

Central Lancashire Local Plan Examination

Matters, Issues and Questions

Matter 7 – Housing Policies (Policies HS5 – HS13)

Issue 7- 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 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?

Policy HS5 requires that new housing developments must make provision for open space, either on-site or through off-site contributions. The policy includes a methodology to be followed when determining the provision that a new development will be required to make. The methodology has been informed by the Central Lancashire Open Space Assessment Report 2019 ([EV04](#)), and updated information which has been prepared for the CLAs in the Central Lancashire Open Space Assessment Report 2025 DRAFT ([EV23](#)), this is considered to be a robust and up to date evidence base.

The policy requires that new housing developments must provide new playing pitches or a financial contribution to the improvement of existing playing pitches. Sport England’s Playing Pitch Calculator will be used to determine what level of contribution a site should provide. This calculator has been designed to estimate the demand that may be generated for the use of playing pitches by a new development and is a robust method for calculating required contributions.

The policy is underpinned by several evidence base documents, including:

- Central Lancashire Playing Pitch Strategy and Action Plan ([EV02](#))
- Central Lancashire Playing Pitch Strategy Assessment Report ([EV04](#))
- Central Lancashire Playing Pitch Strategy and Action Plan – Stage E Report ([EV08](#))

These documents provide a robust and up to date evidence base upon which the playing pitch element of the policy is based.

The open space requirements have been considered within the Viability Report ([IT05](#)), and the associated contributions have been allowed for within the section 106 agreement assumptions. A blended rate across the CLLP area, based on off-site contribution calculations, results in a £2,339 per unit contribution. The viability report did not conclude that the inclusion of these costs within the s106 assumptions would be unviable.

b) Is the policy sufficiently clear regarding the approach to be taken for off-site and/or financial contributions in lieu of on-site provision?

Yes, it is considered that Policy HS5 is sufficiently clear regarding when off-site financial contributions will be sought rather than on-site provision.

The specific approach regarding open space contributions is detailed within 'Step 2: Determine if provision should be on-site or off-site' on page 64 of the CLLP. The table within this section sets out when and what typologies of open space should be provided off-site. This step also details accessibility catchments per open space typology.

For playing pitches, as detailed in 'Determining the Playing Pitch Contribution' on page 66 of the CLLP, the Sport England calculator will be used to determine an estimation of the number and type of new pitches that would be required to meet demand generated by a new development. Where the calculator does not create demand for a whole pitch then a contribution towards increasing the capacity/quality of an existing site will be sought.

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?

Yes, Policy HS6 provides an effective framework for ensuring that an appropriate mix of housing will be delivered across Central Lancashire over the plan period. The policy requires all major housing developments to provide a mix of housing that accords with the housing mix needs set out in the Housing Demand and Need Assessments (HDNAs) ([HO10](#), [HO11](#) and [HO12](#)) at the settlement/parish level. The HDNAs provide robust evidence in relation to housing mix needs. The recommended mixes are based on a range of factors including future population, household projections, the range of dwellings lived in by different households and their dwelling aspirations and

expectations. This ensures that an appropriate mix of housing is provided on future developments that better reflects the housing needs of communities across Central Lancashire.

The policy provides sufficient flexibility as the housing mix requirements set out in the HDNAs are set as ranges. Furthermore paragraph 4.41 of the supporting text allows for a different mix to that required by the policy if it can be evidenced that there are site specific considerations that justify an alternative mix. It also takes into consideration the impact of the housing mix requirements on viability and allows for a different mix to be proposed on viability grounds, provided that a viability assessment is submitted alongside the planning application, demonstrating that the required mix would make the development unviable.

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?

The requirements for M4(2) and M4(3) standards are based on the recommendations in the HDNAs. The HDNAs provide evidence in relation to accessible housing needs in each authority. Also, the government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes.

Footnote 52 of the NPPF (2023) states “*planning policies for housing should make use of the government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.*” PPG ([Housing: optional technical standards section](#)) provides further guidance and states that to help bring forward an adequate supply of accessible housing, planning policies can set out the proportion of new housing that will be delivered to M4(1), M4(2) and M4(3) standard but any policies need to be based on evidence of need, viability and a consideration of site specific factors.

The evidence of need set out in the HDNAs has been prepared in accordance with PPG which identifies the factors that can be considered when demonstrating the need for M4(2) and M4(3) dwellings. Such factors include the likely need for housing for older and disabled people, the accessibility and adaptability of the existing housing stock and the size, location, type, and quality of dwellings needed to meet specifically evidenced needs.

The CLLP Viability Report ([IT05](#)) assesses the viability impact of Policy HS6. It identifies the associated costs of meeting M4(2) and M4(3) requirements but does not identify that these requirements alone will make developments unviable. NPPF (2023) paragraph 58 allows for a viability assessment to be submitted at the planning application stage if there were particular circumstances that would result in policy requirements making a development unviable.

The policy will ensure the needs for adaptable and accessible housing are met over the plan period. Policy HS12 deals with other forms of specialist housing.

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?

The minimum density requirements in Policy HS6 are based on the findings of the Central Lancashire Housing Density Study ([HO05](#)). The study provides a factual summary of the residential densities achieved on sites within Central Lancashire that have been developed or were under construction, providing an accurate, robust basis upon which estimates of future residential development gross density assumptions can be calculated. The assessment was split over five zones (rural settlements, suburban, inner urban and town centre, Preston City Centre and other rural). The zones align with planning policy designations and display similar typologies.

The densities identified in the Central Lancashire Housing Density Study are considered appropriate and justified minimum requirements for new developments. The policy makes clear that these are a minimum requirement, and developments must optimise the amount of housing developed on the site whilst also meeting the criteria included in the policy. This is in accordance with the paragraph 129 of the NPPF (2023) which requires planning policies to promote the effective use of land and encourages the use of minimum density standards.

When identifying appropriate minimum densities, BNG was a consideration, however it is not considered appropriate to lower the minimum densities as not all developments will meet the BNG requirements on-site, and the requirement will vary for each site. Criterion 4 allows for lower densities to be provided where they are clearly justified, for example to avoid harm to the character or appearance of an area, where there are constraints on a site, or where there are viability issues. On-site BNG provision may be one factor that justifies a lower density.

d) Are there any omissions in the policy?

There are not considered to be any omissions in the policy.

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?

Yes, the policy does provide an effective framework for maximising the delivery of affordable housing over the plan period. The HNDAs that were conducted for each CLA in 2024 informed the policy and the thresholds and requirements contained within it. The policy itself provides a framework which seeks to ensure an appropriate level of affordable housing is achieved as part of new housing development and with a suitable tenure split.

The affordable housing requirements are the maximum potential affordable housing levels which have the potential to be viable for the majority of housing allocations across the plan area, as per the findings of the Central Lancashire Local Plan Viability Main Report ([IT05](#)).

Policy HS7 refers to the provision of ‘Affordable Home Ownership Including First Homes’. Footnote 31 of the NPPF (2024) however states that ‘the requirement to deliver a minimum of 25% of affordable housing as First Homes... no longer applies’. As planning decisions will be made in the context of the NPPF (2024), the CLAs would welcome the removal of the reference to First Homes from the policy. Whilst the policy as proposed does not conflict with the NPPF (2024) such an amendment would create a more effective policy for the delivery of a range of affordable homes that meet the identified needs in the HDNAs.

The delivery of affordable housing across the CLLP area will be achieved by a mix of on-site provision, developer contributions on mixed market sites, and 100% affordable housing developments, the latter of which will be identified as the CLLP progresses through and post adoption. It is expected that this mix of approaches, rather than a sole reliance on the thresholds and requirements in the policy, will satisfy the annual affordable housing requirements in each CLA.

This is evidenced by figures contained within the Affordable Housing Topic Paper ([TP06](#)) which show a strong historical delivery of affordable homes across the plan area. Notably, in 2023/24 the percentage of dwellings delivered as affordable reached over

34%; above the requirement (30%) for Tier 1, 2 and 3 settlements as set out in Policy HS7.

b) Is there convincing evidence to show that affordable housing requirements, including on specialist older persons housing, would be viable? How were the thresholds for affordable housing and areas in which they apply arrived at? Are they based on comprehensive and up to date information? Is the use of “pragmatic scenarios” within the Whole Plan Viability Assessment a reasonable approach?

Is there convincing evidence to show that affordable housing requirements, including on specialist older persons housing, would be viable?

Yes, the Central Lancashire Local Plan Viability Main Report (Viability Report) (IT05) provides convincing evidence that the affordable housing requirement is viable. The Report concludes that medium and higher-value greenfield and brownfield sites (paragraph 10.2) will be viable with the requirements set out in Policy HS7. The map at 5.6 shows that most of the Plan area falls within the medium and higher value zones. These conclusions are supported by fuller explanations of the viability results in Chapter 6 and Viability RAG Rating Tables 6.11 to 6.15. The tables should be read in conjunction with the Typology Matrix in Appendix 2 and the full appraisals provided in Appendix 8.

It is acknowledged that the Viability Report (IT05) indicates that the provision of affordable housing is not viable within older person’s housing (Table 6.16 and Appendix 8 Appraisal 250121). The appraisals assume all older person’s housing is in the form of flats and on brownfield land. However, older person’s housing includes a wide range of accommodation, some of which does not include any additional support or facilities, is in the form of houses /bungalows and is developed on greenfield sites. These types of developments fall within Use Class C3 and will be addressed within the appraisals contained in Tables 6.11 to 6.15. The CLAs are open to considering amendment to the policy in respect of the affordable housing requirement for older person’s accommodation where facilities are not provided, if the Inspector is minded to do so.

Preston Strategic Sites

The Viability Report (IT05) concludes at paragraphs 10.9, 10.11 and 10.12 that the strategic sites at Fulwood Barracks (Policy SS4), Preston West (Policy SS5) and North West Preston/Bartle (Policy SS3) are either marginal or not viable (Table 7.2). However, it should be noted that the appraisals have not tested the more pragmatic scenarios used for other typologies. The Viability Report (IT05) advises that, “Improvements to

inputs such as the net-to gross ratios, density, improvements to sales values, refinement of cost estimates, and a pragmatic approach to profit will improve viability” (paragraph 10.13). The Risk Mitigation identified in the SWOT tables also highlights a variety of actions that can overcome this (pages 112 and 113).

In respect of North West Preston/Bartle (Policy SS3) (pages 112-113) it is acknowledged that some infrastructure has already been delivered, planning permissions are in place and development is ongoing. The site is in a high value zone with scope for values to increase, improving viability.

Preston City Council has been working with the landowners/agents for Fulwood Barracks (pages 114-116) and Preston West (pages 117-119). In both cases, the risk mitigation is achievable, and the landowners/agents agree that development can be viably achieved on the sites. Further information regarding Fulwood Barracks and Preston West can be found in the topic papers for these sites ([TP07](#) and [TP08](#) respectively).

How were the thresholds for affordable housing and areas in which they apply arrived at? Are they based on comprehensive and up to date information?

The threshold for requiring affordable housing in Policy HS7 is based upon major development in accordance with paragraph 65 of the NPPF (2023).

The affordable housing thresholds were arrived at and are supported by the evidence of affordable housing needs in the Housing Need and Demand Assessments ([HO10](#), [HO11](#) and [HO12](#)) and the Viability Report (IT05). The Integrated Assessment of Central Lancashire Local Plan ([CD05](#)) concludes that specifying a threshold promotes equality of access to housing and will have a positive effect (paragraph 6.68).

The starting point for the percentage of affordable housing required in Policy HS7 was the percentage currently required by Policy 7 of the Adopted Central Lancashire Core Strategy. These percentages were initially tested in the Viability Report (IT05) and the appraisals include detailed sensitivity testing demonstrating the impact of the level of affordable housing on viability.

Detailed research, including stakeholder engagement was carried out to inform the inputs used in the viability appraisals. Stakeholders had the opportunity to respond to any issues in the draft Viability Report (IT05). Evidence on the values used is set out in Appendix 3 - Residential Market Paper and the Stakeholder Engagement is detailed at

Appendix 5 and 6 of the Viability Report. The Viability Report includes evidence on each cost item, which are all within acceptable ranges, including in the pragmatic scenarios.

Is the use of “pragmatic scenarios” within the Whole Plan Viability Assessment a reasonable approach?

The use of pragmatic scenarios is a reasonable approach. They are intended to reflect the effect of cumulative impacts of improvements to values, costs, land values, and profit levels, which cannot be shown by the single dimensional sensitivity tables. It is not unreasonable that as a consequence of the ongoing regeneration of areas of Central Lancashire, environmental improvements, reductions in the cost of low-carbon technologies, and a practical approach from developers, that schemes will be able to continue to come forward over the Plan period as they have in the preceding years.

The baseline Benchmark Land Value assumptions include a level of contingency / ‘buffer’ which could be used for site remediation / abnormal costs. There is a layering-on of cost in the worst-case scenario models for land value and site remediation etc. In reality, sites will come forward for change of use that are derelict and would otherwise be a liability (i.e. not taking away valuable employment land).

In more challenging markets it is not uncommon to find local developers and entrepreneurs taking a more pragmatic view of profit in order to be ‘first-movers.’ This involves financial engineering cashflows and land / infrastructure costs. This approach has been demonstrated in the Wirral Local Plan (Inspector’s Report dated 13 March 2025) (HO20) (paragraphs .26-4.29), where the Inspector recognised that there is a distinction between viability theory and practice. Development does come forward despite what the viability theory may suggest. This is the case in the CLLP area. The same approach has been applied and accepted in principle on a number of ongoing examinations, particularly in the Black Country e.g. Wolverhampton, Sandwell, and Dudley.

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?

Yes, the Housing Need Assessments ([HO10](#), [HO11](#), [HO12](#)) provide convincing evidence to justify the proposed tenure mix for affordable homes. The Assessments provide a robust analysis of the need for a range of affordable housing tenures and the mix required to meet the identified needs in each CLAs.

Table C15 of the Chorley Housing Need and Demand Assessment 2024 (HO10) recommended a social rent / affordable rent / affordable home ownership tenure split of 46.8% / 23.8% / 29.4%. This differs from Policy HS7 which requires a tenure split of 71% social rent / 29% affordable home ownership. This in part is due to a rounding of figures, and partly due to the conglomerating of the social and affordable rent recommendations into just social rent requirements. This is due to the [Chorley Council Tenancy Strategy \(2012\)](#) requiring that any new affordable dwellings for rent should be of a social rent tenure. This is considered appropriate and is justified by Chorley Council's past social rent delivery of 41% of all new affordable homes delivered from 2010/11 to 2022/23 (TP06).

Table C15 of the Preston Housing Need and Demand Assessment 2024 (HO11) and Table C12 of the South Ribble Local Housing Need Assessment 2024 (HO12) set out the affordable housing tenure preferences. The percentages recommended for social rented, affordable rented and affordable home ownership have been included without amendment in the tenure split required within Policy HS7.

The policy includes sufficient flexibility to allow for an alternative mix in cases where it can be demonstrated that this will meet a proven need or a development would not be financially viable.

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?

Yes, the policy sets out clearly the approach to be taken when determining if an off-site contribution is appropriate and includes a methodology for calculating the commuted sum in part 13 of the policy.

A 20% supplement is justified to ensure that there is no net loss in actual affordable housing delivery as a direct result of accepting an offsite commuted sum. The supplement will finance the administration of commuted sums from the point at which a planning application is received seeking to agree a non-policy compliant scheme with offsite provision, to the verification of the merits of the evidence provided, calculation of the sums and collection, accounting and subsequent spending of those sums for the delivery of affordable homes. There are additional burdens for the CLAs when delivering affordable homes from sums which is why the policy requires on site provision unless there are exceptional circumstances. The actual enabling of the translation of those sums into actual new homes, is resource intensive for the CLAs.

The supplement is used to fund the activities required to develop a capital programme for affordable housing delivery (which should not be funded from the actual sum) for spending on the homes to be funded in lieu of what otherwise would be provided on site.

7.4 a) Is the approach to rural exception sites in policy HS8 justified? Would it provide an effective framework?

Yes, the approach to rural exception sites in Policy HS8 is justified and provides an effective framework for such development which is consistent with national policy. The policy is supportive of small rural exception sites that meet an identified local need that adjoin boundaries of rural settlements as set out in Tiers 4 and 5 of the settlement hierarchy. The criteria contained within the policy aims to guide such proposals to result in sustainable and in-character developments that address an identified local affordable housing need.

The Integrated Assessment of Central Lancashire Local Plan ([CD05](#)) found that Policy HS8 supports the development of affordable housing and will help meet the demand for such housing across the plan area. And the CLAs consider that part 2 of the policy, requiring affordable housing on rural exception sites to only be occupied by households with a local connection to the settlement / parish the development is located within, provides an effective framework to specifically address affordable housing needs within rural settlements.

b) Are there any omissions in the policy, and is it sufficiently flexible?

It is not considered that there any omissions in the policy.

The policy is in line with the NPPF (2023), specifically paragraph 82 which requires LPAs to support opportunities to bring forward rural exception sites that provide affordable housing to meet identified local needs. These sites are generally unsustainable, with limited facilities and travel modes, with the policy based on supporting identified local affordable needs, but only as an exception.

7.5 Is the approach in Policy HS9 justified and is it consistent with national policy?

Yes, Policy HS9 is justified as it is necessary to enable the provision of dwellings for essential rural workers in accordance with national policy. The criterion within the policy is consistent with the considerations set out in the PPG [Housing Needs of Different Groups](#) (Paragraph: 010 Reference ID: 67-010-20190722). If the Inspector

considers it necessary for an amendment to be made to improve the consistency with national policy, it is suggested that ‘similar land-based rural enterprises’ is added into the policy in point 1 and 2.

7.6 Is the approach in Policy HS10 justified and is it consistent with national policy?

Criterion 1 of HS10 seeks to safeguard residential amenity and community cohesion by managing the concentration of Houses in Multiple Occupation (HMOs) within established neighbourhoods. This will be achieved through a positive policy framework that aligns with paragraphs 96 and 135 of NPPF (2024). The policy also aims to promote active travel and sustainable transport choices by requiring appropriate provision for secure cycle storage.

Criterion 2 of the policy seeks to place a restriction across Preston’s Main Urban Area (MUA) for planning applications proposing to expand and/or develop new HMOs provision. The restriction on the development of new HMOs is in response to the significant and disproportionate over-provision of HMOs found to be operating within Preston’s MUA.

Preston City Council have produced an evidence paper ‘Article 4 Direction: Houses in Multiple Occupation Evidence Document, February 2025’ ([HO16](#)), to justify the introduction of the new Article 4 Direction referenced in Policy HS10, in accordance with Paragraph 54 of the NPPF (2024). The paper is also of wider relevance to Policy HS10, in that it provides the current context to justify the policy approach, including numbers and spatial distribution of HMOs, the identification of the socio-economic factors contributing to a continuing growth in HMOs and the consequential harm arising from HMOs within the authority.

As set out in HO16, the number of planning applications submitted to Preston City Council for the creation of HMO accommodation is relatively low compared to the number of HMOs found to be operating within the city (see paragraphs 6.2. & 6.7. of HO16). In Preston, a large majority of HMOs are under the C4 use class, with 611 licence exempt properties. The inference is that a significant proportion of the spread and growth of HMOs within Preston stems from permitted development which allows the conversion of C3 dwellings to C4 HMOs.

HO16 shows that the distribution of HMOs is spread across the Main Urban Area, with high concentrations in inner City wards. Evidence indicates that the currently adopted policy approach (Policy HS7 of the Preston Local Plan 2012-26 and existing Article 4 Direction) has been ineffective in managing growth and is too spatially limited with the

continued growth of C4 HMOs outside of the Article 4 areas (Source: HO16). Through continued monitoring, Preston Council have identified a further 60 additional HMOs operating within Preston's MUA since November 2024.

Policy HS10 therefore seeks to more tightly manage HMOs across the borough, supported by the introduction of a new (larger) Article 4 Direction. Based on the available data, it is likely that challenges will persist unless tighter management of HMO accommodation is introduced, and, with-it, affording greater protection of the amenity of local neighbourhoods, strengthening communities, improving housing, and working to address deprivation and health inequalities.

The approach complies with Criteria C of Paragraph 54 of the NPPF (2024), as the Article 4 Direction covers the Main Urban Area which was deemed to apply to the smallest geographical area possible. The non-urban areas are self-regulating due to higher house prices and rural locations dissuading their conversion to HMOs by potential landlords.

7.7 Does Policy HS11 provide an effective framework to ensure the delivery of an adequate supply of custom and self-build plots over the plan period? Is the policy consistent with national policy?

The policy will provide an adequate supply of custom and self-build plots. Under 'Right to Build' legislation (RTBL), Local Planning Authorities must grant planning permission for enough 'serviced plots' to meet its self-build register registrations over a rolling 3x year period. A registration year (Nov to Nov) is known as a 'Base Period.' As a worked example, the first 'Base Period' was in 2016. This necessitates that the total plots permitted by the end of 2019 (i.e. the cumulative total of 2017, 2018 and 2019), should exceed the registrations recorded in 2016.

For reference, RTBL consists of the following acts:

- Self-Build and Custom Housebuilding Act (2015)
- Housing and Planning Act (2016), Chapter 2.
- Self-Build and Custom Housebuilding Regulations (2016)
- Self-Build and Custom Housebuilding (Time for Compliance and Fees) Regulations (2016)

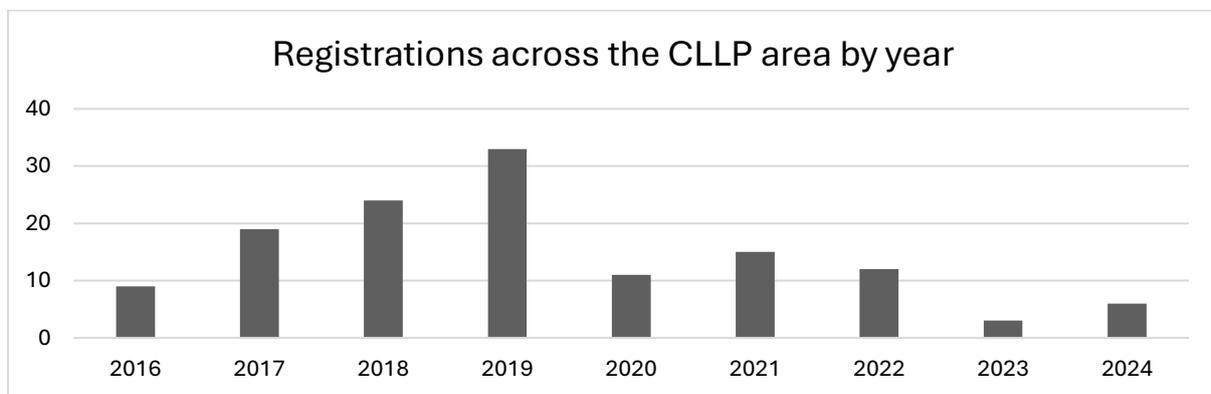
Historically, the CLAs have performed well against the RTBL. The table below* shows that every year, each district was able to meet the RTBL tests. This is already being achieved through adopted policy, which does not contain any specific policies to promote self-build/custom build.

District	Pre-test Registrations**			Net plots permitted (Total plots permitted over 3x years minus its respective 'Base Year' registrations) ***					
	2016	2017	2018	2019	2020	2021	2022	2023	2024
SR	-3	-9	-13	39	50	27	22	36	49
CBC	-3	-6	-4	17	42	87	123	138	108
PBC	-3	-4	-7	10	52	57	37	6	21

* A breakdown of this data can be made available at the Inspector's request.

** 2019 was the first year where assessment against RTBL could be made.

Overall registration numbers have historically been very low. Despite seeing an initial increase following RTBL's introduction, registrations, in recent years have been dropping. The graph below shows registrations per annum across the Central Lancashire area, including just 3x registrations in 2023. Note that applicants are free to register with as many councils as they wish. It is therefore possible that the below data also contains duplicated registrants, consequently inflating these already low figures.



NPPF (2023 / 2024) paragraph 63 necessitates that the needs of people wishing to build their own homes should be planned for. The data is however clear that demand for self / custom build plots as evidenced by each districts self-build register is very low. Furthermore, each CLA's performance against RTBL suggests that demand is consistently being met without the need for significant policy intervention.

The CLAs are aware of a trend for Local Plans to include a percentage requirement for self / custom build within larger sites. This was considered an alternative as discussed within paragraphs 6.97- 6.103 of the Integrated Appraisal ([CD05](#)). There are

disadvantages to policies of this nature, however. These include practical issues associated with marketing and construction, which can affect viability and speed of delivery. HS11 therefore strikes a balance by setting out broad support for self/build pursuant to continuing the flow of self / custom build through windfall.

7.8 Does Policy HS12 provide an effective framework that would ensure the needs for specialist housing will be met over the plan period? Does the evidence provide a robust assessment of the need for specialist housing? Given the need for older persons housing in particular outlined in the HNDAs, is a criteria based approach to meeting this need appropriate?

Yes. The Housing Needs and Demand Assessments (HNDAs) for each Council ([HO10](#), [HO11](#) and [HO12](#)) provide a detailed breakdown for different types of specialist housing, including older persons housing. The HNDA also identify a need for other forms of specialist housing in line with Paragraph 63 of the NPPF (2023 / 2024) including for those with disabilities, looked after children and in Preston, a need is also identified for meeting the needs of ethnic communities.

Additional evidence documents also exist for consideration of the need for [purpose built student accommodation](#) and also in assessing the need for travellers ([HO01](#), [HO06](#) and [HO13](#)), these documents have also fed into the development of each Council's HNDA. The requirements for these specific housing types are dealt with through Policies HS13: Gypsy, Traveller and Travelling Showpersons Needs and under policy EC10: University of Lancashire for student accommodation.

Chapter 4 of HNDA for each Council identifies the needs for different groups. For older persons, the evidence presented in the HNDAs for each council provides a breakdown of the different accommodation options and support needs, including specialist older person accommodation, this has been informed by data from Housing LIN which has also informed the development of the [Lancashire Accommodation with Support Plan 2023-2038](#) . The need for specialist older person accommodation is set out in Table 4.4 of each Councils HNDA (HO10, HO11 and HO12) and summarised in chapter 6 again for overall need for each HNDA.

The HNDAs do not state the precise nature of specialist older person dwellings to be built but do highlight the need for a range of accommodation to meet future need, as such, a criteria-based approach was considered appropriate to ensure the type of housing required could be delivered.

Each Council has a good track record in delivering this type of accommodation, including the two council led schemes in Chorley at Primrose Gardens providing 65 dwellings and Tatton Gardens providing 62 dwellings alongside one in South Ribble at Jubilee Gardens for 75 dwellings alongside a several developer-led schemes across all three council areas.

Therefore, in line with the HNDA, the plan has not prescribed the types of accommodation to be provided, and the policy as drafted is flexible to ensure that a wide range of older person accommodation can come forward, with paragraph 4.92 of the draft plan recognising the needs identified in the HNDA to be incorporated into development proposals across Central Lancashire.

In line with the above, there are a number of proposed allocations which specifically refer to the provision of specialist older person accommodation. These include Policy SS3 North West Preston/Bartle Criteria 3(f) and Policy SS5 – Preston West – Criteria i) both of which require the provision of older persons accommodation and allocations HS4.13 and HS4.14 being specially allocated to provide for older persons housing. In addition allocation HS4.10 has received planning permission in May 2025, full permission (06/2024/0889), for a 1no. three-storey residential development (Class C3) comprising 51no. retirement apartments (McCarthy Stone). These allocations will assist in meeting the requirements for older person accommodation during the plan period.

The [Penwortham Neighbourhood Development Plan](#) Policy 3: Type of Residential Property also supports the provision of 10% of units for older people including developments for affordable housing. This policy would apply to proposed allocations HS3.4 and SS6 in South Ribble. The Planning Statement prepared for outline permission for SS6 (07/2021/00886/ORM and 07/2021/00887/ORM) Pickering's Farm states policy 3 of the Penwortham Neighbourhood Development Plan will be supported and further detail will be provided at Reserved Matter stage, this is further supported by the parameters plan which identifies residential and older persons accommodation.

Not all older people or people with specific needs wish to live in specialist accommodation but wish to remain in their home. Policy HS6 requires all new dwellings to be built to M4(2) accessible and adaptable standards. This requirement provides level access and enables adaptations to the home, for example the provision of a stairlift or shower. These standards mean people can adapt their home to meet their needs and remain in the home when there is a change in health or mobility. This requirement will therefore support the provision of housing, which is suitable for a range of specialist needs, including for older people.

7.9 a) Does Policy HS13 provide an adequate framework to ensure the need for accommodation for Gypsy and Travellers and Travelling Showpeople can be met as required by national policy? Is the Central Lancashire Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2024 Update robust in its identification of needs for pitches and plots?

Yes, Policy HS13 provides an adequate framework for meeting the needs of gypsies, travellers and travelling showpeople, in accordance with the findings of the latest GTAA (2024 Update) (HO13). There is unmet need in relation to the identified need for permanent gypsy and traveller pitches in the GTAA. The Gypsy and Traveller and Travelling Showpeople Topic Paper (TP03) sets out how this unmet need will be addressed. As set out in the Topic Paper, transit needs will be met through the introduction of negotiated stopping. The CLAs are currently in the process of drafting negotiated stopping policies that will be implemented upon adoption of the CLLP. The GTAA identifies no need for travelling showpeople therefore no plots have been allocated in the CLLP, however in accordance with PPTS, criteria have been included in Policy HS13 to guide any applications that may nevertheless come forward for such use.

The GTAA is considered robust in the identification of needs for pitches for gypsies and travellers and plots for travelling showpeople. It has been prepared in accordance with the NPPF (2023) and Planning Policy for Traveller Sites (PPTS).

b) Is Policy HS13 a positively prepared, justified and effective approach to planning for the accommodation needs for gypsies, travellers and travelling showpeople? Does the Council's approach in relation to traveller sites generally conform with the expectations of Planning Policy for Traveller Sites? Has a robust and objective process been used to identify potential sites across the plan area?

Policy HS13 is positively prepared as it seeks to meet the needs of gypsies, travellers and travelling showpeople identified in the GTAA as fully as possible. Alongside the Gypsy and Traveller and Travelling Showpeople Topic Paper (TP03), it sets out a strategy for addressing those needs over the plan period. Policy HS13 is justified as it is based on robust evidence set out in the GTAA and it is also effective as the proposals are deliverable over the plan period.

The GTAA has been prepared in accordance with Policy A of PPTS. Policy HS13 has been prepared in accordance with Policy B of PPTS. The policy and the supporting text identify the overall pitch and plot need and allocate sites to meet the need. The Gypsy and Traveller and Travelling Showpeople Topic Paper identifies how the remaining

unmet need for permanent gypsy and traveller pitches will be addressed. In addition, Policy HS13 includes criteria for any proposals for gypsy, traveller or travelling showpeople sites that come forward on sites not allocated for that use in the CLLP, to ensure that any sites are sustainable economically, socially, and environmentally.

The two sites allocated for permanent gypsy and traveller pitches already have planning permission. As identified in the GTAA and Gypsy and Traveller and Travelling Showpeople Topic Paper, additional need over the plan period has arisen from these authorised sites as well as two unauthorised encampments in Central Lancashire. The Topic Paper sets out how this additional need will be addressed. Should any further sites be required to meet the need, potential sites will be identified in accordance with the SHELAA methodology and using the criteria in Policy HS13.

c) Are the requirements of the policy justified, clear and would they be effective?

As identified in the responses to the previous questions on this policy, the requirements of the policy are considered to be justified as they are based on up-to-date robust evidence and are in accordance with national planning policy, in particular PPTS. The requirements are clear in that the policy protects existing authorised sites from alternative uses, sets out that transit provision will be met through negotiated stopping and provides criteria against which any future proposals will be assessed. The requirements of the policy are also effective, as alongside the strategy set out in the Gypsy and Traveller and Travelling Showpeople Topic Paper, they will ensure that the needs identified in the GTAA are met over the plan period.

d) Are there any omissions in the policy, and is it sufficiently flexible?

As there is unmet need for permanent gypsy and traveller pitches in both Chorley and Preston, at present the policy does not identify sites to address the identified need in full. A clear strategy for addressing this unmet need is set out in the Gypsy and Traveller and Travelling Showpeople Topic Paper.

Representations were received to the Regulation 19 consultation regarding the additional needs arising over the plan period from the authorised site in Chorley, requesting that additional land is allocated adjacent to the site. The Council is of the view, as set out in the GTAA, that this additional need can be met on the existing site. In relation to the needs arising from the unauthorised site, the Council were awaiting the outcome of a planning application at the time the CLLP was submitted. This planning application has subsequently been refused, however it is subject to a planning appeal, therefore the Council will await the outcome of the appeal before determining if an

alternative site needs to be identified. The appeal is scheduled for the end of November. The principle of residential development on this site has been established as it has permission in principle for 9 dwellings and is part of a proposed housing allocation in the CLLP (HS2.35). The planning application was refused on design grounds.

Preston City Council, with the support of Arc4, are working with the occupiers of one of the unauthorised sites to regularise and potentially extend the site and are also working with landowners with a view to extending an authorised site. The work on these sites was at too early a stage to include within Policy HS13.

The policy is considered sufficiently flexible. It does not prevent additional sites coming forward for permanent gypsy and traveller pitches or travelling showpeople plots. The introduction of negotiated stopping also provides a more flexible approach to addressing transit needs than allocating specific pitches.