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SENT BY EMAIL

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Dear Planning Policy Team,

LANCASTER LOCAL PLAN REVIEW – SCOPING AND EARLY PARTICIPATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Lancaster Local Plan Review - Scoping and Early Participation consultation.
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 multinational 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. It is noted that the Council approved its latest Local Development Scheme (LDS) in April 2025. This indicates the submission of the Local Plan Review for examination by November 2027 and the examination itself taking place in late 2027/early 2028. On 27 November 2025, Housing and Planning Minister Matthew Pennycook confirmed details of a new-plan making system in a Written Ministerial Statement (ref: UIN HCWS1104) with the relevant regulations to be published and brought into effect shortly.
4. In December 2025, the Government also published a consultation draft of a new National Planning Policy Framework (NPPF), which once published in its final form, is intended to replace the current NPPF which was published in December 2024. The consultation draft contains both policies for plan making as well as decision taking.
5. Taking into account the timescales in the LDS, it is clear that the Council will be preparing the Local Plan Review under the new plan-making system and that this will be prepared pursuant to the new NPPF (which is currently subject to consultation).
6. The HBF notes that at this early stage, the Council is seeking answers to the following questions:

- What matters or issues should the new Local Plan address?
 - Why are these issues important for the future of Lancaster District?
7. Whilst we answer these questions below, it should be acknowledged that the plan-making system is in a state of flux (for the reasons outlined above). Given that currently only limited weight can be given to the consultation draft of the emerging new NPPF, we refer to both the current NPPF and the emerging NPPF in our comments below.

What matters or issues should the new Local Plan address?

8. As set out in paragraph 16 of the current NPPF, the Local Plan Review should *inter alia*:
- Be prepared with the objective of contributing to the achievement of sustainable development.
 - Be prepared positively, in a way that is aspirational but deliverable.
9. This is echoed in Policies PM2, PM14 and S1 of the emerging NPPF.
10. In order to ensure that the Local Plan Review contributes to sustainable development, the HBF considers that it is fundamental that it should plan to meet both market and affordable housing needs in full and that this should be front and centre of the Vision and Objectives of the Plan. This is made clear in paragraph 61 of the current NPPF, with paragraph 62 then outlining that this should be informed by the area's Local Housing Need (LHN) derived from the Standard Method. This is also replicated in the emerging NPPF in Policies PM2 and HO1.
11. In the case of Lancaster, this currently equates to a minimum figure of 627 dwellings per annum (based on the most recent housing stock and affordability data).
12. The HBF also requests that the Council fully examines whether there is a need for an uplift to the LHN because of requirements to provide a range and choice of sites, the need for flexibility, viability considerations, alignment of jobs and new homes, unmet need from neighbouring areas, and whether higher levels of open-market housing are required to secure an increase in the delivery of affordable housing. The HBF expects all these aspects to be explored thoroughly through the Council's evidence base.
13. Alongside this, the HBF considers that the Council will need to provide a robust and realistic housing trajectory which demonstrates a sufficient supply of new homes over the plan period, and for the Council to demonstrate that it can achieve and maintain a five year supply of deliverable housing land across the lifetime of the Local Plan (in line with paragraph 78 of the current NPPF and Policy HO3 of the emerging NPPF).

14. When seeking to apply housing needs spatially, the HBF expects the Local Plan to be based on a logical settlement hierarchy that can meet the needs of the whole of Lancaster and all areas of the housing market. This should include an appropriate mix of both larger strategic allocations and smaller non-strategic allocations and consider both greenfield and brownfield sites. In particular, the plan should, through its evidence base, seek to identify and allocate 10% of its housing requirement on sites no larger than one hectare (in line with paragraph 73 of the NPPF). This requirement is carried over in the emerging NPPF (Policy HO6) where it also requires a further 10% of the Local Plan requirement to be met on sites of between one and two and a half hectares.

15. Where specific planning policy requirements are identified in the Local Plan, these need to be supported by robust and authoritative data and applied as flexibly and pragmatically as possible, so as to not frustrate the delivery of the homes that Lancaster needs. It is important that such requirements are thoroughly examined through a whole-plan viability assessment to clearly demonstrate that developments can accommodate these planning policy requirements in a viable manner.

16. The HBF also considers that any planning policy requirements included in the Local Plan should align with standards set by the Government and not seek to deviate from these. This ensures a degree of consistency which will assist in the delivery of new homes. It is noted that the emerging NPPF makes this explicit in Policy PM13.

17. The HBF notes that if brought forward in its current form, the emerging NPPF contains national policies for decision-making which should be used when preparing the Local Plan Review (see paragraph 2 of Annex A).

Why are these issues important for the future of Lancaster District?

18. The Government is committed to delivering 1.5 million new homes across the country over this parliament. This is in acknowledgment of the acute housing need across England as a whole. It is important that as part of this, Lancaster plays its role and contributes towards the Government’s target in a fair and equitable way. This means meeting its LHN as a minimum.

19. The HBF notes that the Council’s latest assessment of its housing supply (from September 2025) shows that it does not have a five year supply of deliverable housing land (this is stated as 2.8 years for the period 25/26 – 29/30). Similarly, when examining the Council’s Housing Land Monitoring Report (June 2025), the following gross completions have been achieved over the last five years (which include student and other residential institutions):

Year	Relevant Housing Requirement	Net Completions	Difference
2020/21	485	430	-55
2021/22	485	441	-44

2022/23	485	202	-283
2023/24	485	214	-271
2024/25	685	196	-489

20. This clearly demonstrates that Lancaster is not only failing to meet its current housing need, but that it has done so for a sustained period of time.
21. The primary consequence of this is to drive up house prices locally, leading to an unbalanced housing market and further increasing housing need. This can then hamper the ability of local people to find homes which are sufficiently affordable and eventually may price them out of the area (this in particular affects younger generations and young families). The wider effect of this is then to undermine the sustainability of Lancaster as an authority, given that more people are then likely to have to commute into the authority to work rather than be given the opportunity to live closer to their place of work.
22. Therefore, the future success of Lancaster District is fundamentally tied to it being able to meet its housing needs, so that it is able to grow sustainably, keep its settlements viable and vibrant and reverse years of under provision of new homes.

Future Engagement

23. We trust that the Council will find these comments useful as it progresses the Local Plan Review. We would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
24. The HBF would like to be kept informed of all forthcoming consultations on the Local Plan Review and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

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