

## 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?

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?

#### **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?**

1. The HBF supports the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. Nevertheless, it considers that the policy as worded, is not sufficiently flexible as the policy would simply not be workable if all sites were expected to rigidly adhere to a set mix. Indeed, rather than meeting need, housing delivery may then be compromised or stalled due to overly prescriptive requirements.
2. Whilst the need for a certain mix is an important consideration; to make the policy effective, the mix should also be informed by the location and scale of the site, site viability as well as commercial/market considerations. We consider that such wording could be used:

*“On all new housing developments, the Councils will seek to secure an appropriate mix of dwelling types and sizes, taking account of existing imbalances in the housing stock, site characteristics, viability, economic and market considerations.”*

#### **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?**

3. As outlined in our response to the Regulation 19 consultation, the HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. If the Councils wish to include optional technical standards, then it needs to provide evidence in line with what is contained in the PPG to justify its approach (Reference ID: 56-007-20150327).
4. It is noted that the explanatory text to Policy HS6 indicates evidence contained in the 2024 Local Housing Need and Demand Assessment Updates [HO10, HO11 and HO12] provides the justification for the approach. However, whilst these provide some demographic analysis, there does not appear to be specific evidence of whether existing properties can be adapted (just data on current dwellings which have been adapted) and it is unclear on whether the analysis examines in sufficient

detail the type and tenure of such homes. The HBF would therefore query whether the need for the optional technical standards has been robustly demonstrated.

5. The HBF notes that Part 1(c) of the policy looks for the provision of a proportion of Part M4(3) wheelchair accessible homes. Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings. The PPG notes that Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (Reference ID: 56-009-20150327). It should therefore be clarified as to how this part of the policy is to be implemented.
6. The Local Plan Viability Report [IT05] also highlights the significant additional cost of providing Part M4(3) wheelchair accessible homes (£9,492 (apartments) and £27,241 (houses) per unit). It is also noted that M4(3)(b) homes are not always attractive to buyers or residents and inevitably require further adaptations to suit the individual needs. The other additional costs are listed as £1,109 (apartments) and £626 (houses) per unit for accessible and adaptable housing M4(2) Category 2.
7. The HBF also notes the significant viability challenges that are identified within Section 6 of the Local Plan Viability Report [I05]. The HBF notes that the Lower Value Brownfield typologies, lower value greenfield typologies and the Preston City Centre typologies are not viable; and that the medium value brownfield typologies, the medium value greenfield typologies, the higher value brownfield typologies and the higher value greenfield typologies are either not viable or marginal. This would indicate that additional optional technical standards are only exacerbating this situation. It should be noted that paragraph 10.5 of the Local Plan Viability Report states:  
  
*“All things being equal, if costs increase due to e.g. higher design standards, then the value of the land on a residual basis should reduce. To a certain extent this is an inevitable consequence of higher building standards. However, if the cost is too great or not phased-in over an appropriate time frame the impact on the land value could be too great and stymie development.”*
8. It doesn't state at what point the impact would be too great, but given the results of the viability appraisals, the HBF considers the imposition of optional technical housing standards is not warranted from a viability perspective.

**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?**

9. The HBF supports the efficient use of land and notes that this is a key tenet of the NPPF (Section 11). The level of flexibility in this policy is supported and the HBF is keen to see this pragmatism being used when determining planning applications.
10. The HBF notes that the Central Lancashire Housing Density Study [HO05] has been used as the primary source of evidence when considering minimum site densities. Whilst of some use, the document inevitably looks at what has been historically achieved. Given that previous developments will not have had to factor in more recent regulatory/policy requirements such as biodiversity net gain, the provision of M4(2) and M4(3) standards, larger homes through nationally described space standards, the provision of cycle and bin storage, parking requirements (including visitor bays), any implications of design coding and the provision of trees and canopy proportions, plus

modern highways requirements (cycling/wheeling infrastructure), then the Density Study may be overoptimistic in the densities that may be able to be achieved on new development sites.

11. The HBF therefore recommends that some degree of sensitivity analysis is provided in relation to the densities which are recommended.

**d) Are there 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?**

12. As outlined in our statement in relation to Matter 3, each constituent authority has calculated its net affordable need differently (in terms of how the backlog is addressed and assumptions for supply – see HO10, HO11 and HO12). The Councils will need to explain fully why this approach was taken. The HBF therefore considers it is unclear at this point whether the level of affordable housing in the Local Plan is sufficiently robust.
13. As outlined in our answers to (b) and (c) below, the HBF's view is that a combination of viability concerns and inflexibility in the approach to tenure mix may hamper the ability to deliver affordable homes over the plan period. This would then fundamentally undermine the effectiveness of the Local Plan.

**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?**

14. Our representations made at the Regulation 19 stage outline the significant viability challenges that are identified within Section 6 of the Local Plan Viability Report [105]. In particular, the HBF notes that the Lower Value Brownfield typologies, lower value greenfield typologies and the Preston City Centre typologies are not viable; and that the medium value brownfield typologies, the medium value greenfield typologies, the higher value brownfield typologies and the higher value greenfield typologies are either not viable or marginal, when considered in development appraisals.
15. The HBF notes that many viability challenges remain even in the 'pragmatic scenario'. The Viability Report itself is clear that *'all typologies within the lower value zones are unviable, along with all typologies assessed within Preston city centre, where high build costs and site constraints present challenges to viability'*.
16. The danger is therefore that without any improvement in the viability situation, the delivery of homes will be frustrated as it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy is incorrect.
17. The HBF considers that the Council should consider increasing the housing requirement to help to address this need as set out in the PPG (Reference ID: 2a-024-20190220). The HBF also recommends that the Councils look again at their spatial strategy, for example, if more sites were allocated in areas where the viability is greater, this would help to increase the level of affordable housing provided.

**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?**

18. The HBF notes the tenure split contained in the Local Housing Need and Demand Assessment Updates [HO10, HO11 and HO12] and its translation to Policy HS7. We would advise that whilst a useful starting point, the Councils should approach site specific tenure split in a pragmatic and flexible way that does not add a financial burden on developers. Currently we consider the policy is overly prescriptive and onerous in what should be provided if the tenure split shown cannot be achieved.
19. Recently many of our members have had issues in delivering affordable housing as there simply has not been the demand from Registered Providers to take the units on a development site (see link: <https://www.hbf.co.uk/news/8500-new-affordable-homes-risk/>). This has meant that many sites have stalled as a result of this. The HBF is concerned that the rigidity of this policy may mean this issue is repeated in Central Lancashire, which would undermine the Local Plan in delivering the housing that the area requires. Greater flexibility in how these tenure splits are provided should therefore be introduced.
20. In relation to 100% affordable housing sites themselves, the requirement for 10% affordable home ownership in paragraph 66 of the NPPF does not apply. Given the likely nature of such sites being brought forward by affordable housing providers (who predominantly specialise in social/affordable rent products), a requirement of affordable home ownership will likely frustrate delivery. Therefore, flexibility and pragmatism should also be required in these cases.

**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?**

21. The HBF does not support this approach. This is because in some cases, it may not be possible to provide on-site affordable housing for perfectly legitimate reasons, and it should not be that such sites are unjustly penalised for this by being charged an additional 20%.
22. Given the viability issues demonstrated in the Local Plan Viability Report, the 20% supplement may be the difference between a site being deliverable or not.

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

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

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

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

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?

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?

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 Traveling Showpeople Accommodation Assessment 2024 Update robust in its identification of needs for pitches and plots?

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?

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

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