

Matter 5 Housing Requirement and Housing Policies SP10, SP11 and SP12

Issue 5.1: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in meeting the housing needs of all groups in Hyndburn over the plan period?

Issue 1 Housing requirement

1. The housing requirement set out in the Plan is an average of 194 dwellings per annum, much higher than the figure calculated using the standard method. Is this positively prepared, justified by proportionate up to date evidence and consistent with national planning policy?

- 1.1. This policy states that over the plan period 2021-2040 the Council will make provision for at least 3,686 dwellings (equivalent to an average of 194dpa). As previously set out, the HBF generally supports the Council in setting a housing requirement over the local housing need identified by the standard method, and in seeking to meet the economic led housing need.
- 1.2. The HBF generally supports the Council in using a housing figure above the local housing need (LHN) identified by the standard method that was in place at the time that this Plan was submitted. The Housing and Economic Needs Update (September 2021) identifies a need for 194 dwellings per annum (dpa) for Hyndburn based on the economic need, using a job-led scenario and commuting ratios based on the Census.
- 1.3. However, the HBF notes that the Growth Option and Spatial Option Justification Paper highlights that the medium housing growth option (246 dwellings per annum), was the preferred option based on the consultation responses. Table 4 of the same document suggests that based on the SA Findings, the Policy Ambitions, the Evidence Base, the Consultation responses, and flexibility and deliverability that Option 3 is the most positive option. The HBF also notes that the current standard method would see Hyndburn seeking to achieve a higher housing figure of 303 dwellings per annum).
- 1.4. The HBF considers that the Council needs to be aware that the local housing need as identified by the standard method is increasing, and this may have implications for a review of the Plan and for the supply and delivery of housing going forward. For example, from 1st July 2026, for the purpose of decision making only, the Council will be expected to include a 20% buffer. The paragraph 234 of the 2024 NPPF is also clear that for the purpose of preparing local plans, the policies in this version will apply from 12 March 2025 other than where one or more of the following apply: . . . (b) the plan has been submitted for examination under Regulation 22 on or before the 12 March 2025. It goes on to state that where paragraph 234(b) applies if the housing requirement in the Plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new Plan under the revised plan-making system, as soon as the relevant provisions are brought in to force, in order to address the shortfall in housing need.

2. What are the exceptional local circumstances that justify deviating from the standard method?

- 2.1. The PPG¹ in place at the time of Submission sets out when it might be appropriate to plan for a higher housing need figure than the standard method indicates. It states that the Government is committed to ensuring that more homes are built and support ambitious authorities who want to plan for growth. It goes on to state that the standard method provides a minimum starting point in determining the number of homes needed in an area, it suggests that there will be circumstances where it is appropriate to consider whether actual housing needs is higher than the standard method indicates. It suggests that these circumstances can include, but are not limited to, growth strategies for the area; strategic infrastructure improvements, an authority agreeing to take unmet need, previous levels of housing delivery or previous assessments of need.
- 2.2. The NPPF² states that to determine the minimum number of homes needed, strategic policies should be informed by local housing needs assessment, conducted using the standard method . . . unless exceptional circumstances justify an alternative approach. It also sets out that planning policies should . . . seek to address potential barriers to investment, such as . . .housing.
- 2.3. The Local Housing and Economic Needs Assessment sets out that growth strategies within the study area including the Pennine-Lancashire Housing Zone and the Pennine Lancashire Growth and Prosperity Plan both of which would justify the Council exceeding the standard method housing need figure.

3. Is the proposed level of housing supported by the planned economic growth ?

- 3.1. The Council are proposing to use an economic led housing need figure, which is greater than the level of need from the standard method that was in place at the time of submission.

Policy SP11 Suitable Range of Housing**4. Is the Policy justified, effective and consistent with national planning policy and the PPG in requiring accessible, adaptable and wheelchair friendly homes?**

- 4.1. The HBF does not consider that this policy is justified, effective or consistent with national planning policy.
- 4.2. Part 1 & 1(b) of the policy currently states that '*new housing development should aim to provide an appropriate mix of dwellings based on the following . . . provision of housing for older people, people with disabilities and wheelchair users*'. It is not clear if part 1(b) of this policy is an aim, as set out in the final sentence of part 1 or a requirement. It is recommended that the Council consider the format of the policy and seek to improve the clarity.

¹ PPG ID: 2a-010-20201216

² NPPF Sept 2023 paragraphs 61 and 82

- 4.3. 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. PPG³ identifies the type of evidence required to introduce such a policy, 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 Council to provide a local assessment evidencing the specific case for Hyndburn which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. The HENA 2018 does provide some limited evidence in relation to the likely future need for housing for older people and disabled people it provides limited information in relation to the size, location, type or quality of dwellings needs and no evidence in relation to the accessibility and adaptability of the existing housing, and is now more than five years out of date. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy.
- 4.4. It should also be noted that the PPG⁴ 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 that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.
- 5. *The Local Plan Economic Viability Assessment identified that affordable housing was not viable on sites delivering older persons housing. Is it therefore justified that such sites should be make a contribution towards the affordable housing requirement?***
- 5.1. The HBF considers that it would not be appropriate for the Council to include a policy requiring the provision of affordable housing from older persons housing where they know that this would not be viable.

³ PPG ID: 56-007-20150327

⁴ PPG ID: 56-008-20160519

