

<p>Matter 10: Housing Land Supply</p>		
<p>Issue 10: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for the delivery of housing.</p>		
<p>Delivery</p>	<p>1. What evidence is there that the minimum housing requirement of 194 dwellings per annum will be achieved bearing in mind past delivery rates?</p>	<p>The minimum housing requirement ensures the local economy has the requisite work force to meet its prospective growth. This approach takes into consideration variations in economic activity rates, assumptions about persons working multiple jobs (double-jobbing), and commuting patterns as set out in the HENA. The standard method does not provide enough labour supply to achieve the planned economic growth, hence an approach that exceeds it is justified.</p> <p>Table 10.2 of the Housing and Economic Needs Assessment (HENA) Update 2021 (HBC2.003b) graphically shows the approach that was followed. Background Paper No. 1 (HBC8.001) also sets out the clear reasons why the Council is pursuing a growth strategy which identifies a housing requirement figure which is above the minimum generated by the Standard Method.</p> <p>Furthermore, the PPG (para 40) states “authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination.”</p> <p>The minimum housing requirement of 194 dwellings per annum is considered deliverable and realistic when assessed against both past performance and the identified supply of sites. Whilst the Standard Method calculation has in recent years produced a housing need figure of only 50 dwellings per annum in Hyndburn, delivery has consistently exceeded this level.</p> <p>Table 3.1 of HBC2.012 AMR 2023/24 confirms that in every year from 2019/20 to 2023/24 completions were substantially above 50 dwellings. In the three most recent monitoring years, completions have also exceeded the Local Plan minimum requirement of 194 dwellings, with 254 homes delivered in 2023/24. This track record provides strong evidence that the local housing market has the capacity to deliver above the identified requirement. Looking forward, delivery will be supported by a robust and varied housing land supply.</p>

		<p>Crucially, in each of the last three monitoring years completions have also exceeded the minimum housing requirement of 194 dwellings, with 254 homes delivered in 2023/24. This demonstrates that the local market is capable of sustaining delivery well above the minimum requirement.</p> <p>Both recent completions and the strength of the future housing land supply provide clear evidence that the minimum housing requirement of 194 dwellings per annum will be achieved over the plan period.</p>
	<p>2. The housing supply 2021-2040 is made up of a number of components as set out in Table 7 of HBC8.001.</p> <p>a) Is there compelling evidence that small sites (windfalls) will be a reliable source of supply amounting to 280 dwellings?</p> <p>b) What evidence is there to support the figure of 170 new dwellings (10 dwellings per annum), from housing in town centres/permitted development allowance?</p> <p>c) Is it appropriate for a lapse rate/non implementation rate to be applied to sites with planning permission?</p> <p>d) Is a buffer of 7% appropriate and justified to provide choice and competition in the market and make an allowance for the non-implementation of sites?</p>	<p>a) HBC provided a justification for this in the response to the Initial Questions (H002), question IQ14 (page 21).</p> <p>b) Yes. The Council has provided a summary of the evidence-based approach to the town centres/permitted development allowance in paragraphs 3.12 to 3.14 of the housing background paper. It explains that the allowance has been made for new housing in the town centres which covers a number of undeveloped sites in the AAAP and opportunities arising from the widening of PD rights. A further evidence document (EL3.010b) was submitted as part of the AAAP examination which shows the estimated housing delivery in the town centre as proposed by AAAP as being 282 dwellings (though some of these have since been developed).</p> <p>C and d) Neither the NPPF nor the NPPG require the application of a lapse rate to housing sites allocated in a development plan as a matter of course. Instead the desirability of applying a lapse rate and the size of that adjustment should be based on clear evidence. Accordingly, the Council has analysed lapse rates and the justification for a 7% housing supply buffer can be found in para 3.18 - 3.22 of the housing background paper, which allows for some flexibility in the choice and delivery of housing land.</p>
	<p>3. Policy SP10 recognises the important contribution of Huncoat Garden Village to housing supply. It contributes around 1500 homes out of a Plan requirement of 3,686 dwellings. Is there over reliance on the delivery of this site? If the development of the site is delayed and it cannot</p>	<p>Whilst a significant proportion of houses are planned at the strategic site HGV, the development opportunity will be realised over a number of years – with the masterplan assuming a plus 15-year development and investment programme. This is supported by a phasing strategy, incorporating appropriate infrastructure at each stage.</p> <p>The site is not reliant on one landowner, although all the landowners and developers are committed to delivering HGV in a cohesive way, in accordance with the Masterplan and the development has already been granted a</p>

	<p>provide the anticipated number of dwellings in the Plan period, are contingency measures required in the Plan?</p>	<p>significant amount of Homes England funding with built in timescales for delivery. Further details of this are provided in the HGV Stage 3 Masterplan (HBC5.003a), the response to Matter 9 (EL3.009) and the response to the Inspector’s Initial Questions (H002).</p> <p>Due to the multiple ownerships on the HGV site, there is potential for delivery of sites that are phased for later in the plan period to deliver earlier to ensure a contingency of housing supply at Huncoat Garden Village.</p> <p>There would also be the opportunity that other allocated housing sites would come forward earlier than scheduled to compensate for any delay in delivery at Huncoat. For example, H012 Housing Trajectory Information contains an update on delivery, with the representative of the site owner of Site H20: Land to the northeast of Cut Lane indicating that development could commence earlier than planned in years 0-5 rather than years 5-10 of the plan.</p> <p>Furthermore, the Council has recently received a planning application for large housing sites on land which has not been proposed through the Local Plan - Blackburn Road (11/24/0506) Major Full: Proposed erection of 85no. two-storey dwellings. This application shows that there is an appetite for development in Hyndburn and, should it be developed, these dwellings will be included in Hyndburn’s housing supply</p> <p>HBC are also committed to annual monitoring of housing delivery and where delivery is lower than expected the Council would look to prepare a Housing Delivery Action Plan and also commit to a 5 yearly review of the plan.</p>
	<p>4. What assumptions have been made to inform the trajectory for the delivery of housing sites, in terms of lead in times for grant of full planning permission, outline and reserved matters, and conditions discharge; site opening up and preparation; dwelling build out rates; phasing; and number of sales outlets?</p>	<p>The methodology to assess when sites will become available is set out in the SHLAA methodology. (HBC5.001a). Aside from HGV, the other of the site allocations are generally small to medium sites with the average capacity being 58 dwellings. It is not expected that these sites will be subject to any phasing and will be delivered in their entirety.</p> <p>The housing coming forward as part of HGV is being developed through a Masterplan and HBC is in regular contact with interested parties. The responses to the Inspector’s initial questions (H002, Q11a and 11b) and to Matter 9, give details regarding the deliverability of this site.</p>
<p>Affordable Housing</p>	<p>1. For clarity for decision-makers, developers and local communities should the need for affordable housing over the plan period be clearly set out in the Plan?</p>	<p>The need for affordable housing, as established in the HENA (para 13.14), is set out in the Local Plan in the supporting text for Policy SP10 at paragraph 6.8. HBC believe that this satisfactorily sets out the need for affordable housing.</p>

2. What are the past trends in affordable housing delivery in terms of completions and housing type and tenure? How is this likely to change in the future?

As shown in Table 1, over the period 2019/20 – 2023/24 998 dwellings have been delivered in Hyndburn. This gives an approximate total of 28% of additional dwellings in the Borough being affordable.

Table 1: Amount of affordable homes over the last 5 years

Period	Net additional new homes	Number of affordable dwellings	Percentage
2019/20	162	18	11
2020/21	180	47	26
2021/22	205	70	34
2022/23	197	94	48
2023/24	254	54	21
Total	998	283	28

The tenure of Hyndburn’s housing stock has stayed very consistent in recent years with the split being around 86.7% private sector and 13.3% private registered provider.

The HENA provides projections of Hyndburn’s population. It found that the population will stay fairly static between 2021 and 2037 with a change of just 0.11%, although there will be a 23% increase in the population aged 65+ and 61% for the 85+ age group. The area is also projected to see a notable decline in the number of children and also a fall in many adult age groups (along with some increases). The original HENA (2018) ([HBC2.003A](#)) found a general trend of increased reliance on the rental market predicted in the future.

Table 2: Dwelling stock in Hyndburn (take from Live Table 100)

		Year	Local authority	Private registered provider	Other public sector [note 5]	Private sector	
		2018	0.1	13.3	0.0	86.6	
		2019	0.1	13.4	0.0	86.5	
		2020	0.1	13.2	0.0	86.7	
		2021	0.1	13.2	0.0	86.7	
		2022	0.0	13.2	0.0	86.8	
		2023	0.0	13.3	0.0	86.7	
		2024	0.0	13.3	0.0	86.7	
	<p>3. Part 2 of the policy states that a mix of affordable housing units should be provided in accordance with the most up to date assessment of need. Does the Plan provide clarity on what this is referring to and where this is available? Could a developer prepare their own assessment?</p>	<p>The most up to date assessment of need is in the HENA (HBC2.003b), however the policy provides for future updated assessments to be considered once finalised by HBC.</p> <p>The Council would also be happy to receive and consider developer assessments if they are based on robust evidence to support proposals of an alternative housing mix.</p>					
	<p>4. The Local Plan Economic Viability Assessment recommends in paragraph 12.85 a) that the affordable housing requirement on brownfield sites should be reduced to 10%. It is also stated that greenfield sites in lower value areas to the east of the Borough are not viable with 20% affordable housing. Is the requirement in Policy SP10 for 20% affordable housing on all sites of 10 or more dwellings justified by the evidence?</p>	<p>Please refer to the Council’s response to the initial Inspectors questions (H002, question IQ19), which concludes that the Council consider that the requirement for affordable housing (79 households per annum needs not being met by the market) highlights a pressing need to ensure the maximum delivery of affordable homes where there is potential to achieve this.</p> <p>Therefore, setting the threshold too low may stifle supply of this need on sites which may be able to achieve this in both the current and future housing market.</p>					
	<p>5. Is it clear from the supporting text what the relationship is between Strategic Policy SP10 and Policy DM12 of the DM DPD and how they will be used in the consideration of planning applications?</p>	<p>DM12 has outdated thresholds for affordable housing provision compared to the latest evidence and contradicts national policy. Therefore, once adopted, where SP10 is found to contradict DM12, SP10 would take precedent. The Council propose a modification to paragraph 6.10 of the supporting text as follows:</p> <p><i>“6.10 The Council acknowledges that economic circumstances may alter during the plan period and in addition grant assistance may assist the delivery of higher numbers of affordable homes on sites where viability is an issue. As such, 20% is considered to remain an appropriate starting point for affordable housing requirements in this plan. Policy SP10 refers to the fact that affordable housing provision will be sought ‘where viable’. Further</i></p>					

		<p>information is provided in DM DPD Policy DM12 on how viability will be taken into account in determining affordable housing requirements. <u>It should be noted that Policy DM12 has outdated thresholds for affordable housing provision compared to the latest evidence. Therefore, where SP10 is found to contradict DM12, the thresholds in Policy SP10 would take precedent.</u>"</p>																																																																								
<p>Custom and Self Build Homes</p>	<p>6. Paragraph 62 of the Framework states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including for those who wish to commission or build their own homes. The Plan states that due to the low level of demand, suitable planning permissions for custom and self-build homes can be provided through the Development Management function. What evidence is to support this approach? Is the Plan consistent with the Framework in regard to custom and self-build homes?</p>	<p>HBC has maintained a self-build register which has attracted very limited interest. This is evidenced by reviewing the DELTA returns to the Government which have been submitted by the Council. As shown below, there has been very limited interest in the Self Build register and zero planning permissions recorded for serviced plots suitable for self and custom build.</p> <p>The Council considers that they are meeting footnote 28 of the Sep 2023 NPPF by maintaining a self-build register. Due to the low level of demand highlighted above the Council consider that the Local Plan’s approach is consistent with the framework and a policy that sought to establish size, type and tenure requirements would act as a constraint rather than facilitate custom and self-build housing.</p> <p style="text-align: center;">Right to Build Register Monitoring</p> <hr/> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2"></th> <th colspan="2">1. How many entries on your register in the second base period, 31 October 2016 to 30 October 2017?</th> <th colspan="2">2. How many entries on your register in total (i.e. base period 1 plus base period 2?)</th> <th colspan="2">3. How many planning permissions for serviced plots suitable for self and custom build have been granted to 30 October 2017?</th> </tr> <tr> <th></th> <th>ONS code</th> <th>Local planning authority</th> <th>a. individual</th> <th>b. group</th> <th>a. individual</th> <th>b. group</th> <th></th> </tr> </thead> <tbody> <tr> <td>2016-17</td> <td>E07000120</td> <td>Hyndburn</td> <td>1</td> <td>0</td> <td>1</td> <td>0</td> <td>0</td> </tr> <tr> <td>2017-18</td> <td>E07000120</td> <td>Hyndburn</td> <td>2</td> <td>0</td> <td>2</td> <td>0</td> <td>0</td> </tr> <tr> <td>2018-19</td> <td>E07000120</td> <td>Hyndburn</td> <td>0</td> <td>0</td> <td>2</td> <td>0</td> <td>0</td> </tr> <tr> <td>2019-20</td> <td>E07000120</td> <td>Hyndburn</td> <td>2</td> <td>0</td> <td>4</td> <td>0</td> <td>0</td> </tr> <tr> <td>2020-21</td> <td>E07000120</td> <td>Hyndburn</td> <td>0</td> <td>0</td> <td>3</td> <td>0</td> <td>0</td> </tr> <tr> <td>2021-22</td> <td>E07000120</td> <td>Hyndburn</td> <td>..</td> <td>..</td> <td>..</td> <td>..</td> <td>..</td> </tr> <tr> <td>2022-23</td> <td>E07000120</td> <td>Hyndburn</td> <td>3</td> <td>0</td> <td>3</td> <td>0</td> <td>0</td> </tr> </tbody> </table>			1. How many entries on your register in the second base period, 31 October 2016 to 30 October 2017?		2. How many entries on your register in total (i.e. base period 1 plus base period 2?)		3. How many planning permissions for serviced plots suitable for self and custom build have been granted to 30 October 2017?			ONS code	Local planning authority	a. individual	b. group	a. individual	b. group		2016-17	E07000120	Hyndburn	1	0	1	0	0	2017-18	E07000120	Hyndburn	2	0	2	0	0	2018-19	E07000120	Hyndburn	0	0	2	0	0	2019-20	E07000120	Hyndburn	2	0	4	0	0	2020-21	E07000120	Hyndburn	0	0	3	0	0	2021-22	E07000120	Hyndburn	2022-23	E07000120	Hyndburn	3	0	3	0	0
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<p>Density</p>	<p>7. Are the density requirements in part 3 of Policy SP10 appropriate and justified? Is the policy sufficiently flexible to take account of the character and existing pattern of development in different parts of the Borough?</p>	<p>Yes, the policy sets density requirements which will ensure the efficient use of land. However, the last sentence gives flexibility stating that the prescribed densities can be deviated from where “specific circumstances exist to justify a lower density or use of an alternative density measurement”.</p>
<p>Five-year housing land supply</p>	<p>8. Is the Council able to demonstrate a 5-year supply of deliverable housing sites on adoption of the Plan and a rolling 5-year supply throughout the Plan period?</p>	<p>Yes, the Council believes that upon adoption of the Local Plan there will be a deliverable 5 year supply of housing. The Council have recently contacted all relevant landowners / agents with the vast majority confirming that the intention is to develop the site within the timeframes set out in the trajectory in the background housing supply paper (H8.001). Further information on delivery is set out in the Housing trajectory information (H012). Additional details of this can be found in the response to Matter 8 (EL3.008).</p> <p>In addition, work is progressing regarding the delivery of HGV as evidenced in the response to IQ11 (H002) and Matter 9 (EL3.009). Due to the multiple ownerships on the HGV site, there is potential for delivery of sites that are phased for later in the plan period to deliver earlier to ensure a contingency of housing supply at Huncoat Garden Village.</p> <p>Therefore, the Council believes it will be able to deliver rolling 5-year supply throughout the Plan period.</p>
	<p>9. Has the appropriate buffer been applied in accordance with paragraph 74 of the Framework?</p>	<p>Yes. Paragraph 74 of the NPPF (Sep 2023) requires a 5% buffer to be included where a Local Planning Authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year.</p> <p>As the Council wishes to confirm the existence of a five-year supply as part of the plan making process, a 5% buffer has therefore been included within the calculations. This is illustrated through the housing trajectory which illustrates the housing supply throughout the plan period on Appendix 2 of the Housing Topic Paper (H8.001).</p>