

Hearing Statement – Matter 7 (Housing Policies)

Central Lancashire Local Plan Examination

On behalf of L&Q

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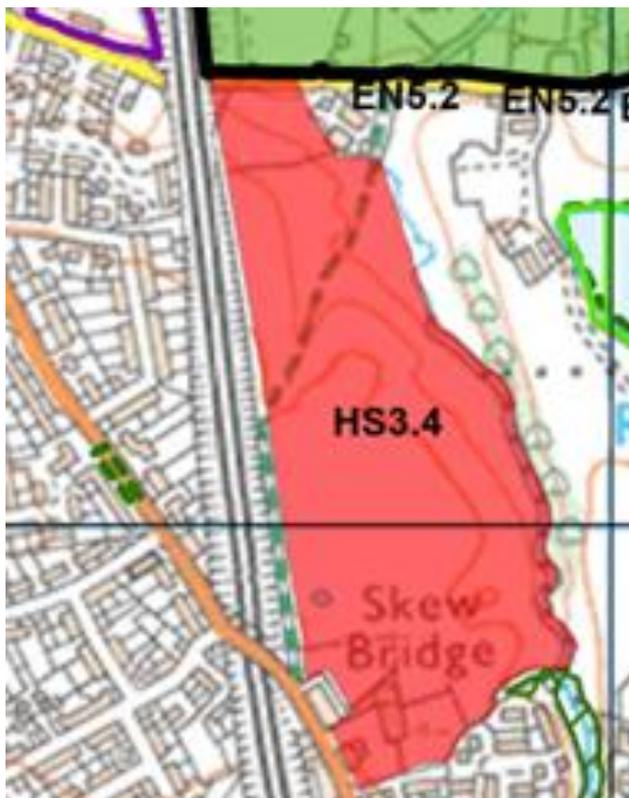
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1. Introduction

- 1.1. Pegasus Group has been instructed on behalf of their client, L&Q, to prepare Hearing Statements to the Central Lancashire Local Plan Examination (EiP) in support of their land interests in South Ribble. Namely, L&Q has a development option on the draft South of Factory Lane allocation (Reference: HS3.4). The site is currently allocated for development of circa 250 dwellings – which L&Q fully support.

Figure 1: South of Factory Lane Allocation (HS3.4)



- 1.2. L&Q are a profit-for-purpose housing association, with their north-west operation based in Trafford. Their mission is to make society fairer for everyone. Their vision is to that everyone deserves a quality home that provides them with the opportunity to live a better life. Their purpose is to provide homes and neighbourhoods everyone can be proud of.
- 1.3. L&Q provide a range of home types, including homes for shared ownership and open market sale. In the north-west they currently manage approximately 9,000 homes for social and affordable rent and put their customers at the heart of everything they do. That's why, as well as building and managing quality homes; L&Q look after the families that live in them and their community.
- 1.4. This Statement deals with Matter 7, which addresses the following issue:

"Issue 7 – Does the Plan set out positively prepared housing policies which are justified, effective and consistent with national policy?"

2. Question 7.2

Policies HS5–HS13

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?

- 2.1. In relation to housing mix, L&Q recognise the need to provide a mix of house types, sizes and tenures and is supportive of providing a range and choice of homes to meet the needs of the local area. However, the policy as currently drafted does not provide sufficient flexibility and is overly prescriptive.
- 2.2. Part 1a) of the policy states that developments must 'provide a mix of dwelling types and sizes to address the needs for that location as identified in the Housing Need and Demand Assessments'.
- 2.3. This wording is overly prescriptive – as site-specific considerations mean that whilst the housing mix requirements outlined in the Housing Need and Demand Assessments are an important consideration, to set rigid mix requirements can lead to deliverability issues.
- 2.4. To ensure the policy is effective, housing mix matters also need to acknowledge changing circumstances and other site-specific considerations – including viability, market considerations and the location and scale of the site.
- 2.5. We therefore echo the sentiments of the HBF that additional flexible wording needs to be added to Policy HS6, which notes that the findings of the housing need and demand assessments should be considered, alongside viability and market considerations, when determined the suitable housing mix for any specific site.
- 2.6. Ensuring a level of flexibility in the policy will ensure that the Plan remains effective.

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?

- 2.7. No – the evidence base is not sufficiently robust to introduce this. The draft policy requires all residential schemes to be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations. There is no flexibility in this requirement. It also goes on to require 5% of new homes in South Ribble to be wheelchair accessible in accordance with Part M4(3a).
- 2.8. The PPG¹ identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type, and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.

¹ Reference ID: 56-007-20150327.

- 2.9. It is noted that future needs are covered in the South Ribble Local Housing Needs and Demand Study (Ref: H002) and its update in 2024 (Ref: HO12). It does not appear that the accessibility and adaptability of the existing stock, how the needs vary across different housing tenures, nor the overall viability are covered in these reports. Furthermore, paragraph 4.49 of the 2024 report (Ref HO12) recommends that 4% of all new dwellings should be built to M4(3) standards. The policy currently recommends 5%, therefore is not reflective of the latest evidence in order to be justified.
- 2.10. In respect of viability, there are some significant viability challenges set out within section 6 of the Viability Report (February 2025) (Reference: ITO5).
- 2.11. L&Q also notes the Optional Technical Standards Paper (TPO5a), which seeks to set out the delivery of NDSS properties in the past. This needs to be set in the context of an adopted Plan which does not require NDSS and a national position where these standards are not mandatory. If the Government had wanted them to be, they would have made them so. Nevertheless, TPO5a does not provide the outstanding evidence in respect of the introduction of M4 standards.
- 2.12. The introduction of the optional technical housing standards is not supported by the evidence base and therefore not justified.

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?

- 2.13. The policy proposes minimum densities for various locations, of which the relevant density for the Factory Lane allocation (HS3.4) is 27 dph. L&Q are currently preparing a planning application on site and can confirm that the minimum density can be achieved on the HS3.4 allocation.
- 2.14. More generally, it is important that the indicative density figures set out in Policy HS6 should only be used as a guide – and the Council should be flexible in their use to take account of individual site characteristics, the development proposed and also viability. Whilst the use of minimum densities is in line with the efficient use of land (section 11 of the NPPF), it is considered that some of the figures may be over-optimistic.
- 2.15. In our view, there should not be an over-reliance on minimum density standards to meet housing needs. It represents an unrealistic strategy and as currently drafted this part of the plan lacks flexibility so is unlikely to be effective.

d) Are there any omissions in the policy?

- 2.16. No comment.

3. Question 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?

3.1. L&Q raise concerns that the affordable housing needs of Central Lancashire will not be met in full. The evidence sets out an overall gross affordable need of 728 dpa. Given the Council's approach and seeking to deliver a suppressed housing requirement, the affordable homes required would be in excess of 50% of the overall requirement. As such, from the evidence presented, the Plan will simply not deliver the amount of affordable housing needed and additional sources of land supply must be identified.

3.2. L&Q can confirm that policy compliant affordable housing can be delivered on the HS3.4 allocation.

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?

3.3. As noted in the Council's evidence, there are some significant viability challenges set out within section 6 of the Viability Report (February 2025). This includes 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 against a set of fully policy compliant appraisals, realistic land values and a 20% profit. These locations are where a reasonable amount of housing sites are identified

3.4. It is unrealistic to negotiate viability on every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is simply set too high. This will jeopardise future housing delivery and could result in further shortfalls in the overall supply of houses and the delivery of affordable housing.

3.5. As drafted, the Plan will not be effective in delivering the overall affordable housing requirements in Central Lancashire.

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?

3.6. L&Q do not support the current wording at part 5 of the policy, which states 'the following tenure must be provided unless it can be robustly demonstrated that an alternative split meets an independently assessed proven need, or it is demonstrated to the Council that the development would not otherwise be financially viable.' It is then confirmed that South Ribble should deliver 77% Social Rent and 23% Affordable Home Ownership.

3.7. The current policy wording is far too prescriptive. Whilst the wording in respect of viability considerations is helpful, this is not the only reason why the proposed tenure split may not



be appropriate on every site. This could include market demand and the size or location of the site. Such as prescriptive approach could lead to real deliverability issues – in a Plan which is already meeting a suppressed housing requirement and ambitious density targets.

- 3.8. The blanket approach to tenure split is therefore inappropriate. Greater flexibility in how these tenure splits are provided should be introduced to ensure that the Plan remain effective.

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?

- 3.9. No comment.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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