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14/04/2025

Dear Planning Policy Team,

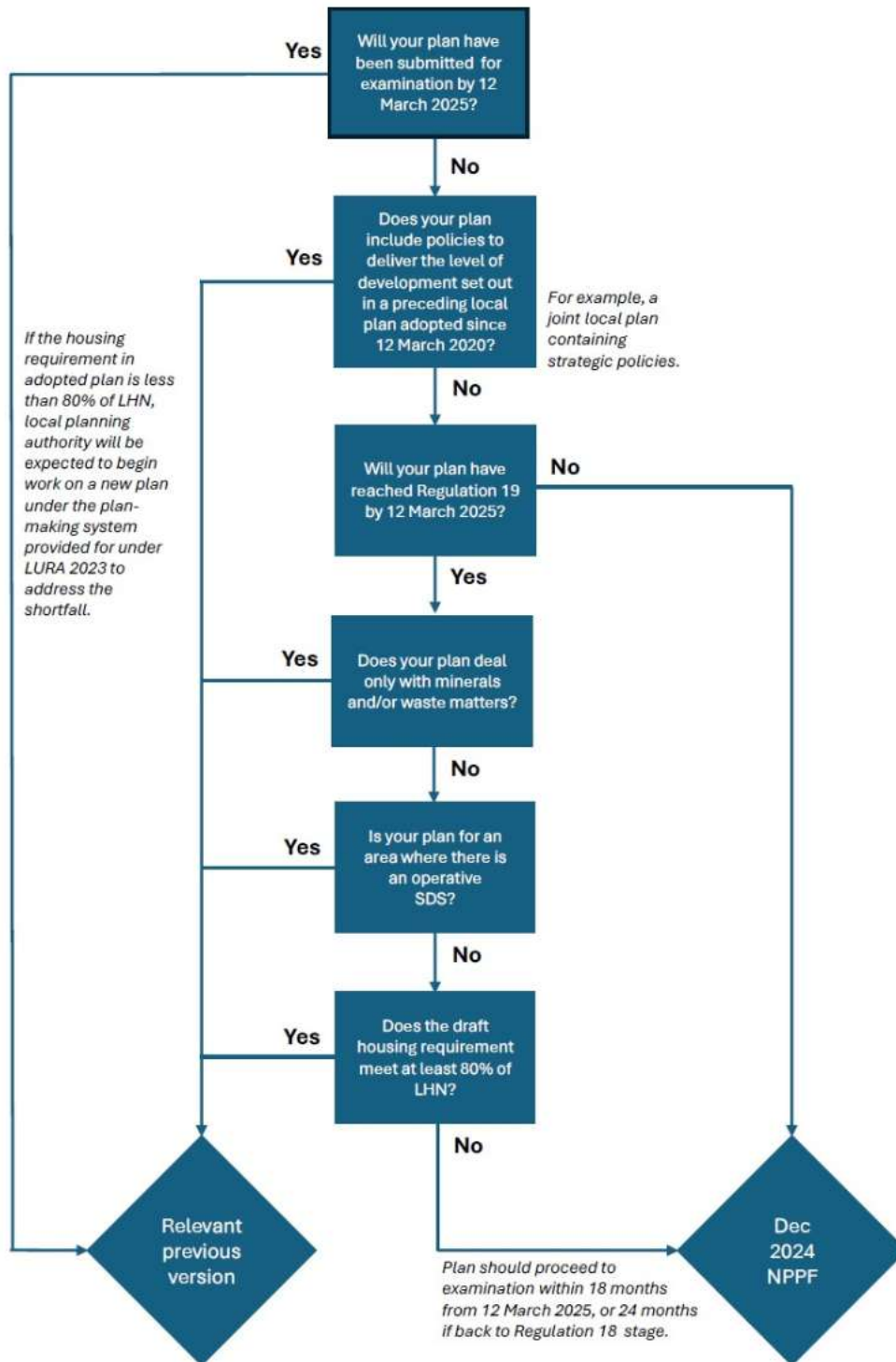
CENTRAL LANCASHIRE LOCAL PLAN 2023-2041: PUBLICATION DRAFT

1. Thank you for consulting with the Home Builders Federation (HBF) on the Central Lancashire Local Plan 2023-2041 Publication Draft.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. We would like to submit the following comments in relation to Government policy and selected policies within the Publication consultation document. These responses are provided to assist the Central Lancashire Local Plan Team in the preparation of the emerging local plan. The HBF is keen to ensure that Central Lancashire produces a sound local plan which provides appropriate policies for the area.
4. The HBF notes a new NPPF and new standard method for calculating housing need has been published prior to this consultation on the Central Lancashire Local Plan, and that this may have implications for the production of the Plan and the policies it contains. The transitional arrangements set out in the NPPF¹ state that *'for the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025 and its draft housing requirement meets at least 80% of local housing need; . . .'* The Government Response to the proposed reforms to the NPPF and other changes to the Planning system consultation² provides a helpful flow diagram of the transitional arrangements, which is copied as Figure 1 below.

¹ NPPF 2024 paragraph 234

² <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/outcome/government-response-to-the-proposed-reforms-to-the->

Figure 1: Transitional Arrangements



[national-planning-policy-framework-and-other-changes-to-the-planning-system-consultation#the-future-of-planning-policy-and-plan-making](#)

5. The HBF also notes that the 'Building the homes we need' the Written Ministerial Statement (WMS) from Angela Raynor on 30th July 2024 highlights the importance of everyone local authority having a development plan in place, and states that for plans at an advanced stage of preparation (Regulation 19), allowing them to continue to examination unless there is a significant gap between the Plan and the new local housing need figure, in which case we propose to ask authorities to re-work their plans to take account of the higher figure.

6. The Government's is clear that its overarching housing policy seeks to deliver 1.5 million new homes over the course of the Parliament and the introduction of the new stock-based standard method is intended to result in a significant uptick in the delivery of new homes. For new housing to be delivered within the Parliament, work to support this increase must start immediately. It is the HBF's understanding that the intention of the 80% allowance in the standard method was for it to be a test to be applied to Plans that were an advanced stage of preparation and were progressing and had already set a housing number. If, for these Plans, the housing figures were less than 80% of the new standard method the Council needed to revisit the housing figures but if was 80% or more, then the benefits of continuing with a plan and getting a plan in place, albeit with lower numbers, outweighed the disbenefits of not having a Plan. The 2024 NPPF clearly sets out that Plans at Reg 19 stage should be meeting **at least 80%** of the standard method, not be planning for 80% of the standard method. Other national policy in the NPPF, PPG and elsewhere is clear that the Government seeks to increase house building, and therefore, Plans that are only aiming to deliver 80% of their part of the national requirement cannot be consistent with the wider Government housing policy objectives.

Plan Period

7. The plan period appears to be 2023 to 2041. The HBF considers that the Council should ensure that the Plan covers a period of 15 years from the adoption of the Plan. The NPPF³ states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery. To ensure that the Plan covers the full 15 years on adoption, this requires the Plan to be adopted in 2026. The HBF considers that this is unlikely, and the Plan period should be extended until at least 2042.

Vision and Objectives

8. The Vision suggests that in 2041 and beyond Central Lancashire will have a wide range of high quality sustainable new housing and supporting infrastructure will meets the needs of our diverse communities, delivering vibrant and distinct places. Objective 3: Sustainable Communities looks to create healthy, vibrant, safe and sustainable communities with a diverse range of housing to meet future needs, providing a scale and mix of housing types and sizes and variety of tenure in arrange of locations to meet economic aspirations and local housing needs. The HBF generally supports

³ NPPF December 2024 Paragraph 22 / NPPF December 2023 paragraph 22

this element of the vision and Objective 3 and considers that meeting the current and future housing needs should be a key part of the vision and objectives for the Plan.

Policy SS1: Development Patterns

Policy SS1 is not considered to be sound as it is not positively prepared, justified, or consistent with national policy for the following reasons:

9. This policy states that new housing will be focused on the most sustainable locations in Central Lancashire, where development can, amongst other elements, help regenerate our City and Town centres; and make the best use of well-located previously developed land and buildings.

10. The HBF considers that whilst it is appropriate to support and maximise the use of previously developed sites and sites in and around the town centre this needs to be done in the right way and should not prevent the delivery of other sustainable sites or sustainable developments. The Council will need to be able to demonstrate with evidence that this strategy is deliverable and developable over the Plan period, will meet the varied housing needs and will not lead to a shortage of homes being delivered.

Policy SS2: Settlement Hierarchy

Policy SS2 is not considered to be sound as it is not positively prepared, justified, or consistent with national policy for the following reasons:

11. This policy sets out the settlement hierarchy for Central Lancashire, with Preston as the first tier, then the Key Service Centres (Leyland and the South Ribble Urban Area, and Chorley Town), the Urban Local Service Centres (Adlington, Buckshaw Village, Clayton Brook / Green, Clayton-le-Woods, Coppull, Euxton, Longridge, Longton and Whittle-le-Woods), Rural Local Service Centres (Broughton, Croston, Eccleston, Grimsargh, Higher Walton, Hutton, New Longton and Walmer Bridge) and Smaller Rural Villages and Hamlets.

12. The HBF would expect the Central Lancashire Councils to provide an appropriate settlement hierarchy which provides a logical hierarchy and allows for a suitable and sustainable spatial distribution of sites, provides an appropriate development pattern and supports sustainable development within all market areas.

Strategic Site Allocations

13. The HBF has no comments on these allocation policies other than to say the proposals must be deliverable, and it is important that housing delivery is effectively monitored so that if housing monitoring shows delays to housing delivery across the Borough action is taken to address this as soon as possible.

Policy HS1 (Strategic Policy): Scale of Housing Growth and Distribution of Housing Requirements

Policy HS1 is not considered to be sound as it is not positively prepared, not justified, not effective

and not consistent with national policy for the following reasons:

14. This policy states that the housing requirement for Central Lancashire is 23,652 homes to be delivered in the Local Plan period between 2023 and 2041, at an annual average of 1,314 homes. It goes on to provide the distribution of the housing requirement across the three authorities as 6,012 homes in the Chorley area (334 dwellings per annum (dpa)), 9,360 homes in Preston (520dpa) and 8,280 homes in South Ribble (460dpa).

15. The Central Lancashire Housing Study Update (Dec 2024) sets out a range of scenarios and their outputs in terms of dwellings, these range from 705dpa from the SNPP-2014 scenario through to 1,313dpa from the PG-5yr scenario. However, it is noted that the PG-5yr scenario is excluded from the Study as a reasonable alternative. It also sets out the local housing need (LHN) based on the Government's previous standard underpinned by the 2014-based household projections, this identifies an LHN of 944dpa Central Lancashire, 506dpa in Chorley, 269dpa in Preston and 169dpa in South Ribble. The report suggests that the recommended scenario is the Employment led scenario which corresponds to 1,237dpa, which breaks down to 410dpa for Chorley, 441dpa for Preston and 386dpa for South Ribble. It is noted that whilst this may be what the overall housing figure is based on, the proposed split is not continued into the Local Plan policy. The Plan suggests that the distribution of the overall housing requirement has been undertaken in the context of the spatial strategy including the settlement hierarchy. As set out previously, the HBF considers it is particularly important that the Council can demonstrate with evidence that this strategy is deliverable and developable over the Plan period, will meet the varied housing needs and will not lead to a shortage of homes being delivered.

16. The NPPF⁴ states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method set out in the PPG. The NPPF⁵ also states that the requirement may be higher than the identified housing need, if for example, it includes provision for neighbouring area, or reflects growth ambitions linked to economic development or infrastructure investment.

17. The HBF notes the numbers of documents that have been produced to support growth ambitions and economic development in Lancashire including the Economic Strategy, The Lancashire Growth Plan⁶, and Invest in Lancashire⁷ which identify economic growth projects such as Preston 35 the regeneration plan for Preston, which has seen Government funding via Levelling Up, Towns Fund and Transforming Cities Programme, and Samlesbury Enterprise Zone, which is set to become a leading centre for world-class research, innovation and technology. It is noted that the National Cyber Force (NCF) will be establishing its future headquarters in Samlesbury, helping to grow technology, digital and defence sectors, with up to two thousand people working there by the

⁴ NPPF December 2023 Paragraph 61 / NPPF 2024 Paragraph 61

⁵ NPPF December 2023 Paragraph 67 / NPPF 2024 Paragraph 69

⁶ <https://lancashire-cca.gov.uk/sites/default/files/2025-03/Lancashire%20Growth%20Plan%20consultation%20version.pdf>

⁷ <https://investinlancashire.com/wp-content/uploads/2024/05/Lancashire-Investment-Prospectus-2024-low-res.pdf>

2030s. The HBF recommends that the Central Lancashire authorities should give further consideration to the implications of these significant employment opportunities within the Lancashire and Central Lancashire areas, which have potential to create greater demand for homes in the area.

18. The current standard method identifies a local housing need for Chorley of 564dpa, for Preston of 590dpa and for South Ribble of 489dpa, giving an overall total of 1,643dpa. The HBF notes that this should be minimum requirement and that this should be the starting point for the Councils to determine their housing requirements. The proposed overall housing requirement is just equivalent to 80% of the current standard method. As set out previously, the transitional arrangements set out in the NPPF⁸ states that for the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025 and its draft housing requirement meets at least 80% of local housing need.

19. Paragraph 4.19 of the Plan, states that following the publication of the revised NPPF in December 2024 the annual housing requirement for Central Lancashire has been increased slightly to 1,314dpa in order to achieve 80% of the LHN using the new standard method formula, in accordance with the transitional arrangements. It suggests that the additional 77 dwellings needed to meet this 80% requirement has been distributed between the three authorities. The HBF is concerned at the arbitrary nature of adding the 77dpa to the housing requirement solely to meet the transitional requirements in relation to meeting 80% of the identified local housing need. This new housing requirement does not appear to be evidenced at all, other than to meet the transitional arrangements. The HBF does not consider that this was the intention of the transitional arrangements. It is not clear why the Councils could not seek to meet the entire local housing need or even a greater proportion of the need, why the limitation to meeting only 80% of the need. There is evidence to support the local housing need identified by the current standard method. There is also evidence for the previous standard method and the economic scenario considered in the Central Lancashire Housing Study Update however, these figures would not meet the transitional arrangements. As such the HBF considers that the transitional arrangements are not being appropriately used in this case, and should not be used as a way to lower the housing requirement in Central Lancashire.

20. The HBF notes that the PPG⁹ states that *'where strategic policies are being produced jointly . . . the housing need for the defined area should at least be the sum of the local housing need for each local planning authority within the area. It will be for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at cross the plan area'*. The HBF is however, concerned that the housing requirement for Chorley is so much significantly lower than identified local housing need. The HBF also notes that paragraph 4.20 states that the housing requirement in Chorley is to be stepped over the Plan period to take account of low delivery rates in the earlier years of the Plan. The requirement has been stepped from 280 dwellings per annum

⁸ NPPF 2024 paragraph 234

⁹ PPG ID: 2a-013-20241212

(dpa) in the first 3 years of the Plan period (2023/24 to 2025/26) increasing to 345 dpa from 2026/27 onwards, thereby exacerbating the lack of housing being provided in Chorley.

21. The HBF is keen that the Councils produce a plan which can deliver against their housing requirements. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.

22. It is important that housing delivery is effectively monitored so that if housing monitoring shows delays to housing delivery across Central Lancashire action is taken to address this as soon as possible. The HBF suggests additional sites should be allocated so they that can be easily and quickly brought forward to address any under-delivery of housing supply. The Council will need to monitor the delivery of housing and publish progress against a published Housing Trajectory Housing monitoring should be undertaken on a site-by-site basis.

Policy HS2: Housing Allocations Chorley, Policy HS3: Housing Allocations South Ribble and Policy HS4: Housing Allocations Preston

Policy HS2 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

23. The HBF considers that the Council will need to consider an appropriate balance of development, to ensure that all of their housing needs are met in terms of types and tenures; locations and markets, and to ensure that the Plan can deliver against its housing requirements. Although HBF does not comment on individual sites or allocations, we believe that the Plan should provide for a wide range of deliverable and developable sites across the Borough in order to provide competition and choice to ensure that housing needs are met in full.

24. The HBF also notes that the NPPF¹⁰ requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. The HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. The HBF would therefore wish to see the 10% small sites allowance delivered through allocations (and not windfall). Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the

¹⁰ NPPF December 2023 Paragraph 70 / NPPF 2024 Paragraph 73

1980s, small developers accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%. The HBF also notes that support for small and medium builders need not be limited to only small sites of less than 1Ha. SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of additional non-strategic allocations would expand the range of choice in the market, and (possibly most importantly), be of a scale that can come forward and make a contribution to housing numbers earlier in the plan period.

25. The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Central Lancashire's housing requirement. This sufficiency of housing land supply should ensure that the Council can meet the housing requirement, ensure the maintenance of a 5-year housing land supply and achieve the Housing Delivery Test. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and to provide flexibility and choice within the market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared.

26. The HBF believes that the Plan should provide for a wide range of deliverable and developable sites, including a buffer and small site allocations in Central Lancashire in order to provide competition and choice to ensure that housing needs are met in full.

Policy HS6: Housing Mix and Density

Policy HS6 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

Housing Mix

27. This policy states that all market and affordable housing developments of 10 or more dwellings must: provide a mix of dwelling types and sizes to address the needs for that location as identified in the Housing Need and Demand Assessment; build all dwellings to M4(2) standards; and 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.

28. The HBF understands 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. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements, requiring a mix that does not consider the scale of the site, does not consider the viability of the site, or requires the applicant to provide significant amounts of additional evidence. The HBF would expect the Council to ensure that the policy is applied flexibly and makes allowance for home builders to provide alternative housing mixes as is required by the market.

29. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. The PPG¹¹ 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. It is incumbent on the Councils to provide a local assessment evidencing the specific case for Central Lancashire which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Councils can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.

30. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, and the ability to provide step-free access. If the policy is to be retained, it will need to be amended to include these considerations.

31. The Council should also note that the Government response to the Raising accessibility standards for new homes¹² states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.

32. The HBF notes that Part 1(c) 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. Whilst 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. The HBF is concerned about the significant additional cost of providing Part M4(3) wheelchair accessible homes and recommends that the Council amend the policy to remove this requirement. 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.

¹¹ ID: 56-007-20150327

¹² <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

33. The Viability Report (Feb. 2025) identifies this has a cost implication for development. In addition to the baseline BCIS construction cost we have made extra allowance for these optional Building Regulations requirements to demonstrate that this is achievable: £1,109 (apartments) and £626 (houses) per unit for accessible and adaptable housing M4(2) Category 2 and £9,492 (apartments) and £27,241 (houses) per unit for wheelchair accessible dwellings M4(3) Category 3. This is based on the Equality and Human Rights Commission & Habinteg, 'A toolkit for local authorities in England: Planning for Accessible Homes (index linked to BCIS TPI).

34. The HBF also notes the significant viability challenges that are identified within section 6 of the Viability Report (Feb 2025). 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 against a set of fully policy compliant appraisals, realistic land values and a 20% profit.

Housing Density

35. A table of minimum gross densities is provided within the policy, this identifies a minimum gross density of 86 dwellings per hectare (dph) in Preston City Centre; 40dph in Town, District and Local Shopping Centres; 27dph in other locations within settlement boundaries; and 21dph outside settlement boundaries.

36. The HBF supports the efficient use of land and understands the inclusion of a density policy. The HBF considers that the inclusion of a level of flexibility to take account of site-specific circumstances is appropriate.

37. The HBF considers that it is important to ensure that the density requirements do not compromise the delivery of homes in sustainable locations to meet local needs. The Council will need to ensure that consideration is given to the full range of policy requirements as well as the density of development, this will include the provision of M4(2) and M4(3) standards, the NDSS, the provision of cycle and bin storage, the mix of homes provided, the availability of EV Charging and parking, any implications of design coding and the provision of trees and canopy proportions, highways requirements, Biodiversity Net Gain, and Building Regulations requirements in relation to heating and energy and the Future Homes Standard.

Policy HS7: Affordable Housing

Policy HS7 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

38. This policy states that all residential developments of 10 or more dwellings must deliver affordable housing within a minimum of 30% in Preston; the Key Service Centres; and the Urban Local Service Centre, and a minimum of 35% on sites in all other locations. The policy also provides a tenure split for the affordable homes, which differs slightly from 71% social rent and 21% affordable home ownership in Chorley; to 52% social rent, 24% affordable rent and 24% affordable home

ownership in Preston; to 45% social rent, 32% affordable rent and 23% affordable home ownership in South Ribble.

39. The Plan highlights that a Housing Needs and Demand Assessment (HNDA) was prepared for each of the Central Lancashire Authorities in 2024. The Chorley HDNA identifies an annual need for 162 affordable homes, and recommends a tenure split of 71% rented and 29% affordable home ownership. The Preston HDNA identifies an annual need for 130 affordable homes, and recommends a tenure split of 76% rented and 24% affordable ownership. The South Ribble HDNA identifies an annual need for 146 affordable homes, and recommends a tenure split of 77% rented and 23% affordable home ownership.

40. The HBF supports the need to address the affordable housing requirements of the borough. The NPPF¹³ is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.

41. The HBF also notes the significant viability challenges that are identified within section 6 of the Viability Report (Feb 2025). 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 against a set of fully policy compliant appraisals, realistic land values and a 20% profit. 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'*.

42. The HBF is concerned that the Plan as proposed will not meet the affordable housing need, as set out in the HDNA. The HBF considers that the Council should consider increasing the housing requirement to help to address this need as set out in the PPG (ID: 2a-024-20190220). The HBF also recommends that the Council looks again at their Plan and 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.

Policy EC5: Mixed Use Allocations Chorley, Policy EC6: Mixed Use Allocations South Ribble
Policy EC5 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

43. The HBF considers that the Council will need to consider an appropriate balance of development, to ensure that all of their housing needs are met in terms of types and tenures; locations and markets, and to ensure that the Plan can deliver against its housing requirements. Although HBF

¹³ NPPF December 2023 Paragraph 34

does not comment on individual sites or allocations, we believe that the Plan should provide for a wide range of deliverable and developable sites across the Borough in order to provide competition and choice to ensure that housing needs are met in full. The Council may also want to consider if these mixed use sites are appropriate for a variety of housing and accommodation purposes including housing for older people and specialist housing.

Policy EN1 (Strategic Policy): Well Designed Places

Policy EN1 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

44. This policy states that major development proposals which include residential uses should show how they will meet the criteria in Building for a Healthy Life and will be expected to achieve a green light against each question. It goes on to state that all new dwellings must comply with the nationally described space standards and higher water efficiency standards (equivalent to 100 litre / person/ day). It also states that all development should be consistent with national and any adopted local design codes, and guidance such as the Central Lancashire Design Guidance.

45. The HBF is concerned that the Council is expecting major developments to achieve a green light against each of the Building for a Healthy Life considerations. The HBF notes that the Building for a Healthy Life document itself highlights that there may be circumstances where amber lights cannot be avoided, and that a development only needs nine green lights in order to achieve a commendation and to use the Building for a Healthy Life logo. The HBF therefore recommends that this policy is amended to remove this requirement for all green lights and to better reflect this guidance.

46. The nationally described space standards (NDSS) as introduced by Government, are intended to be optional and can only be introduced where there is a clear need, and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. PPG¹⁴ identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: Need, Viability and Timing. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

47. The HBF does not consider that it is necessary for development to adopt, as a minimum, measures to limit water usage including the implementation of the optional technical standards for water efficiency. The optional water standard is 110 litres per person per day, the Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure.

¹⁴ PPG ID: 56-020-20150327

48. A policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. PPG¹⁵ states that where there is a ‘*clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day*’. PPG¹⁶ also states the ‘*it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement*’. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The North West and Central Lancashire are not considered to be an area of Water Stress as identified by the Environment Agency¹⁷. Therefore, the HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.

49. The HBF does not consider it appropriate to require a development to be consistent with any adopted local design codes, and guidance, such as the Central Lancashire Design Guidance, as any requirements within these documents will not have been tested and examined in the same way as the Local Plan and should not therefore be elevated to having the same weight as the development plan.

Policy EN2: Design Criteria for New Development

Policy EN2 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

50. This policy states that all major development amending existing or proposing new streets and open spaces should be climate change resilient, be designed in line with Manual for Streets and include street trees amongst other criteria.

51. The HBF notes that the policy suggests that proposals should be designed in line with Manual for Streets giving priority to people over vehicles, however, the HBF wonders how comfortably that fits with the NPPF¹⁸ which states that transport issues should be considered from the earliest stages of plan-making and development proposals using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. Whilst a vision-led approach may incorporate elements from Manual for Street it will also likely include wider design considerations, in order to create a more comprehensive plan for the area without the focus being on streets and transportation.

¹⁵ PPG ID: 56-014-20150327

¹⁶ PPG ID: 56-015-20150327

¹⁷ 2021 Assessment of Water Stress Areas Update: <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>

¹⁸ NPPF 2024 paragraph 109

52. The HBF is concerned by the need to include street trees, whilst sometimes this may be appropriate, it may not always be the case, this could have significant potential implications in terms of viability of the development, not only due to the tree provision costs but also in terms of efficient land use, site layout and highways considerations. The HBF considers that it will be important for the Council to gather appropriate evidence in relation to this policy that considers its practical implementation, and how it sits alongside other plan requirements.

Policy EN6: Biodiversity Net Gain

Policy EN6 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

53. This policy states that developments must deliver the mandatory Biodiversity Net Gain (BNG) requirement of at least 10% unless exempt, quantified using the latest version of the statutory biodiversity metric. It states that development should demonstrate how the BNG hierarchy has been followed, it then sets out another sequential order for the delivery of BNG which starts with on-site, followed by off-site within the LPA boundary, off-site within Central Lancashire, off-site within the National Character Area (NCA), off-site nationally, and then finally the purchase of statutory biodiversity credits. It also suggests that applicants are to provide justifications for where any deviation from the hierarchy occurs. It goes on to state that all applications subject to BNG should provide a draft BNG Plan demonstrating how the BNG will be achieved.

54. The HBF notes the introduction of Biodiversity Net Gain (BNG) which came in for large sites on February 12th, 2024, and for small sites from 2nd April 2024. It is therefore important for this policy to fully reflect all the new legislation, national policy and MHCLG and DEFRA guidance.

55. The HBF has been involved in a significant amount of work, being led by the Future Homes Hub, on BNG preparedness for some time, including feeding into the BNG Planning Practice Guidance and the DEFRA BNG Guidance. The HBF notes that this represents a lot of new information that the Council will need to work through and consider the implications of, in order to ensure that any policy on Biodiversity Net Gain policy complies with the latest policy and guidance now it has been published. It should also be noted that the PPG¹⁹ is clear that there is no need for individual Local Plans to repeat national BNG guidance.

56. It is the HBF's opinion that the Council should not deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act. The Plan should provide certainty for developers and a clear BNG policy with a fixed 10% figure.

57. It is also important to note that for large and complex sites where the development is phased, the guidance is clear that the 10% must be delivered at the end of the development, and this may

¹⁹ ID: 74-006-20240214

not result in 10% BNG on each phase. Additional advice on phased development has been provided in the BNG PPG²⁰.

58. The Viability Assessment includes a cost assumption in relation to BNG of £1,137 per unit for greenfield site and £242 per unit for brownfield sites. This is based upon the: Net biodiversity gain costs based on the DEFRA Impact Assessment Biodiversity net gain and local nature recovery strategies IA. The HBF notes the viability challenges set out within the Viability Assessment. The HBF considers that there are significant additional costs associated with biodiversity net gain, which should be fully accounted for in the Council's viability assessment, some of which remain unknown at this time. It is important that BNG does not prevent, delay or reduce housing delivery. The costs relate both the financial costs and also land take- which will impact on densities achievable if BNG is provided on site.

59. As this is still a new policy area and the market for off-site provision is not yet known, any figure used for BNG costs will need to be kept under review as BNG implementation progresses and a greater understanding of actual costs become available. The Viability Report must clearly set out how it considered the implications of mandatory BNG and how it was arrived at using the most up to date BNG costs information available.

60. The HBF notes that the policy suggests that in each stage of hierarchy the delivery of BNG should be targeted on land identified in the Local Nature Recovery Strategy (LNRS), the HBF considers it is appropriate for the policy to consider the relationship between the plan and the LNRS. However, the LNRS should not be used to restrict development or to limit the requirements of the BNG and metric being met. As the LNRS emerges it will be important for this Local Plan to be kept under review and further public consultation on the interaction between the two documents and/or changes to Local Plan policy and/or its implementation, to reflect the LNRS may be needed. The Government recently²¹ published additional Guidance²² on how Local Nature Recovery Strategies should be integrated with/feed into Local Plan Making. We would encourage the Council to review the new guidance and fully consider its implications for this Plan.

61. The HBF also notes that there seems to be significant potential for confusion around environmental hierarchy, and suggest particular care is needed to avoid any confusion between the well-established mitigation hierarchy, the BNG hierarchy and the sequential order set out in this policy. There is need for the policy wording and/or supporting text to be clearer about the differentiation between the mitigation hierarchy (which seeks to avoid harm in the first place, then mitigate and only then compensate it in relation to protected habitats) and the BNG delivery hierarchy (which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits) and this sequential order for Central Lancashire which provides a more local context. There seems to be significant potential for confusion between the different hierarchies. The HBF therefore suggests

²⁰ ID: 74-054-20240214 & ID: 74-056-20240214

²¹ 19/02/2025

²² See <https://www.gov.uk/guidance/plan-making> and <https://www.gov.uk/guidance/natural-environment#local-nature-recovery-strategies>

that the Council should take particular care to explain how the requirements of the two-part BNG hierarchy work in different ways and that they seek to achieve different aims.

62. The HBF recommends that that Council work closely with the HBF, PAS, DEFRA and others with expertise in BNG to ensure that the policy is amended appropriately to reflect the latest position.

Policy EN8: Trees, Woodlands and Hedgerows

Policy EN8 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

63. This policy states that where it has been demonstrated by the applicant that there will be an unavoidable loss of trees and / or hedgerow in order to facilitate the proposal, then appropriate mitigation via compensatory planting will be required. Tree planting shall be provided on-site at a ratio of 2 trees per 1 loss and loss of hedgerow shall be compensated for by planting of an equal or greater length of hedgerow to the length lost.

64. The HBF is concerned by the potential tree ratio and hedgerow replacement strategy provided, this could have significant potential implications in terms of viability of the development, not only due to the tree and hedge provision costs but also in terms of efficient land use, site layout and highways considerations. The HBF considers that it will be important for the Council to gather appropriate evidence in relation to this policy that considers its practical implementation, and how it sits alongside other plan requirements.

Policy EN15: Areas of Green Belt

Policy CC1 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

65. This policy starts by stating that the NPPF (Dec 2023) para 154 specifies a closed list of development typologies not inappropriate within the Green Belt. The policy then goes on to set local criteria in relation to how the Council will consider these development typologies. Whilst the HBF understands that the transitional arrangements may apply to this Local Plan, it does not make sense to the HBF to include a policy, that will be out of date as soon as it is adopted. This policy will clearly be superseded by the 2024 NPPF policies in relation to inappropriate development in the Green Belt. The HBF strongly recommends that this policy is deleted.

Policy CC1 (Strategic Policy): Climate Change

Policy CC1 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

66. This policy states that development proposals should maximise opportunities to contribute to the delivery of net zero greenhouse gas emissions and be designed, constructed and operated to

address the mitigation of climate change; and address and reduce climate related risks through adaptation measures where appropriate. It goes on to state that applications for major development proposals should include an Energy Statement to demonstrate how the net zero greenhouse gas emissions targets will be met, and carbon emissions should be calculated through a nationally recognised Whole Life Cycle Carbon (WLC) Assessment demonstrating actions taken to reduce life-cycle carbon emissions.

67. The HBF supports the Council in seeking to reduce the amount of energy used and to improve energy efficiency. However, the HBF considers that the Council should ensure that this policy is only implemented in line with the December 2023 Written Ministerial Statement²³ which states that 'a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'. It goes on to state that 'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations. The proliferation of multiple local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current, or planned building regulations, should be rejected at examination if they do not have a well-reasoned and robustly costed rationale'. The HBF considers as such it is appropriate to make reference to the Future Homes Standard and the Building Regulations as the appropriate standards for development, and to seek to use these standards to reduce energy use and improve energy efficiency.

68. The HBF considers that this policy does not serve a clear purpose, and it is not evident how a decision maker should react to development proposals. Whilst it requires the calculation of the whole life cycle carbon emissions and actions to reduce life cycle carbon emissions it is not clear from the policy how it will be determined what is an appropriate level of emissions or what would be an appropriate level of reductions.

69. The HBF is also concerned that planning may be too early in the building process to fully assess the carbon impact of a design. It may be that further decisions are made post planning, which do not require further consent which would impact on the carbon emissions.

70. The HBF considers that if the Council is to introduce a policy in relation to WLC it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry, including material extraction and transportation, occupation and maintenance, demolition and disposal. The Council will also have to consider how the policy will

²³ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

interact with other policies, for example in relation to energy efficiency or resilience to heat, as well as the viability and delivery of development.

71. The HBF considers that if this policy were to be introduced then the Council should provide a transitional period to give the industry time to adjust to the requirements, to upskill the workforce as needed and for the supply chain to be updated or amended as required.

72. The HBF also notes that the Viability Assessment does not appear to have included a cost for undertaking this whole life-cycle carbon assessment, or any costs associated with addressing any issues raised by these assessments.

Policy CC3: Reducing Energy Consumption

Policy CC3 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

73. This policy states that major development proposals should produce an Energy Statement to show how they will minimise whole life-cycle emissions and maximise on site carbon reductions. It goes on to state that new buildings and development proposals should minimise the consumption of energy water and other resources and maximise energy and water efficiency.

74. The HBF does not consider that it should be necessary for all major developments to produce an Energy Statement to show how they will minimise whole life cycle emissions and maximise on site carbon reductions, and where this is necessary a proportional approach should be taken to the amount of information required. The HBF continues to have concerns in relation to the need to undertake an assessment of whole life carbon emissions, as set out previously. And as above the HBF the HBF would encourage the Councils to work within the nationally set standards rather than introducing alternative requirements.

75. The HBF would question the value of parts 3 and 4 of this policy which are both covered in other parts of the Plan, as is highlighted in the policy itself. It should not be necessary for requirements to be duplicated, as the Plan should be read as a whole.

76. The HBF also notes that the Viability Assessment does not appear to have included a cost for undertaking this whole life-cycle carbon assessment, Producing an Energy Statement, or any costs associated with addressing any issues raised by these assessments.

77. The HBF recommends that this policy is deleted.

Policy ID3: Digital and Communications Infrastructure

Policy ID3 is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:

78. This policy states that proposals for residential major development should demonstrate within a Broadband Statement how they will provide future occupiers with potential for full fibre broadband connectivity, including details of engagement with broadband providers and details of how the broadband will be delivered.

79. The HBF generally consider that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital infrastructure such as high-speed broadband and fibre is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers. Service providers are the only ones who can confirm access to infrastructure. Whilst the NPPF²⁴ establishes that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand. The HBF considers that in seeking to provide broadband and fibre to homes the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure.

80. As the Council are no doubt aware part R of the Building Regulations: Physical Infrastructure and network connections to new dwellings require all new build dwellings to be installed with the gigabit-ready physical infrastructure connections subject to a cost cap of £2,000 per dwelling. These requirements mean that there is no need for the inclusion of part 2 of this policy. Therefore, the HBF recommends that Part 2 of the policy is deleted from the local plan.

Appendix 2: Monitoring Framework

81. The Monitoring Framework provides a selection of Indicators, with their Source and a monitoring Target to monitor the Plan. The HBF recommends that the Councils provide details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified by the Monitoring Framework.

Future Engagement

82. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

83. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

84. At present the HBF does not consider that the Plan is sound, as measured against the tests of soundness set out in the NPPF, and as set out in our representations above. The HBF would

²⁴ NPPF December 2023 paragraph 118 / NPPF 2024 paragraph 119

therefore like to participate in any hearing sessions associated with the examination of the Central Lancashire Local Plan and related to our representations, as this will allow the HBF to represent the industry and to address any relevant points raised at the examination. The HBF would like to be kept informed of the submission and examination of the Local Plan.

Yours sincerely,



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