

Savills on behalf of the Defence Infrastructure Organisation

Examination into the Central Lancashire Local Plan 2023-2041

Hearing Statement

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?

1. It's understood that the Central Lancashire Playing Pitch Strategy is currently being updated which is due to be published in November 2025. As such, we reserve the right to comment on this document moving forward which forms part of the evidence base for Policy HS5.

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?

2. Flexibility should be applied in terms of the housing mix requirements to ensure that site specific issues can be responded to and to avoid unintended adverse impacts on the deliverability of sites.
3. The policy as currently drafted is over prescriptive and does not allow sufficient flexibility to account for the complexities of delivering comprehensive redevelopments of Sites which contain numerous designated heritage assets, such as strategic site Fulwood Barracks (SS4). Additional flexibility is therefore recommended in the policy wording as follows:
4. Amend limb 1 as follows:
 1. All market and affordable housing developments of 10 or more dwellings, or on sites of 0.4 hectares or greater, across Central Lancashire must:
 - a) Provide a mix of dwelling types and sizes ~~to~~ **that seeks to** address the needs for that location as identified in the Housing Need and Demand Assessments, **or other relevant evidence, as a starting point. Site specific characteristic may justify a divergence from this mix; and**
 - b) Build all dwellings to M4(2) accessible and adaptable standard **unless site specific characteristic mean that this is not possible; and**
 - c) Build at least 4% of affordable dwellings on sites in Preston and Chorley, and at least 5% of affordable dwellings on sites in South Ribble, to M4(3) wheelchair accessible standard.
5. The proposed amendments seek to add additional flexibility to allow the site specific characteristics of sites to be reflected in the mix and accessibility standards, whilst maintaining the aim of the Policy

overall. Whilst the need for a certain mix is an important consideration, in order to make the policy effective the mix should also be informed by the site specific location and scale, site viability, and commercial 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?

6. It may not be possible for repurposed designated heritage assets to fully meet the requirements of M4(2) and therefore the implementation of this policy may render such project undeliverable. Additional flexibility in this respect is therefore recommended.
7. For brownfield sites with heritage assets whereby viability is more challenging, the imposition of optional technical housing standards is not considered to be 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?

8. Draft policy HS6 outlines that in order to promote the effective use of land the suggested minimum gross densities are required on all housing developments. The figures are provided on a gross density dwellings per hectare basis.
9. The flexibility included within draft Policy SP6 to support lower densities in specific circumstances is welcomed to account for site specific considerations.
10. Pragmatism is encouraged in the application of this policy and the aspired densities enclosed therein.

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?

11. Viability work undertaken by the Councils suggests that flexibility may be required in the Draft Policy HS7 to ensure deliverability. Draft Policy HS7 refers to viability assessments being undertaken however it does not set out what the implications of those assessments may be if a development is found to be unviable which creates uncertainty for applicants and decision makers in terms of the correct course of action.
12. Paragraph 35 of the NPPF is clear that policies setting out contributions expected from development should not undermine the delivery of the plan. Additional wording is therefore recommended as follows:
In the event that independently corroborated evidence clearly shows that development is unviable, options should be assessed in relation to amendments to the affordable housing tenure mix and / or overall provision of affordable housing in order to ensure deliverability. An acceptable solution should be agreed with the Council based on the evidence available on viability and need for specific affordable housing tenures.
13. The suggested amendment seeks to ensure that there is a clear way forward in such an event, adding clarity and safeguarding deliverability.

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 in 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?

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?

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?

14. It may be not be possible to provide on-site affordable housing for legitimate reasons and it seems unjustified that in such circumstances, sites are penalised for this by being charged an additional 20%.
15. Given the marginal viability of some sites, this supplement could be the difference between a site being deliverable or not.