.

Fairhaven also offers residents a number of supported-living and service packages including an on-site restaurant providing daily meals; a community lounge and meeting rooms; laundry, cleaning, shopping and domestic services; community events, activities and day trips; and a range of warden assistance and care packages. Guest accommodation is also available for residents' friends and families when they visit.

Fairhaven aims to develop its retirement and older people's communities in sustainable locations within and on the edge of popular towns and villages. The difficulty it faces in finding land is that all types of site, whether brownfield or greenfield, which are either allocated for housing development or suitable windfall opportunities, are acquired by developers of general-needs two storey housing and consequently, Fairhaven is 'priced out' of the market and unable to compete.

A brochure for the Fairhaven retirement community at Crownlee in Penwortham, Preston is included for information. Crownlee has been developed in two phases and provides 48 no. two-bedroom bungalows set in communal gardens with a residents' community centre. Turnover and availability of the bungalows is very low and demand is consistently high.

Its age-exclusive bungalows meet the Part M4(2) Accessible and Adaptable Homes building regulation standard and the Nationally Described Space Standard and qualify as specialist housing for older people as defined in the PPG (63-010-20190626).

The ethos of Fairhaven offer is therefore fully aligned with the most recent expression of Government policy in the November 2024 Written Ministerial Statement (HCWS249) to widen housing choice for retired and older people (defined in the NPPF Glossary) so that they are able to continue living safely, securely, comfortably and independently in their own homes for as long as possible.

### **Older People's Housing Taskforce**

Fairhaven is a longstanding advocate of reform to national planning policy and local development plans to improve understanding, boost the supply and delivery, and widen the choice and range of specialist housing to meet the needs of retired and older people.

The Government appointed the Older People's Housing Taskforce in May 2023 to 'look at options for the provision of greater choice, quality and security of housing for older people' and the key messages of its report 'Our Future Homes: Housing that Promotes Wellbeing and Community for an Ageing Population' (published in November 2024) are:

- The Government recognises the importance of increasing the supply and improving the housing options for older people in later life, and will give careful consideration to the many recommendations set out in the Taskforce report.
- Providing a range of safe, suitable housing for older people in later life helps them live independently, safely and well, for longer. It can enhance the wellbeing of our senior citizens and reduce demand on adult social care services and the National Health Service.
- The Government is committed to helping older people to live comfortably and independently at home for as long as possible.

Alongside the Taskforce report, the Government published two related reports:

- 1) 'What Older People Want' - a rapid evidence assessment on what older people want and can afford, when it comes to their housing choices when looking to move
- 2) 'Patterns and Trends in Planning Applications for Older Persons Housing' - an exploration of factors impacting the delivery of planning permissions for older person's housing

Key extracts from all three reports are reproduced below and with the most important text underlined.

**Taskforce Report 1) Our Future Homes: Housing that promotes wellbeing and community for an ageing population**

*Executive summary:*

"Home" holds significant meaning for individuals of all ages, serving as a safe space where people can truly express themselves, pursue interests, connect with others and build memories. That does not change as we age.

When asked about the priorities they attach to their housing arrangements, the aspect that senior citizens mention most often is "independence". We have a wealth of evidence of the features of one's home that enable healthy, independent living. And indeed, it is not difficult to picture that for ourselves or for friends and family - a home where the physical fabric, the facilities and the fittings support our needs. Where we can connect with the wider community, local services and those from whom we may draw support. There is no single 'best' model for providing this in older age.

But as our population ages, we need to expand these housing options - not just in variety, but in volume as well. We need to offer senior citizens greater choice, particularly as their lifestyle and health needs evolve in later life. Ensuring suitable, accessible and affordable housing for later living is a societal obligation on which the current housing market falls significantly short.

*Taskforce recommendations:*

- No.2 Incentivise a wide range of older people's housing (OPH) / later living homes (LLH) options - senior citizens in the UK are not a homogeneous group. They are highly diverse in their

needs, wishes, backgrounds and identities. Meaningful choice must be available and accessible to all.

- No.3 Ensure more housing is designed for later life - we have a growing ageing population and housing stock that does not meet their needs. We need to optimise all forms of OPH / LLH including mainstream housing, community-led housing, service-led housing and care homes. Homes need to be desirable, accessible, adaptable, technology-enabled, energy efficient and affordable to meet the housing needs and lifestyle of an ageing population.
- No.5 Expand OPH / LLH at scale that is affordable to live in and viable to build and operate - our collective ambition should be to urgently scale up the quality and quantity of the OPH / LLH market, at more affordable pricing, in order to open up new more age-appropriate choices in later life to people of lower to middle-affluence.
- No.6 Strengthen planning policies - our collective ambition should be to ensure that the planning system helps to deliver a greater volume and diversity of OPH / LLH by ensuring that there is a proper assessment and response to levels of need, that there is sufficient site allocation for all forms of OPH / LLH, and that local planning authorities make better and more timely choices in planning applications for OPH / LLH. National and local planning policy and practice can incentivise and accelerate the development of new forms of OPH / LLH and help shape mainstream housing and the built environment to be more age-friendly.

*The challenge for the Taskforce:*

Providing the variety, volume and choice that is needed to meet the needs of senior citizens today and in future years requires radical and ambitious action. A status quo is not sustainable.

52% of older people live alone, with lower wellbeing than those who live with others and higher rates of loneliness, and poorer physical and mental health. Increased travel time to senior citizens living dispersed and isolated lives means more social care staff are needed to provide care, at a time when the social care workforce is stretched. Housing solutions must promote social connection.

A troubling lack of supply of purpose-built OPH / LLH: At present an average of around 5-7,000 later living homes are built annually, out of a total c.200,000 newly built homes. This is in sharp contrast to the 30-50,000 new homes a year estimated to be needed to meet the ageing population.

We need to 'promote wellbeing'. Helping older people to live fulfilling lives in safe environments will help them live well for longer and keep them out of hospital. Avoidable ill health is leading to overuse of already over stretched health and social care services. This is likely to get worse as the ageing population challenges adult social care and the workforce.

*What stops senior citizens [from] moving [home]?*

The Taskforce identified a range of barriers behind this including:

- strong psychological barriers associated with ageing
- difficulty disentangling housing needs from future health
- lack of awareness about the range of housing options

- concerns about cost and affordability
- availability of suitable housing.

There is a shortage of appropriate options for downsizing that are affordable and meet the housing aspirations of older people (relating to tenure, size, design, accessibility and location)

*Ageing in place in mainstream housing:*

Asked what they look for in a home, older people came up with similar words - community, belonging, safety, security - and in practical terms, living on one level in a home which is cheaper to run, easier to maintain and close to local amenities. A home which enables independence is key.

*A wide range of age-friendly options:*

To meet the diverse needs and preferences of our ageing population, local and national policy makers should strive to provide a range of choices. In addition to expanding the supply of purpose-built, service-led housing (supported living and assisted living) at affordable price points, we also need age-friendly and inclusive mainstream and community-led housing. Without action, housing developers will continue to build stock that is unsuitable for our ageing population, especially for people of lower to middle-affluence.

*Strengthening planning policies:*

Local authorities face a profound structural shift in the demographic balance of their populations and the way we plan for and deliver housing for an ageing population needs urgent reform.

Local authorities need to be given the right levers to reverse the chronic under supply of older people's housing to meet growing future demand. This means ensuring sufficient land is made available [by local plans] to support the volumes of new supply needed. Raising the profile and priority given to OPH / LLH in local plans will bring confidence to providers and help overcome the "social reluctance to plan for old age."

The reforms the Taskforce proposes are not just about fixing problems. They are about ensuring that local authorities become aspirational, age-friendly and inclusive place-makers and that planning for an ageing population should no longer be an afterthought, it should be integral to the way we plan our places and communities.

84% of Taskforce respondents considered that there should be a standard approach to assessing older people's housing need, and this should include a segmented understanding of diverse needs to prevent over reliance on one OPH / LLH type and should consider affordability.

There is typically a lack of awareness among local planning authorities of the benefits of older people's housing and the underestimation of OPH / LLH needs results in a lack of site allocations in local plans. Whilst PPG (63-013) states 'it is up to the plan-making body to decide whether to allocate sites for specialist housing for older people', research found that only 36.2% of plans have a specific policy for OPH/LLH and even fewer make specific site allocations. This leads to higher risk and uncertainty for developers. 66% of surveyed housebuilders who have left the OPH / LLH market

thought that allocating suitable sites in local plans would encourage more supply and 33% of those not currently in the OPH / LLH market said it might encourage them to enter.

## **Taskforce Report 2) What Older People Want**

This research was commissioned to look at the options for the provision of a greater choice of housing for older people.

### *Preferences and priorities:*

- Most older people want to live independently in their own home for as long as possible.
- Whether older people 'stay put' or move, they place great emphasis upon being 'at home' and priorities centre on emotional attachments and the use-value of housing.
- Older people prioritise aspects of housing that support aspirations to age in place including to live independently, maintain wellbeing, exercise choice, be an active member of society, contribute to family life, not feel like a 'burden', and have good relationships with neighbours.
- Priorities for the physical dwelling and its location are considered in relation to how they meet these higher-order aspirations (for example, independence, wellbeing, social relations). Older people tend to be risk averse when evaluating whether different housing options will meet these fundamental aspirations. With the current home seen as more likely to meet aspirations than moving, which is often seen as an 'unknown'.
- When considering the location of their housing preferences, older people frequently cite the social benefits that arise from a sense of community and belonging, access to social networks and being close to family and friends.
- Older people value of living in housing that can accommodate changes in physical and cognitive functioning as they age. For example, single-floor dwellings, such as bungalows, and properties with stair free access are recognised as making a property more accessible and safer for older people. This is a common priority when moving in older age.

### *What opportunities exist for older people to move into mainstream housing that is more suitable by virtue of size, location and design?*

Many older people who want to either move or downsize are put off by the lack of suitable alternatives, especially in the areas where they currently live. It is also important to recognise that suitable housing does not necessarily mean smaller housing. There can be good reasons why older people prioritise space and spare bedrooms. This includes having family and friends to stay, having visiting support and storing health and medical equipment.

### *Mainstream housing:*

Despite awareness of the potential benefits of moving, some older people view the policy focus on down-sizing as frustrating because it deprioritises their wellbeing. The notion of 'ageing in the right place' has emerged as something of a counter to this agenda. This places older people's wellbeing at the centre of housing decisions, whether that be to stay put or move.

### *Barriers to moving:*

The housing options available to many older people do not represent a substantial improvement upon their current living situation when considering cost, accessibility, and location, and there is limited

supply of some of the most highly sought after forms of housing in old age (such as bungalows) across all tenures.

*Moving destination:*

Moving destination can be analysed in terms of distance (whether a move is local or to a new neighbourhood or region) and in terms of housing type (whether into mainstream or specialist accommodation). Most moves made by older people are local.

**Taskforce Report 3) The failure of the planning system to deliver specialist housing for retired and older people**

Importantly, the Taskforce also considered how the limitations and failures of the current planning system contribute to the undersupply of housing for retired and older people, and the difficulties which are frequently experienced by providers of OPH who try and persevere to deliver specialist housing.

- 1) The Taskforce's call for evidence and other engagement has shown widespread concern that local planning authorities are not sufficiently aware of the benefits of different types of older people's housing or the challenges to successful delivery.
- 2) Developing new OPH / LLH is hampered further due to the complexities in the planning system in England. Analysis for the Taskforce has found that planning consents granted in England for OPH / LLH are low and have fallen from approximately 180 in 2015 to just 80 in 2023.
- 3) The Taskforce research revealed trends and issues that arise in the planning system as it processes applications for OPH / LLH. There are several reasons for the lower success rate of applications for OPH compared with planning applications for general needs housing:
  - most local plans do not make specific allocations for OPH, meaning that OPH schemes either have to compete with general housing for sites, or try and gain permission on sites [which are] either not identified or not allocated for residential development;
  - competition for open market housing sites is difficult as some OPH schemes are lower density (e.g. bungalows) and have reduced returns for the landowner.
  - the difficulty in securing appropriate sites means that OPH schemes are often being pursued on unallocated sites or on sites outside of existing development boundaries which increases the likelihood of policy conflict and refusal.
- 4) Currently, very few sites are allocated for OPH/LLH, and appropriate sites can be hard for providers to identify.
- 5) The viability of private OPH/LLH is seriously challenged by the need for developments to make contributions to Section 106 requirements, affordable housing and CIL. Planning policy needs to recognise that the development economics for OPH / LLH can differ significantly from general housing due to the additional costs of non-revenue generating shared facilities and higher build costs of a fully adaptable and accessible built form.
- 6) The Taskforce heard that house builders have left the older persons housing market and that many private investors are hesitating to invest due to the higher perceived risks.

## Representations in response to the draft Plan

The City of Preston Housing Need and Demand Assessment was published in 2022 (“Assessment”). The Preston population is predicted to increase to 147,970 by 2038. Table 2.13 of the Assessment is entitled ‘Change in population 2021-2038 by age’. Over the period 2021-2038 the 2018-based ONS projections predict the greatest populations increases in the older persons age brackets as follows:

- 65-74 years – 22.7%
- 75-84 years – 35.6%
- 85+ years – 32.6%

The predicted population increases in the older age ranges is significantly higher than those under the age of 54 years. By way of comparison:

- 0-19 - -1.1%
- 20-39 – 1.8%
- 40-54 – 2.8%

Local population projections follow the national trend of an increasing ageing population.

The largest increases in households will be one person and other households with two or more adults, and households with a Household Reference Person aged 65 and over.

The Assessment contains a section on the ‘Needs of Different Groups’. Table 4.1 provides survey data on ‘Older persons’ housing preferences by age group’. Most of the people surveyed would prefer to remain in their own home in old age. As stated previously this can often be because there is little alternative. The next most popular choice was to buy a house on the open market.

Homeownership is a familiar concept for the majority of older people so it is no surprise that most older people in the locality would like to continue to own their own home. Most respondents aspire, and also expect, to either downsize or stay in a home of the same size.

Given the ageing of the population, the need for specialist older person accommodation is expected to increase. Based on population projections there is a need for 1,903 additional units of specialist older persons’ accommodation by 2038 (Table 4.4 of the Assessment).

The Assessment concludes that given the ageing population there needs to be a broader housing offer for older people in the area and that ‘the challenge of ensuring that the housing and support needs of older people is met going forward’.

The findings and conclusions of the City of Preston Housing Need and Demand Assessment provide a firm foundation for the development of planning policies for older persons housing.

Turning now to the policies of the Draft Central Lancashire Local Plan.

## **Required modifications to make the draft Plan sound**

### **Policy HS12: Specialist Housing**

Policy HS12 is a development management policy which will be used to regulate qualifying specialist housing windfall proposals which come forward. The policy is supported in principle as it recognises the requirement in the Borough to meet a specialist housing need which includes housing for older people. However, such proposals are dependent on windfall sites. Relying on the delivery of this much needed housing in the form of windfall sites creates uncertainty and delays in the delivery of older person's housing. A more proactive approach would be welcomed whereby a portfolio of site allocations are identified and protected exclusively for older people's housing.

### **Policy HS4.13 Heather Moor, Cumeragh Lane and HS4.14 Gorlands, Whittingham Road**

The above sites are located on the western edge of Longridge and allocated for specialist housing for older people. The sites are estimated to be able to provide c.41 dwellings and c.32 dwellings respectively.

The allocation of approximately 73 homes for specialist housing for older people is very much welcomed by Fairhaven and is supported. Wilson Mason Architects has prepared a proposed site plan for both allocations and has demonstrated the site's suitability for housing for older people. The draft plan comprises 68 bungalows, a community hub, open space, and car parking for visitors.

The site is ideally located on the edge of Longridge with good access to local services and facilities, including nearby bus stops. There are no known constraints that would prevent the sites coming forward for older persons' housing.

As service led housing provider Fairhaven finds it impossible to compete with volume housebuilders in the acquisition of land. This is largely due to the provision of single storey homes and a community centre which are central to the Fairhaven offer. A specific allocation is therefore welcomed.

Whilst the policies are generally sound, it would be helpful if the policies narrowed down the eligibility criteria to service led housing for older people to take into account of the difficulty that developers' such as Fairhaven face in competing for land.

It is requested that Policies HS4.13 and HS4.14 do not include a requirement to provide affordable housing. The Fairhaven schemes comprise a community hub and attractive areas of open space for its residents. The provision of affordable housing does not form part of the Fairhaven model for viability reasons given it is a not-for-profit organisation. The plan should be modified to remove the need to comply with Policy HS7: Affordable Housing, which is applied to general open market housing.

Yours sincerely

**Deborah Smith MRTPI**

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Encs:

1. Longridge Site Appraisal (Wilson Mason Architects)
2. Fairhaven – Crownlee Brochure