

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 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?	<p>Yes, the housing requirement is positively prepared, justified by proportionate up to date evidence and consistent with national planning policy. Full justification for this can be found in the Background Paper Housing Land Requirement and Supply Position (HBC8.001) which is supported by findings in the HENA and its update (HBC2.003a and b). Further details are also set out in Question 2 below.</p> <p>This approach is consistent with the NPPF September 2023 as set out in the transitional arrangements for plan making in Appendix 1 of the December 2024 NPPF.</p>
	2. What are the exceptional local circumstances that justify deviating from the standard method?	<p>Please see the evidence documents highlighted in question 1 for detailed rationale.</p> <p>The Government expect the Council to use the Standard Methodology for calculating housing need as a starting point for identifying their housing requirement. In Hyndburn’s case, the latest figure generated by this was much lower than considered appropriate in relation to supporting the Government’s agenda of boosting the housing supply and sustaining economic growth. It is recognised that the standard method only produces a minimum housing need and it is possible to identify a higher figure, based on local circumstances.</p> <p>The HENA was updated in 2021 and identified a requirement of up to 194 dwellings to be delivered per annum over the sixteen-year period 2021-2037, giving a total requirement of 3,104 dwellings, which was adjusted to 3,686 dwellings when the plan period was amended to 2040.</p> <p>This approach will ensure that Hyndburn is able to provide a supply of good quality homes providing a range of choices in relation to size, tenure and location. This will help to ensure that the Borough reverses the previous damaging trends of population decline,</p>

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

		economic stagnation and poor housing choice. This is completely aligned with the Government’s key policy driver of significantly boosting the housing supply.
	3. Is the proposed level of housing supported by the planned economic growth?	Yes, The update to the HENA estimates that there would be an increase in around 2,019 jobs over the period 2021-37. This is then converted to the number of new dwellings to support this level of economic growth. This concluded that, in order to support the economic growth scenario, there would need to be provision of an average of 194 homes per annum over the period. Please see further detail in the HENA and its update (HBC2.003a and b) and the Background Paper Housing Land Requirement and Supply Position (HBC8.001).
<p>Policy SP11 Suitable Range of Housing</p>	4. Is the Policy justified, effective and consistent with national planning policy and the PPG in requiring accessible, adaptable and wheelchair homes?	<p>Yes, the NPPF recognises that specific groups, including people with disabilities and older people may have a need for a full range of housing to support their requirements. The evidence for the Council’s approach in SP11 is set out in Chapter 10 of the 2018 HENA (HBC2.003a), which concludes:</p> <p>The data shows that in general, Hyndburn has a higher level of disability when compared with the national position, and that an ageing population means that the number of people with disabilities could be expected to increase in the future. Key findings include;</p> <ul style="list-style-type: none"> • over 30% increase in the population aged 65+ (accounting for over 100% of total population growth); • a total need for around 1,700 units of housing for older people (sheltered, enhanced sheltered and extra-care) concentrations of long-term health problems and disabilities in the social rented sector; and • a need for around 400 dwellings to be for wheelchair users (M4(3)) in the period to 2036. <p>This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings.</p>
	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?	<p>On reflection and on the evidence provided by the Viability Assessment (HBC2.006), HBC concede that, for this matter, it is not justified for sites delivering older persons housing to make a contribution towards the affordable housing requirement. The Council therefore propose that in order to make the local plan justified, effective and consistent with national policy the following amendments (as proposed by the Planning Bureau on behalf of McCarthy and Stone (EL2.004)) should be made to the local plan:</p> <p>Add new sentence to end of point 3 to policy SP10 to read:</p>

		<p>3. <i>Support proposals that ensure the efficient use of land. Based on the developable area, the Council will seek provision of at least 40 dwellings per hectare in town centres and other locations well served by public transport, or at least 30 dwellings per hectare elsewhere, unless specific circumstances exist to justify a lower density or use of an alternative density measurement. <u>Schemes delivering housing for older people are exempt from delivering affordable housing.</u></i></p> <p><i>Add new para after 6.10 to read</i></p> <p><i><u>6.11 Schemes delivering housing for older people are exempt from delivering affordable housing. This is based on the analysis within the Local Plan Economic Viability Assessment – January 2022 that confirms that older person’s housing is unlikely to be viable in the current market in Hyndburn’ and supports the delivery of the Lancashire Housing with Care and Support Strategy</u></i></p>
<p>Issue 5.2: Has the Plan been positively prepared and is it justified, effective consistent with national policy in meeting the needs of Gypsies and Travellers?</p>		
<p>Gypsy and Traveller Accommodation Assessment (GTAA)</p>	<p>6. Does the (GTAA) provide a robust up to date evidence base?</p>	<p>Core Document HBC5.002 GTAA (2019) provides a comprehensive and robust assessment of accommodation needs for Gypsy and Traveller communities, as well as Travelling Showpeople, in the Borough. The Gypsy and Traveller Accommodation Assessment (GTAA) remains a credible and reliable source of evidence for identifying the accommodation needs within the Local Plan.</p> <p>The assessment was carried out in full compliance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). It adhered to established methodologies that included primary survey work, stakeholder engagement, and site assessments to ensure a thorough understanding of the current and future accommodation needs. Importantly, the assessment also took into account the amended definitions introduced by the Smith case, ensuring it remains relevant and in line with the latest legal and policy developments.</p> <p>Although the GTAA is based on data from 2019, the projections made in the assessment are grounded in demographic trends, household formation rates, and movement patterns that are expected to remain largely consistent over the period considered. These trends do not indicate significant changes, which is why the data remains valid and applicable for future planning, covering a limited extended period for the purposes of the Local Plan.</p>

		<p>To further supplement the GTAA, HBC8.005 Background Paper Gypsy and Traveller Site Provision has been produced. This paper provides an up-to-date overview of the current supply of pitches and updates the position with respect to planning permissions granted since 2019. This ensures that the most recent information is considered when assessing the borough’s current and future needs.</p> <p>As outlined in the Background Paper, at the time of the GTAA’s production, the assumption was that the Local Plan would be adopted by 2021/22. Based on this, the GTAA identified sufficient land for Gypsy and Traveller and Travelling Showpeople accommodation for a period of fifteen years, from 2021/22 to 2035/36. However, due to delays in the adoption of the Local Plan, the current Plan period has been extended, and is now anticipated to run from 2021 to 2040. This extended period reflects the current timeline for adoption, projected for 2025.</p> <p>The GTAA identified a need for 60 cultural pitches and 49 PPTS (Planning Policy for Traveller Sites) pitches during the period from 2019/20 to 2035/36. The need for these pitches is expressed on an annualised basis: an average of 3.5 cultural pitches per year and 3 PPTS pitches per year (rounded up).</p> <p>Given the limited time remaining in the plan period, it is considered a pragmatic and proportionate approach to extrapolate these figures over the remaining four years of the Plan period (i.e., from 2035/36 to 2040). This extrapolation provides a reasonable and balanced estimate of need moving forward.</p> <p>The risk associated with this projection is minimal. The Council’s commitment to reviewing the Plan every five years, alongside annual monitoring of accommodation needs, further mitigates this risk. Regular reviews and updates will ensure that the accommodation needs are continually assessed and any significant changes can be addressed promptly, keeping the Local Plan responsive to evolving requirements.</p>
	<p>7. Is it clear from the Plan what the cultural need for Gypsy and Traveller sites is over the Plan period and how it will be met?</p>	<p>It is acknowledged that Policy SP12 and its supporting text do not specifically reference the cultural need for Gypsy and Traveller sites throughout the Plan period. It would be beneficial to address this within the Plan for clarity.</p>

		<p>As outlined in HBC8.005 Background Paper Gypsy and Traveller Site Provision, the Council has already met the short-term cultural need for 21 pitches during the period 2019/20 to 2023/24. The GTAA identifies a further need for 39 pitches over the period 2023/24 to 2035/36.</p> <p>To cover the remainder of the Plan period (from 2035/36 to 2040), the Council has extrapolated these figures, estimating an additional need of 14 pitches, bringing the total cultural need to 53 pitches over the entire Plan period.</p> <p>The Council is committed to addressing the accommodation needs of the Gypsy and Traveller community within the Borough. The Plan identifies sufficient sites to meet this need. Specifically, four deliverable sites (GT1-GT4) are listed in Table 4 of the Plan, alongside a broad location for growth (GT5) earmarked for delivery in years 6-15 of the Plan, in line with paragraph 72 of the NPPF.</p> <p>Additionally, proposals for new Gypsy and Traveller sites will be considered in accordance with DM DPD Policy 15. There is potential for windfall sites to come forward, particularly in urban areas, to address small or short-term shortfalls. Evidence of this is provided by the number of pitches granted permission in the past 5 years, including those approved through the appeals process. The potential for windfall sites offers a buffer, ensuring flexibility and meeting any unforeseen supply gaps during the Plan period.</p>
	<p>8. Can an adequate supply of pitches be demonstrated over the first five years of the Plan and then over the remaining Plan period?</p>	<p>Please refer to the response to question 7 above. The Council believes that sufficient sites have been identified to meet accommodation needs throughout the Plan period.</p> <p>Site GT1 - Land at Springvale is an existing gypsy & traveller site established by an extant planning permission in 2006 (application reference: 11/05/0719) for the siting of 9no mobile homes. There has been some new activity at the site over the past 12-18 months which has resulted the creation of hardstanding across approximately half of the site earmarked for allocation and the stationing of caravans. There remains the requirement for the Council to investigate and establish whether the completed work requires the benefit of separate planning permission in order to authorise the development.</p>

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

		<p>Additionally, the Council is engaged in pre-application discussions regarding Site GT5 – Sough Lane, where unauthorised works to extend the existing Gypsy and Traveller site have already occurred.</p> <p>In light of this, it is considered likely that both Site GT1 and Site GT5 will come forward in the short term and will help meet accommodation needs within the first five years of the Plan.</p>
<p>Policy SP12 Gypsy and Traveller and Travelling Showpeople Provision</p>	<p>9. Is the Policy justified, effective and consistent with national planning policy?</p>	<p>The Council considers Policy SP12 to be both justified and effective. The policy is supported by the Gypsy and Traveller Accommodation Assessment (GTAA), which provides a comprehensive and robust evaluation of accommodation needs for Gypsy and Traveller communities as well as Travelling Showpeople in the Borough.</p> <p>The policy aligns with national planning policy, as outlined in the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS). It allocates a sufficient number of specific, deliverable sites to meet the short-term, evidenced need. As noted in the Council’s response to question 8 above, there is already active development at two of the four allocated sites, suggesting that these sites are likely to contribute to pitch provision within the first five years of the Plan.</p> <p>In addition, the Plan identifies specific developable sites and a broad location for growth in subsequent years. With the exception of GT4 – Land off Enfield Road, which is located directly adjacent to the urban boundary, both GT2 – Land off Crossland Street and GT3 – Land adjacent to Sankey House Farm are situated within the Borough’s urban areas.</p> <p>The Plan’s approach of identifying urban areas as suitable, sustainable locations for Gypsy and Traveller pitch provision, subject to a criteria-based policy, has proven successful in delivering windfall pitches in the past. The Council is confident that this approach will continue to be effective in delivering additional pitches across the Borough.</p> <p>The Council also recognises the importance of ensuring that sites with existing Gypsy and Traveller permissions, as well as those allocated through the Plan, are retained for that purpose. Any loss of these sites to other uses would necessitate the identification of</p>

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

		<p>alternative sites to continue meeting the overall need. To address this, Policy SP12 safeguards existing/authorised pitches within the Borough.</p> <p>It is also noted that no objections were raised at Regulation 19(1) or Regulation 19(2) stage in relation to Policy SP12.</p>
	10. Should reference to sites identified on the Policies Map be included in the Policy for effectiveness not footnote 82?	Yes, the Council agrees that this approach would provide greater clarity.
Sites GT1-5	11. Are the site allocations soundly based; and is there evidence that the development of the respective allocations is viable and deliverable when anticipated in the Plan period?	Please see the Council’s response to questions 8 and 9 above.
	12. Having regard to the individual site characteristics and any constraints, is there a need for the Plan to set out design, environmental or transport requirements to guide the development of sites GT1-5?	<p>The Gypsy and Travelling Show People Site Forms contained in HBC1.007a Regulation 22 (1c) Consultation Statement outline the representations received in relation to the proposed allocated sites, along with the relevant evidence supporting these allocations.</p> <p>Site GT1 – Land at Springvale received comments from the Environment Agency (EA) at the Regulation 19(2) stage, as part of the site lies within Flood Zone 3a (FZ3a). However, following the submission of revised EA Flood Risk Maps (see H004 Appendix 2 EA Flood Risk Maps) the EA has removed its objection. There are no other significant constraints at this site identified in the evidence base or through representations.</p> <p>Similarly, Sites GT2 to GT5 have no notable constraints identified either in the evidence base or in representations.</p> <p>Part 2 of the Policy requires proposals for new Gypsy and Traveller and Travelling Showpeople sites to be assessed in line with DM DPD Policy DM15. This policy adopts a criteria-based approach, stipulating that:</p> <p>“All development proposals for traveller sites... will be expected to:</p> <p>a. be located within a reasonable distance of services such as a school, bus stop, local shop, and health services;</p>

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

		<p>b. be situated in accessible locations with good public transport links; and</p> <p>c. cause no unacceptable harm to:</p> <ul style="list-style-type: none"> i. highway safety; ii. visual amenity; iii. residential amenity; iv. the biodiversity or geodiversity of the area; v. the character or appearance of a conservation area; or vi. heritage assets and their setting.” <p>Given the absence of significant constraints at Sites GT1-5, Policy DM15 of the DM DPD is deemed sufficient to guide development at these sites.</p>
	<p>13. In respect to GT4 and GT5 what exceptional circumstances are there to justify the release of land in the Green Belt? Have all other reasonable options for alternative sites been examined fully? What compensatory work is proposed and how would it improve environmental quality and accessibility?</p>	<p>The exceptional circumstances for releasing GT4 and GT5 are set out in the exceptional circumstances for Green Belt release (HBC8.004).</p> <p>The response to potential compensatory work is set out in the exceptional circumstances for Green Belt release (HBC8.004) paper and further information is provided in response to Matter 3 Question 9.</p>