

Central Lancashire Team

SENT BY EMAIL

centrallancashireplan@chorley.gov.uk

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Dear Central Lancashire Team,

CENTRAL LANCASHIRE: APPROACH TO THE PROVISION AND DISTRIBUTION OF HOUSING LAND

Thank you for consulting with the Home Builders Federation on the Central Lancashire proposals regarding the provision and distribution of housing land.

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.

Local Housing Need

The HBF support the Central Lancashire Authorities (Preston City Council, South Ribble Council and Chorley Council) in using the standard method as the starting point to assess housing need for the area. However, it should be noted that assessing the housing need is only the first step in determining how many homes need to be planned for and it should be undertaken separately from assessing land availability and establishing a housing requirement. It should also be noted that, as set out in the PPG (ID 2a-002), the standard method identifies a minimum annual housing need figure, it does not produce a housing requirement.

The HBF generally consider that paragraph 3.2 to 3.10 of the Central Lancashire Housing Study (October 2019) appropriately set out the Local Housing Need (LHN) for each authority following the Standard Method as set out in the PPG. With the standard method housing figure for each authority identified as follows:

- Chorley Council – 579dpa
- Preston City Council – 241dpa
- South Ribble Council – 206dpa
- Central Lancashire Area – 1,026dpa

The PPG sets out circumstances when there might be a higher housing need than the standard method indicates this includes where there are growth strategies for the area, strategic infrastructure improvements, taking on an unmet need from neighbouring authorities, where previous levels of housing delivery or previous assessments of need are significantly greater than the standard method.

The HBF considers that for Central Lancashire the housing need is higher than the figure provided by the standard method.

Table 4.6 of the Central Lancashire Housing Study identifies the housing completions in Central Lancashire between 2014/15 and 2018/19. This shows that the housing completions over the 5-year period are as follows:

- Chorley Council – 614dpa
- Preston City Council – 596dpa
- South Ribble Council – 371dpa
- Central Lancashire Area – 1,581dpa

These completions figures are considered to be significantly greater than the standard method, at 555 dwellings more each year or 54% more than the figure identified by the standard method. It is therefore considered that the housing need is higher than that identified by the standard method alone.

In addition, there are funding schemes in place across the region including the Preston, South Ribble and Lancashire City Deal (2013) is a £430m fund intended to bring forward 30 years of growth in a decade – creating 20,000 jobs, 17,000 new homes and delivering multi-million pound infrastructure improvements for our communities. And the Lancashire Growth Deal (2014) which provides £320m to support economic growth in the area.

There are also strategic infrastructure improvements in place including the £200m Preston Western Distributor scheme which will be built between the M55 and a new junction with Blackpool Road at Lea and is scheduled to open in 2023. This infrastructure is intended to support the delivery of the North West Preston strategic housing location and to improve access to the strategic road network from the Enterprise Zone at Warton.

The HBF therefore considers that the housing need is considerably higher than that provided by the standard method, and that the Central Lancashire Team will need to increase the housing need figure taking into consideration the circumstances set out in the PPG. It should also be remembered that in determining the housing need it is not appropriate to consider the land availability.

Distribution of Need

Table 4.13 sets out the recommended distribution of Housing Need for Central Lancashire, it recommends the following:

- Chorley Council – 27.5% / 282dpa
- Preston City Council – 40% / 410dpa
- South Ribble Council – 32.5% / 334dpa

Whilst it is agreed that PPG (ID: 2a-013) states that where strategic policies are brought produced jointly, local housing need assessments may cover more than one area and that in such cases the housing need for the defined area should be at least the sum of the local housing need for each local planning authority within the area. And that it will be for the relevant strategic policy-making authority to distribute the total housing requirement which is

then arrived at across the plan area. It is not clear from the evidence provided why the precise proportions that have been proposed are as they are. It is not clear for example why greater consideration should be given to the existing spatial strategy, the urban capacity or land not subject to national constraints over the evidence in relation to the local housing need identified for each authority or to the level of historic completions. For example, would the historic completions potentially be a more useful indicator than the existing spatial strategy, as it is likely provide more insight into development needs and demands.

Given the identified issues with the local housing need currently identified and the need for it to be increased to reflect the circumstances identified above, the HBF would suggest that there may be potential for each of the authorities to meet the standard method figure as a minimum before further increases are added to allow for any a different spatial distribution as robustly evidenced and determined by the strategic plan making authority. It is recommended that the spatial distribution of housing follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas.

The HBF consider that at this stage it is not appropriate to determine the spatial distribution of housing need and that further work should be undertaken to ensure that robust evidence is provided. The HBF consider that further and longer consultation will be required alongside more detail of the spatial strategy for the plan area before any reasonable responses can be provided to this consultation.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Joanne Harding', written in black ink.

Joanne Harding

Local Plans Manager – North

Email: joanne.harding@hbf.co.uk

Phone: 07972 774 229