

Hearing Statement

Matter 7 – Housing Policies

November 2025

Representor: The Cooper Family

Representor ID: A18

Site: Land at Toy Farm, Euxton

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1. Introduction

- 1.1 This Hearing Statement relates to Matter 7 and is submitted by The Cooper Family, who have submitted consultation responses at each consultation stage.
- 1.2 The Cooper Family are participating in the Examination process as they are promoting land at Toy Farm in Euxton. A Development Statement related to the merits of the site in the context of the need to identify additional housing sites in order to meet housing needs in full was provided at Appendix 1 to their Regulation 19 consultation response.
- 1.3 The Development Statement confirms that the land at Toy Farm is deliverable and a sustainable location towards which new homes should be directed.
- 1.4 We trust that this Statement assists the Inspectors in respect of the Examination.

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

- 2.1 The Cooper Family does not have any specific comments to make in respect of Questions 7.1, 7.2 or 7.4 – 7.9. This Hearing Statement therefore provides a response to Question 7.3 only.

Q7.3

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?

- 2.2 Policy HS7 establishes thresholds and percentage requirements for the delivery of affordable housing on new developments (e.g. 30% affordable on major developments in most areas, 10% in rural areas on certain sites, etc.). In principle, HS7 is an appropriate framework to secure on-site affordable housing and thus maximize delivery over the plan period.
- 2.3 However, affordable housing needs will not be met if the current housing requirement is to be maintained, as set out in our Matter 3 Hearing Statement responding to Q3.3. Even if Policy HS7 is rigorously applied, the total affordable housing delivery falls short of identified need. Therefore, whilst HS7 has been drafted with the aim of maximising affordable housing delivery (whilst taking viability considerations into account), the underlying issue is the insufficient housing requirement.
- 2.4 In that sense, Policy HS7 alone cannot overcome the shortfall caused by the housing requirement identified under Policy HS1. We do support the Councils for including a policy that seeks to capture a requisite level of affordable units from all developments where viable to do so and as a bare minimum that is necessary to try and meet identified needs. If the Policy HS1 housing requirement were to be increased (as we argue it should be), Policy HS7 would then be a more effective tool to help meet affordable needs in full.
- 2.5 As it stands, affordable housing needs will not be met, so the Plan is not positively prepared in that regard.

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?

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- 2.6 The Whole Plan Viability Assessment tested various “pragmatic scenarios” for affordable housing. We are aware that especially on brownfield sites or strategic sites that carry a significant infrastructure burden, achieving 30% affordable may not always be viable. The Councils have wisely differentiated requirements by area (e.g. 10% in inner Preston), which suggests viability evidence was taken into account.
- 2.7 The Cooper family is not challenging the specifics of the viability evidence. The concern is that if some sites deliver less than policy-compliant affordable housing because of viability challenges, the ability to achieve 438 dpa affordable housing need is put at risk. The policy includes an exception mechanism, as would be expected, meaning that any affordable housing delivery is “subject to viability”, meaning that the minimum 30% threshold is not guaranteed.
- 2.8 We have seen in practice (through planning appeals and applications in Chorley) that viability can reduce affordable delivery on certain sites (e.g. many brownfield sites in Chorley have delivered 0% due to demonstrated viability issues). So while HS7 sets an ambitious target, there should be contingency built in to the overall housing requirement to help offset against sites that face viability challenges.

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?

- 2.9 The Cooper have no specific comments to make in respect of this question.

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?

- 2.10 The Cooper have no specific comments to make in respect of this question.
- 2.11 Overall, Policy HS7 has the potential to be a positive policy, but its effectiveness is limited by the Plan’s intended suppression of the housing requirement. To maximize affordable housing delivery, the approach must either be to enforce higher delivery percentages (which viability may not allow) or have more sites identified as housing allocations that are capable of delivering 30% provision (which means identifying a higher housing requirement). The Cooper family are of the clear view that it should be the latter.