

Response ID ANON-XXXX-WAFA-Q

Submitted to Central Lancashire Local Plan Regulation 19 Representation Period
Submitted on 2025-04-14 10:16:27

Part A: Personal Details

1 What is your title?

Ms

2 What is your first name?

First Name:

Jane

3 What is your last name?

Last name:

Vlach

4 What is your job title? (if relevant to the representation)

Job title:

5 What is your organisation? (if relevant to the representation)

Organisation:

[REDACTED]

6 What Authority do live/work in?

Not Answered

7 What is your address?

Address line 1:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 What is your email address?

Email:

[REDACTED]

Part B: Representation

9 Which part of the Central Lancashire Local Plan would you like to make a representation about?

Chapter 4: Balanced Housing Market (HS1-HS13)

Chapter 4: Balanced Housing Market

47 Which policy would you like to make a representation for?

HS12: Specialist Housing

HS7: Affordable Housing

60 Do you consider the Central Lancashire Local Plan is:

Spatial Vision: Soundness/legal/DtC - Legally Compliant:

No

Spatial Vision: Soundness/legal/DtC - Sound (If you check 'No', please also confirm below which of the 'tests' it fails to meet):

No

Spatial Vision: Soundness/legal/DtC - a) Positively prepared:

No

Spatial Vision: Soundness/legal/DtC - b) Justified:

No

Spatial Vision: Soundness/legal/DtC - c) Effective:

No

Spatial Vision: Soundness/legal/DtC - d) Consistent with national policy:

No

Spatial Vision: Soundness/legal/DtC - Complies with the Duty to Cooperate:

Yes

61 Please give details of why you consider the Central Lancashire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (i.e., if objecting on legal grounds then please quote the specific law that the Central Lancashire Local Plan does not conform with). If you wish to support the legal compliance or soundness of the Central Lancashire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy HS7: Legal Compliance:

Policy HS7: Affordable Housing

Policy HS7 requires 'all residential developments of 10 or more dwellings or, on a site of 0.5 hectares or more in size, to deliver affordable housing as follows: (a) A minimum of 30% of the total number to be provided on sites in Tiers 1, 2 and 3 of the settlement hierarchy or (b) A minimum of 35% of the total number to be provided on sites in all other locations'.

The generic policy includes Older Persons Housing, despite the Housing Need and Demand Assessments (2024) not having assessed the level of need for affordable older persons housing.

From a delivery perspective, requiring affordable housing on a typical older person housing development which ranges from 40-60 dwellings is unlikely to be achievable. 30% affordable housing would yield between 12-18 affordable units, where viable. No registered provider will take such a small number of affordable units as part of a mixed management scheme, particularly where the proposal is a specialist age restricted proposal. Affordable tenures are far more likely to be delivered by specialist registered providers where they can control service charges and ensure long term affordability for residents and achieve sufficient economies of scale (typically at least 25+ units in our experience).

To support the Local Plan the Council has undertaken a viability study entitled 'Main Viability Report Central Lancashire' February 2025 (Aspinall Verdi).

The Report is very clear in its viability findings in respect of Older Persons' Housing, as shown below:

Paragraphs ES 49 & ES 50 of the Non-Technical Summary state:

ES 49 The results of our viability appraisals in section 7 demonstrates that Older Person's housing is fundamentally unviable, even without the provision of affordable housing.

ES 50 We emphasise the need to seek delivery partners when bringing forward Older Person's schemes

Paragraph 6.125 of the main report says:

The lack of viability... [for OPH] can be attributed to the higher delivery costs associated with this type of housing. These developments typically involve additional design requirements to meet the needs of older residents, including increased communal spaces and enhanced accessibility features.

Paragraph 6.127 says:

These findings suggest that, under current conditions, both older person's housing and extra care schemes would require significant financial support - either through grant funding, reduced land costs, or policy interventions to become viable

The Report includes comments from Aspinall Verdi in response to feedback from a Central Lancashire Local Plan Viability Stakeholder Workshop held in January 2025. Their comments include:

"...the tested OPH typologies are not viable and no affordable housing is recommended on Older Persons Housing"

The conclusions of the Viability Reports are in line with our experience elsewhere on site specific assessments where it is commonly agreed that this typology cannot provide full percentages of affordable housing. More and more local planning authorities are acknowledging this position within local plans and exempting specialist housing for older people from providing affordable housing. This is the correct approach.

We would draw the Council's attention to the newly adopted Fareham Local Plan Paragraph 5.33 of Policy HP5: 'Provision of Affordable Housing' which states:

The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HP5 does not apply to specialist housing or older persons housing.

Emerging policies in both Birmingham and Charnwood also propose affordable housing exemptions in respect of proposals for housing for older people having found through their plan wide viability assessments that viability was constrained for these typologies.

Birmingham

Due to the specific viability challenges of delivering older persons' housing, the evidence suggests on the basis of the market research, appraisal inputs and policy requirements, Older Person's Housing is exempted from Affordable Housing provision.

Charnwood

Our viability evidence shows that neither sheltered housing nor extra care housing developments are likely to be viable if a contribution towards affordable housing is sought.

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HS7: Modifications:

Recommendation

As older people's housing has been included within the viability assessment to inform the Local Plan and been found to not be viable the policy and supporting paragraphs should therefore be amended to make it clear that older person's housing is exempt from all types of affordable housing. This is necessary for the plan to be sound, deliverable, justified and consistent with national policy.

Add new point to end of policy HS7 to read:

Schemes delivering housing for older people are exempt from delivering affordable housing.

63 Do you wish to make a representations about a different section of the Plan?

Yes

HS12: Specialist Housing

80 Do you consider the Central Lancashire Local Plan is:

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No

Spatial Vision: Soundness/legal/DtC - d) Consistent with national policy:

No

Spatial Vision: Soundness/legal/DtC - Complies with the Duty to Cooperate:

Yes

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Policy HS12: Legal Compliance:

McCarthy Stone previously submitted comments on the emerging plan at the Regulation 18 stage and some comments are repeated as appropriate.

Older Persons' Housing Need - National

Government policy, as set out in the revised NPPF, is to boost significantly the supply of housing. Paragraph 60 reads:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

The revised NPPF looks at delivering a sufficient supply of homes and within this context Paragraph 63 stresses that the size, and type and tenure of housing needed for different groups in the community, including older people, should be assessed and reflected in planning policies. This incorporates retirement housing, housing-with-care, and care homes.

The PPG 'Housing for Older and Disabled People' (2019) reinforces the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states:

"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking" (emphasis added).

Paragraph 003 Reference ID: 63-003-20190626 recognises that:

"the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support."

Thus, a range of provision needs to be planned for. Paragraph 006 Reference ID: 63-006-20190626 sets out:

"plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require."

Older Persons' Housing Need – Central Lancashire

Policy HS1 (Strategic Policy): 'Scale of Housing Growth and Distribution of Housing Requirements' shows a total need for 23,652 dwellings in Central Lancashire over the period 2023 and 2041. This is based on the Housing Needs and Demand Assessments (HNDAs) prepared for South Ribble, Preston and Chorley in 2024.

Paragraph 4.93 of the Local Plan says that: 'It is recognised in the HNDAs that 'Central Lancashire has an ageing population that has resulted in an increased need for specialist housing for older people'. Indeed, the HNDAs for South Ribble, Preston and Chorley show that over the period 2023 to 2041 the number of people aged 65 and over is expected to increase by 29.2%, 25.8% and 37.4% respectively (ONS 2018-based population projections).

The HNDAs collectively show that there is a need for some 6,732 dwellings for older people between 2023-2041, which is approximately 28%, nearly a third, of the total housing requirement in Central Lancashire of 23,652 dwellings. Moreover, the HNDAs all highlight that there is a 'particular need for leasehold sheltered housing, enhanced sheltered, and Extra Care housing for sale and rent'.

Policy HS12: Specialist Housing

The delivery of Older Persons' Housing is addressed in the draft Local Plan under 'specialist housing' in Policy HS12 which says:

"proposals for specialist housing will be supported where they: a) are located with good access to services and facilities, especially health services and public transport; and b) make provision for open spaces, designed to meet the needs of residents; and c) have a high-quality design which is sympathetic to the surrounding area and meets the needs of residents".

Whilst we do not disagree with the sentiment of the policy, we suggest that the scale and importance of the national and local need for older persons' housing requires a specific policy dedicated to promoting older persons' housing.

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HS12: Modifications:

We therefore repeat our previous comments made in response to the Reg 18 draft and offer the following policy example for OPH.

"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.

The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”

83 Do you wish to make a representations about a different section of the Plan?

No

Chapter 6: Healthy and Inclusive Communities

125 Which policy would you like to make a representation for?

HC1 (Strategic Policy) – Health and Wellbeing

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126 Do you consider the Central Lancashire Local Plan is:

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No

Spatial Vision: Soundness/legal/DtC - d) Consistent with national policy:

No

Spatial Vision: Soundness/legal/DtC - Complies with the Duty to Cooperate:

Yes

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Policy HC1: Legal Compliance:

Policy HC1 requires the submission of a Health Impact Assessment for 'some major developments not otherwise subject to Environmental Impact Assessment'. The Council should note that there is a common misconception that older person's housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person's schemes to show that there is capacity in healthcare systems and to show that the scheme will not have a health impact, the policy should instead recognise the health benefits that delivering older people's housing can bring to individuals.

Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

A report "Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.'

In addition, specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack

adaptions such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become increasingly more difficult.

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HC1: Modifications:

Recommendation:

For the plan to be in line with national policy and effective the following wording should be added to para 2 of the policy to recognise the health benefits of older persons housing.

Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment

129 Do you wish to make a representations about a different section of the Plan?

No

Declaration

300 This is the final page of the Regulation 19 Consultation survey. After completing this page, your response will be submitted. If you wish to go back and make a representation on another part of the survey, please click 'go back' below.

Not Answered

301 If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

302 If you have answered 'yes' to the question above, wishing to participate in the hearing session(s), please outline why you consider this to be necessary:

why participation is necessary:

To expand on the information submitted with the response.

303 By completing and submitting this representation, I agree to my name (and other relevant details necessary) and representation(s) being shared and made available for public viewing.

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304 If you wish to be contacted further at future stages of the Local Plan process and to be added to the Central Lancashire and/or district individual consultation databases, please select the relevant option below

Future stages on the Local Plan - I wish to be contacted at future stages of the Local Plan process and added to the Local Plan Consultation database for Central Lancashire:

Yes

Future stages on the Local Plan - I wish to be contacted about Planning Policy matters and added to the Chorley Consultation database.:

Yes

Future stages on the Local Plan - I wish to be contacted about Planning Policy matters and added to the South Ribble Consultation database.:

Yes

Future stages on the Local Plan - I wish to be contacted about Planning Policy matters and added to the Preston Consultation database.:

Yes