

**Text of Inspector's first letter – 15 June 2011**

*(i) You will recall that in my announcement at the beginning of the Hearing on Tuesday 12 July 2011, I said that I had very grave doubts that the Core Strategy in its present form was sound in its housing policies. In his note of 28 April 2011, the Programme Officer stated that I would need to be satisfied that a sufficient amount of housing could be delivered at the right time and in the right places during the plan period. I have to say that, having considered the evidence from all the participants, I am not persuaded that this has been achieved. I am not convinced that, in matters of housing, the Core Strategy generally conforms with the Regional Spatial Strategy (RSS), and I am not persuaded that matters should be put right in the Site Allocations Development Plan Document (DPD). In my view, the Core Strategy should provide a suitable framework for the preparation of the next generation of plans, particularly the Allocations DPD, by leaving no doubt where, when and how the correct amount of housing will be delivered. I conclude, therefore, that the Core Strategy is not sound in these matters.*

*(ii) The purpose of this letter is to suggest ways in which the Core Strategy can be made sound with regard to its housing policies. As accepted at several Hearings, the RSS to 2021 forms part of the development plan for Central Lancashire and its Policy L4 states that local planning authorities should assume that the average annual requirement set out in its Table 7.1 will continue for a limited period beyond 2021. I therefore consider that the Core Strategy should adopt the annual net requirement of 1341 dwellings set out in that Table, allocated as indicated to Chorley (417), Preston (507) and South Ribble (417). This equates to a total of 21,456 dwellings during the 16 year period 2010-2026 and it should be included in Core Strategy Policy 4. As RSS paragraph 7.19 states, the annual average figures are not absolute targets and may be exceeded where justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub-regional strategies. For this reason, and owing to such considerations as the Government's agenda for growth, the relationship between housing and the economy and the Core Strategy's suitable acknowledgement at paragraph 9.1 of the considerable economic growth potential of Central Lancashire, this annual and total provision should be regarded as a minimum requirement.*

*(iii) The Core Strategy should look to the long term and it should include provisions showing where and when the components of the total housing requirement will be delivered throughout the stages of the plan period up to 2026. You will recall my hand-written note of 29 June 2011 which set out a theoretical delivery strategy concerning 15,000 dwellings during a plan period of 2010-2026. I consider that this sort of approach would be a vital addition to the Core Strategy. It would, for example, provide a greater certainty for developers, the public and the providers of the phased and necessary infrastructure. It would assist the monitoring and implementation of the strategy, it would set the scene for the Allocations DPD and it would accord with Planning Policy Statement (PPS) 12 paragraph 4.1 by setting out how much development is intended to take place where and when and by indicating by which means it will be delivered. It would also mean that decisions upon planning applications could be given a clear steer immediately. In particular, it should show how the requirement to deliver a 5 year supply of housing land can be met. Several participants refer to a backlog of housing completions. Ideally, this should be made good as soon as possible. Owing to the present state of the economy, however, I doubt that this can be rectified during the early stage of the plan period. I think that it would be more realistic to expect this to take place fairly steadily throughout the plan period. It is another reason for regarding the total housing provision as a minimum requirement.*

*(iv) I must also invite you to give further consideration to PPS 12 paragraph 4.46 concerning flexibility, a matter discussed at the Hearings and upon which participants have commented following my draft addition to the Core Strategy. The paragraph refers to alternative strategies and what would trigger their use. This, I believe, is a matter of soundness, and I consider that the Core Strategy should be clear and more robust on how it would handle contingencies.*

*(v) These draft recommendations imply the identification of strategic site or sites and/or of strategic location(s) to accommodate the RSS housing figures and this may mean further consultation and sustainability assessment. They also imply changes to the text, especially Policy 4 and paragraphs 8.12 and 8.13. I would welcome written representations on these draft recommendations from you and from all those who have participated on the subject of housing. These should be with the Programme Officer by Friday 12 August 2011. I then invite you to take these representations into account as you progress the Core Strategy. To assist the process, I will do as much as I can forthwith in the preparation of my Report.*

*Richard E Hollox  
Inspector  
15 July 2011*