

#### **4A: Overall Housing Strategy**

##### **4A(i)**

- 4.1 The County Council has had only limited involvement in the procedures used to develop the housing numbers in Table 9.1. Most discussions have been between NWRA and Districts. The RSS Technical Appendix acknowledges that the distribution of housing provision has not followed any mechanistic formula. The Technical Appendix also recognises that there is incomplete information and variations in approach regarding urban potential for housing. The views of the Lancashire District Councils on the appropriateness, or otherwise, of the figures in Table 9.1 for their area will be important. Districts will be able to offer this advice to the Panel during the debates on Matters 8, 9 and 10.
- 4.2 Policy L4 is broadly supported. The numbers expressed in Table 9.1 for future housing provision seem generally achievable in the context of past trends and generally reflect the spatial framework though:
- Future provision in Burnley District is lower than might have been expected, given the growth strategy to be pursued in CLCR. It is much lower than the equivalent number for Blackpool, Preston and Blackburn. In the East Lancashire “cluster”, the figure for the most urbanised district, Burnley, is lower than those for Pendle and Rossendale. RSS should include a reasoned justification for this position;
  - There are consequential implications for travel-to-work and access to services. Table 9.1 does not sit fully square with Policies RDF1 (Table 7.1) and W5, again particularly with regard to Burnley.

##### **4A(ii)**

- 4.3 At the North West level, the regional housing completion rates since 2001 have been considerable below the 22,844 per annum advocated in Table 9.1 (RPG13 Annual Monitoring Report, February 2006). Yet, at the Lancashire level, the annual average completion rate since 2001 has been slightly above the total for the County implied by Table 9.1 (4,600 compared with 4,400). The pattern is repeated within Lancashire: annual completion rates in the more rural and suburban Districts are already at or above the RSS figure in Table 9.1, while the more urbanised Districts of Preston, Blackburn with Darwen and Blackpool need to see accelerated house completions to get into line with their RSS figures (Joint Lancashire Structure Plan Monitoring Report 9, Table 1).
- 4.4 A high economic growth scenario underpins RSS Table 9.1 and results in a substantial increase in housing numbers in the metropolitan and more urbanised areas of the Region. If high economic growth fails to materialise it would seem likely that housing demand in the more rural and suburban Districts of the Region would result in house construction in those areas in line with the numbers set out in Table 9.1, with the shortfall in regional housing performance being concentrated in metropolitan and larger urban centres. This would damage the regional spatial

framework set out in Policy RDF1 through a decentralised pattern of new housing development.

4.5 To counter this possibility:

- The Implementation Plan needs to be enhanced to clearly set out how the higher rates of housing delivery in metropolitan and urban centres will be achieved.
- RSS paragraph 9.20 should cross-refer to Draft PPS3 paragraph 10 to encourage local planning authorities to re-open consideration of the level of provision in the area if there has been a significant change in housing market circumstances.

4.6 In paragraph 9.20, given that Table 9.1 is net of clearance replacement, the relevance of major housing renewal to the level of net additional housing building is not understood. This reference could be deleted.

#### **4A(iii)**

4.7 Table 9.1 refers to 'maximum housing provision'. This is acceptable in the context of being based on high economic growth which may not materialise, and certainly the figures should not be regarded as a minimum to be achieved. However, to make Table 9.1 all square with Draft PPS3 it may be better to refer to 'future housing provision' instead.

4.8 The use of 'annual average rates' in Table 9.1 and paragraph 9.20 is supported. The annual figures to be achieved are averages, not absolute annual targets. It is anticipated that regular monitoring and management of the housing land supply will directly inform the position of potential oversupply or undersupply. Consequently, any housing provision achieved in the early part of the plan period should inform any necessary adjustment for the subsequent period up to 2021.

4.9 The final sentence in draft RSS paragraph 9.22 refers to "target". This should be amended.

#### **4A(iv)**

4.10 Phasing of land (e.g. 2003-8; 2008-21) might be useful if only because the first period will have also almost elapsed by the time RSS is issued by SoS. This phasing could also have been used to reflect changes in the rates of demographic and economic growth expected in the future. However, the reliability of these would be open to question. The 'plan, monitor, manage' approach set out in paragraph 5.20 may suffice.

**4A(v)**

- 4.11 Paragraph 5 of draft PPS3 states what Regional Spatial Strategies should contain. Submitted Draft RSS reflects criteria (a), (e) and (h) of draft PPS3. The groups of districts in Policy 4 may not necessarily represent housing market areas – they are ‘clusters of districts’ (see Paragraph 4.75 of the Submitted Draft RSS Technical Appendix). The Submitted Draft RSS does not, therefore, fully reflect criteria (b), (c) and (d) of draft PPS3, though the approach taken in RSS is necessary because of the requirement set out in PPS11 for RSS to provide District level housing figures (PPS11, paragraph 1.5).
- 4.12 Submitted Draft RSS does not make any reference to density, whether as targets or ranges. It does not, therefore, reflect criterion f of draft PPS3.
- 4.13 It is noted that Policy L5 anticipates those areas where the greatest need will be. As is the case with other policies in Submitted Draft RSS it is prefixed by the phrase “Plans and strategies should..”. In doing so it is laying a very considerable duty on local planning authorities to undertake further work within the LDF process. In this particular instance this phrase is considered to be appropriate as all district councils and unitary authorities are required to carry out Housing Needs Surveys in their area. It is considered that it does not set out the region’s approach to meeting affordable housing needs, however the approach is considered to be appropriate in terms of promoting integrated and balanced communities in areas of identified need. It does not fully reflect criterion (g) of draft PPS3.
- 4.14 In respect of criterion (i) of draft PPS3 it is considered that the approach to meeting rural housing and rural affordable housing needs is addressed in the rural areas policy – Policy RDF3 and through Policy L5 respectively.