

Home Builders Federation (HBF) response to the
Lancaster District Strategic Policies & Land Allocations Development Plan Document and
Development Management Development Plan

Inspector's Matters, Issues and Questions

Matter 2: Housing

Main Issue: Whether the Council's strategy for meeting its housing requirement is sound?

Questions:

- a) *The identified objectively-assessed need (OAN) for housing for the area is 14,000 new dwellings (an average of 700 per year). The Council, as set out in policy SP6, identifies a requirement of 12,000 new dwellings at a rate of 522 per year. Is the Council's housing requirement soundly based and supported by robust and credible evidence? Does it take appropriate account of the 2012-based DCLG Household Projections, the likelihood of past trends in migration and household formation continuing in the future, and 'market signals'? Is the housing requirement appropriately aligned with forecasts for jobs growth? What implications should be drawn from paragraphs 7.9 – 7.13 of the Updated Consultation Statement February 2019, on the OAN figure.***

The HBF does not consider that the Council's housing requirement is soundly based and supported by robust and credible evidence. The Council's own evidence sets out an objectively assessed need (OAN) significantly above the housing requirement set out within the Plan. The Council do not consider that there is sufficient housing land supply to meet the OAN. The HBF continue to consider that there are further opportunities to work with the housing industry to identify further supply.

Whilst there is evidence to support the OAN it is not clear what evidence, other than some limited potential supply issues, have been considered in relation to the housing requirement, for example it is not clear how the housing requirement has taken into consideration migration, household formation, market signals or affordable housing requirements.

Given the evidence contained within the Council's own evidence that the demographic scenarios will not accommodate the level of jobs growth likely to occur, it can be concluded that the proposed housing requirement will not accommodate the levels of jobs growth likely to occur. Therefore, the HBF would suggest that the housing requirement is not appropriately aligned with the forecasts for jobs growth.

The HBF are concerned to read within paragraph 7.9 of the Updated Consultation Statement that there remains a lack of confidence in the validity and robustness of the OAN and how it has been delivered in the Local Plan process. This suggests that there may have been missed opportunities for the Council to have provided more information as to how the OAN has been determined, what it will mean for Lancaster and how it can be delivered. Whilst paragraph 7.13 of the Updated Consultation Statement seems to suggest that very little attention has been given to the OAN by the Council, it suggests that the level of supply determined by the Council and their approach in relation to it has been pre-determined and their own evidence in relation to the OAN has done very little to influence it.

Inspector's Matters, Issues and Questions

The HBF are also concerned that the Lancaster Independent Housing Requirements Study 2015, and subsequently the OAN Verification Study, provided a OAN for the period 2011 to 2031, this differs from the period used for the Housing Requirement in the Local Plan.

b) Are the constraints identified by the Council sufficient justification for not meeting the full OAN for housing in the District?

The HBF do agree that there are constrained areas within the Lancaster due to presence of the Arnside and Silverdale AONB and Forest of Bowland AONB, protected habitats and flood risk areas. The HBF do not consider however, that the constraints identified by the Council constitute sufficient justification for not meeting the full OAN for housing in the District. The 'Assessing the Reasonable Alternatives' paper does not provide sufficient justification to explain why the Council cannot meet the OAN. It is noted that alternate sites have been considered at previous stages in the consultation and it is not always evident why these sites are not considered appropriate to contribute to meeting the full OAN for the district.

c) What provision has the Council made for any unmet housing need and does the housing requirement take appropriate account of the need to ensure that the identified requirement for affordable housing is delivered?

The Local Plan does not appear to set out what provision the Council has made for the unmet housing need.

The Duty to Cooperate Statement states that the Council has formally asked authorities within the Housing Market Area to meet some of its requirements, and that responses from these authorities have highlighted that there have been no opportunities for delivery of Lancaster's housing needs outside of the local authority boundary. Therefore, there is no agreement for the unmet housing need to be provided outside of Lancaster district.

It is not clear if the proposed housing requirement takes appropriate account of the need to ensure that the identified requirement for affordable housing is delivered. The SHMA Part II 2018 identified an annual imbalance of 376 affordable homes across Lancaster each year. Whilst it does state this should not be seen as a target it does demonstrate the scale of need which the Council should be trying to address. Given the housing requirement of 522 homes each year and an affordable housing policy with a policy requirement of between 20% and 40% it seems unlikely that the affordable housing needed will be provided.

d) Is the Housing Market Area (HMA) agreed with adjoining authorities in line with the Planning Practice Guidance and does the plan period coincide with housing projections?

The HBF note that the SHMA (Feb 2018) states that Lancaster District continues to operate as a self-contained Housing Market Area. It does however highlight that there are relationships with adjoining areas including South Lakeland, Wyre and Preston. The Duty to Cooperate Statement identifies a HMA overlap with Wyre, South Lakeland, Ribble Valley and Craven. Whilst paragraph 4.1 of the Duty to Cooperate Statement states that

Inspector's Matters, Issues and Questions

there are 14 authorities within or adjoining the Housing Market Area. The Duty to Cooperate Statement states that the Council has contact with these authorities, it is not clear however, whether they have agreed the HMA.

The housing requirement is for 12,000 homes over the period 2011/12 to 2033/34. This is not the same period as the plan period which covers 2011 to 2031/32. The SHMA (2018) appears to cover the period 2017 to 2033.

e) Are the DPDs clear as to the identified need for additional pitches for gypsies and travellers (policies SP6 and DM9) and is the identified need soundly based and supported by robust and credible evidence?

The HBF do not wish to comment on this question.

f) Is the amount of land allocated for housing sufficient to meet the requirement and how will it ensure delivery of the appropriate type of housing where it is required within the District (with particular reference to Policies SP2, SG1, SG7, SG9, H1, H2, H3, H4, H5, H6, DOS7, DM1, DM2, DM4, DM7, DM8, DM11 and DM12)?

Policy H1 identifies 19 sites with capacity for approximately 6,938 dwellings in the urban area, however, this includes 3,500 homes at Bailrigg Garden Village, which the Council identifies will not all come forward within the plan period. It is anticipated that only 1,655 homes will come forward in the period to 2034 on the Bailrigg Garden Village site, which means only 5,093¹ homes in the period to 2033/34. Policy H2 identifies 13 sites in the rural area with capacity for approximately 1,024 homes. This gives a total of approximately 6,117 homes.

Policy SP6 sets out the potential supply of homes, it identifies the allocated sites to have potential capacity for 6,121 homes, it also identifies a potential capacity for non-allocated sites with permissions (1,679 dwellings), student accommodation (1,407 dwellings), sites in the Arnside and Silverdale AONB (22 dwellings) and additional supply including neighbourhood plan delivery (1,385 dwellings), totalling 10,614 homes. Policy SP6 also sets out the completions between 2011/12 – 2015/16 as 1,442 dwellings.

According to the 2018 Housing Land Monitor in the period 2011/12 to 2017/18 2,595 homes were completed, including the student and residential institution units.

Year	Completions (of which are student and other residential institution units)
2011/12	109 (10)
2012/13	235 (74)
2013/14	144 (3)
2014/15	473 (48)
2015/16	483 (24)
2016/17	628
2017/18	523 (27)

¹ 6,938 – 1,845

Inspector's Matters, Issues and Questions

Total	2,595 (186)
--------------	--------------------

There appears to be limited information and evidence available to support the Council in their assumptions in relation to the supply and capacity of each of the sources of supply. It is therefore difficult to determine if the amount of land allocated for housing is sufficient to meet the requirement. Due to the limited information available about all of the supply it is not evident how the Council will utilise the supply and ensure it will deliver the appropriate type of housing where it is required within the District by the Local Plan policies.

The HBF also 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 may occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.

g) Will the distribution, capacity and speed of deliverability (with regard to viability and infrastructure) of the sites, satisfy the provision of a 5 year housing land supply?

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. However, there is little evidence provided to support the deliverability of the sites included within the 5-year supply. The HBF would therefore encourage the Council to ensure that a 5-year supply can be provided.

h) Do the DPDs make provision for addressing inclusive design and accessible environments issues in accordance with the NPPF?

The HBF do not wish to comment on this question.

i) Is the proposed monitoring likely to be adequate and what steps will be taken if sites do not come forward?

The Submission document states that a separate report setting out the monitoring framework will be prepared. The HBF recommends that appropriate targets are introduced and that specific monitoring triggers are used, with actions identified along with appropriate timescales. This will help to ensure that action will be taken when a target is not met, and a policy needs reviewing. In relation to sites this could include working with the landowner and / or developer, the CPO of land, provision of infrastructure, swift preparation of S106 agreements, efficient discharge of conditions and potentially identifying further sites to allocate. It would be beneficial if the monitoring and implementation framework was included within the local plan.

j) How will the housing allocations in the DPDs deliver the affordable housing set out in policies DM3 and DM6? What is the likely effect of DM6 on viability?

The HBF would assume that during their consideration of the deliverability of the sites proposed to be allocated, the Council have considered the level of affordable homes to be provided and the viability of the sites. However, based on the evidence provided the HBF is not in a position to confirm whether the housing allocations are likely to deliver the affordable housing set out in the Local Plan policies.

Home Builders Federation (HBF) response to the
Lancaster District Strategic Policies & Land Allocations Development Plan Document and
Development Management Development Plan
Inspector's Matters, Issues and Questions

It is not apparent that the Viability Assessment Report 2018 has considered the requirement within Policy DM6 for new housing development to deliver no less than 50% affordable housing on all sites of two or more dwellings in the Forest of Bowland AONB. It is however noted that the Viability Report does highlight only a small surplus for other planning contributions on greenfield sites with the 40% affordable housing requirement.

k) How do the DPDs sit with the aim of the NPPF to create sustainable, inclusive and mixed communities (Policy SP9)?

The HBF do not wish to comment on this question.

l) Are policies EN6 Strategic Policies & Land Allocations DPD and DM49 of the Development Management DPD on the Green Belt consistent with the NPPF?The

HBF do not wish to comment on this question.

m) Could the Council provide clarification on the amount of housing to be provided within individual neighbourhood plans (Policies SC1 and DM54)?

The HBF do not wish to comment on this question.

Inspector's Matters, Issues and Questions

Matter 7: Environment

Main Issue: Are the DPDs in accordance with the NPPF in respect of open space, recreation, design and renewables.

Questions:

a) Would policies DM26, DM27, DM30, DM31, DM55, DM56, DM57 and DM58 adversely affect development viability?

It does not appear that the Viability Assessment has considered any viability impact from Policy DM58 in relation to the provision of broadband and communications technology within residential developments. The HBF consider that in relation to Policy DM58 the requirement for all major developments to enable fibre to the premises could potentially have an impact on viability, particularly where there are issues with the intervening connectivity infrastructure.