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26/01/2022

Dear Planning Policy Team,

## **WEST LANCASHIRE LOCAL PLAN 2023-2040: ISSUES AND OPTIONS CONSULTATION**

1. Thank you for consulting with the Home Builders Federation (HBF) on West Lancashire Local Plan 2023-2040: Issues and Options 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 multi-national 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.

### **HC01a – WHERE HOUSING CAN GO**

3. The Council propose to allow housing within settlements outside the Green Belt (as long as it is in accordance with other Local Plan policies), more in the larger towns and less in the smaller villages. Whilst, in the Green Belt, only allow housing where national policy permits it, including for rural exceptions. They also consider other options including continuing with the approach from the currently adopted Plan, being more restrictive or less restrictive.
4. The HBF considers that taking a positive approach that supports residential development in sustainable locations is appropriate.

### **HC01b – USING LAND EFFICIENTLY**

5. The Council propose to encourage the development of brownfield sites but recognise that the need to ensure schemes are viable is a factor and recognise that some brownfield sites can have value. The Council also proposes to set a minimum density standard, expect to be 30dwellings per hectare (dph), with higher densities of 40-50dph expected on urban sites with good public transport access.
6. The HBF considers that supporting the development of sustainable sites is appropriate, this may mean that more brownfield sites are supported, but also allows for consideration to other elements of sustainability for both brown and greenfield sites. The HBF considers that the Council should ensure that the Plan is viable and deliverable, and this should include, policies and allocations and any prioritisation given to brownfield sites.



7. The HBF considers that it is likely to be appropriate to have a flexible density policy that recognises that different areas within West Lancashire are likely to be able to support different densities, but also taking account of viability, site characteristics and market demand.

#### **HC01c – DWELLING SIZES**

8. The Council propose to have a required mix of dwelling sizes for new developments based on the Council's evidence, this would form the starting point for any negotiations.
9. The HBF understands the need for a mix of dwelling types and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF considers that the Council should also be aware that their evidence will only ever provide a snapshot in time and may be superseded by other evidence as development comes forward and need, demand or aspirations change.
10. The Council will need robust justifiable evidence to introduce the nationally described space standards (NDSS), based on the requirements set out in the PPG. The HBF recommends that the Council consider the potential impact this requirement will have on viability and the affordability of homes for local residents who will often consider homes on their number of bedrooms rather than square footage.

#### **HC01d – AFFORDABLE HOUSING**

11. The Council propose to require a percentage of affordable homes in developments of 10 or more dwellings. The Council expects this percentage to be lower in Skelmersdale due to viability issues. The Council would aim to ensure a mix of affordable housing tenures are provided based on national policy and viability evidence.
12. The HBF considers that it is important that the Council seeks to address their affordable housing need. However, the Council will need to ensure they have an appropriate and viable balance between the delivery of homes and the delivery of affordable homes. The Council will also need to ensure that they are consistent with national policy in relation to the provision of homes for affordable home ownership and First Homes.

#### **HC01e – HOUSING FOR OLDER PEOPLE**

13. The Council propose to support the provision of accommodation for older people in appropriate locations, they plan to require all new dwellings to meet the M4(2) accessibility standard and for a proportion of homes to meet the M4(3) requirements.
14. The HBF is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible & adaptable homes the Council should only do so by applying the criteria set out in the PPG. PPG<sup>1</sup> 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

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<sup>1</sup> ID: 56-007-20150327

accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.

15. The HBF considers that it would be appropriate for the Council to support the provision of accommodation for older people or specialist housing in appropriate locations or in locations that can be made appropriate or will be appropriate as part of a wider development in the area. The HBF would also generally support the Council in looking to allocate specific sites for the development of older people's or specialist accommodation. The HBF recommends that the Council works closely with providers of older persons accommodation to determine the most appropriate allocations and policies.

#### **HC01f – CUSTOM AND SELF-BUILD HOUSING**

16. The Council propose to take a more positive approach towards Self and Custom Build homes, requiring a proportion of plots on large housing sites to be set aside for Self and Custom Building homes, with a number of small to medium sites allocated for Self and Custom Built homes.
17. The HBF generally supports the idea of taking a more positive approach to the self-build and custom build sector as it has potential to make a contribution to the overall housing supply. However, the HBF considers that the Council needs to consider the practicalities of requiring a proportion of these homes on large housing sites, not only in relation to the viability of the site but also in relation to the practicality of constructing the site, and the desire of self-builders to live in these areas. The HBF would recommend that the Council bases its policy on the evidence provided by its self-build register, and that it works closely with the self-build community and local landowners to ensure that the appropriate policy is put in place.

#### **HC02 – PLACE-MAKING**

18. The Council proposed to take an approach that would prioritise local health, support active travel and the creation of 20-minute neighbourhoods with nature within easy reach of everyone.
19. The HBF generally accepts the principles of the 20minute neighbourhood, these principles may be appropriate as a thread to run throughout the Local Plan. However, it will be important for the Council to maintain some flexibility to this policy approach and to ensure that it allows for the development of areas where there is the potential to create a 20minute neighbourhood.

#### **TI02 – PARKING STANDARDS AND ELECTRIC VEHICLE CHARGING POINTS (EVCPs)**

20. The Council propose to maintain their current policy which sets car parking standards, agreed between all of the Lancashire authorities, this includes setting a minimum number of Electric Vehicle Charging Points (EVCPs).
21. The HBF recognises that electric vehicles will be part of the solution to transitioning to a low carbon future. However, the Council should acknowledge that this proposed policy approach has been superseded by Part S of the Building Regulations and is not likely to

be needed. The inclusion of EVCP requirements within the Building Regulations has introduced a standardised consistent approach to EVCPs in new buildings across the country, and it is not necessary for local planning policy to repeat them.

#### **TI05 – ENERGY EFFICIENCIES IN NEW BUILDINGS**

22. The Council propose to require major residential developments to deliver energy efficiency improvements that go beyond national standards. They are looking for developers to monitor energy efficiency, to evaluate performance and to ultimately achieve zero net carbon goals.
23. The Council should note that today's new homes are very energy efficient with lower heating bills for residents compared to existing older homes. The HBF supports moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements, which is universally understood and technically implementable. The HBF considers that the Council should work with the homebuilding industry closely to ensure that any changes to the Plan are both realistic and viable, and that as far as possible they do not overlap with changes being made at a national level.
24. There are numerous potential policy approaches that could contribute to mitigating against climate change and help towards a zero-carbon future including: reducing greenhouse gases; the location of development and services; active and sustainable transport; digital technology and connectivity; water issues; energy provision; the impact of development on biodiversity and nature; what resources are used, and waste is produced; air quality; flood and climate resistance; the wider effect housing has on its social and built environment. However, these policies may also require input and collaboration from a broad range of stakeholders, which will also need to be given consideration. Technologies will need to be developed and proved and then mainstreamed – not least with regards to post gas heating solutions; whilst consumers will need to be consulted with and educated as new technologies emerge. Supply chains will need to be created; new skills and training developed for production and maintenance of new technologies, and person capacity built. The Council will need to ensure that the any policies introduced are deliverable and viable and have the support of all of the industries and sectors involved.

#### **TI06 – WATER EFFICIENCY**

25. The Council propose to introduce a policy that would ensure that developments provide greater levels of water efficiency than currently required though Building Regulations.
26. As set out in the NPPF<sup>2</sup>, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in

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<sup>2</sup> Paragraph 31

the PPG. PPG<sup>3</sup> states that where there is a 'clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day'. PPG<sup>4</sup> also states the 'it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement'. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas.

#### **OT02 – VIABILITY**

27. The Council proposes to set out a hierarchy of viability ranking the different policies requirements in terms of priority, this could be varied by area or type of development. The HBF appreciates the potential flexibility that this policy may provide, however, it is likely to depend on the precise wording of the policy.

#### **OT03 – DEVELOPER CONTRIBUTIONS**

28. The Council propose to follow their current approach of requiring certain developments to provide contributions towards funding or delivering new infrastructure requirements. The HBF considers that the Council will need to determine the viability of the Plan and all of its policies and requirements including any S106 requirements.

#### **Future Engagement**

29. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

30. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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<sup>3</sup> ID: 56-014-20150327

<sup>4</sup> ID: 56-015-20150327