



THE HOME BUILDERS FEDERATION

Date: 30th October 2015
Consultee ID: 109
Matter: 1

PRESTON CITY CENTRE PLAN EXAMINATION HEARINGS

Issue 3 – Does section 2 of the CCP set out a positively prepared strategy for the delivery of employment, retail, leisure and housing development in the city centre, which is justified, effective and consistent with national policy?

1. The HBF would like to submit the following further comments in respect of Issue 3. We have no further comments upon questions a) to k).

Housing development

l) Is the overall amount of housing provision in the CCP consistent with the Core Strategy? How will the policies and proposals in the CCP help to deliver a five year supply of housing land?

Yes, it is considered that the overall amount of housing provision identified within the CCP is consistent with the Core Strategy.

The Core Strategy policies, whilst not necessarily prescriptive, identify provision for at least 600 dwellings through the ‘*Central Preston Strategic Location*’. This includes an area greater than the CCP. The preamble to Policy SP4 clearly states that despite the wider area definition it is the Council’s intention to provide at least 600 dwellings within the CCP area. The subsequent Local Plan (Site Allocations and Development Management Policies) examination was predicated upon delivery of 600 dwellings from the CCP area. Therefore to be considered positively prepared and effective it is important that the policies and allocations contained within the CCP provide at least 600 dwellings.

The principle concern of the HBF is, therefore, not the conformity with the Core Strategy but whether the 600 dwellings identified for delivery through the CCP will be delivered.

m) How many dwellings are likely to be built in the Inner East Preston Area over the Plan period, and therefore contribute towards delivery of the minimum housing requirement of 600 dwellings for the Central Preston Strategic Location? What stage has the emerging Neighbourhood Plan for the Inner East Preston Area reached?

The HBF consider this a matter for the Council to address. It is, however, considered that our comments upon issue 3l above are relevant.

n) The housing supply figures in Table 4 include a windfall allowance of 200 dwellings for commercial conversions arising from permitted development rights. What evidence has been used to inform this estimate? What recent rates of conversion have taken place in the city centre?

The NPPF, paragraph 48, is clear that any windfall allowance must be based upon compelling evidence and that such sites have consistently become available and that they will continue to provide a reliable source of supply. The HBFs primary concern with the CCP is that the plan is overly reliant upon windfalls to fulfil the proposed 600 unit housing provision. Currently windfalls are proposed to account for between 33% and 62% (dependent upon whether Winckley Square and Horrocks Quarter are considered windfalls or will be specific to the allocation of the opportunity areas) of the overall housing provision identified for the CCP.

The HBF note that in response to our comments upon the publication version of the plan (examination document CCPSD005) the Council identify that as of 31st March 2014, 196 units had been granted consent through permitted development rights in the city centre, of which 109 are known to be under construction. This is considered encouraging. However, whilst the HBF has no reason to doubt the Council's claims it is unclear where this evidence is provided. The Council refer to the Housing Land Position Paper (presumably referring to examination document CCPED058) a review of this evidence does not appear to clearly set out this information.

Given the heavy reliance upon windfalls and the need to provide compelling evidence that such sources of supply will continue to be brought forward within the CCP the HBF therefore request further clarity and evidence upon this issue.

o) Policy SP4 includes an element of windfall supply arising from the Winckley Square and Horrocks Quarter Opportunity Areas.

- ***Does this source relate to new build properties and/or conversions not captured under permitted development rights (see above question)?***
- ***What evidence has been used to inform these estimates?***
- ***Why are similar windfall estimates not included for the other Opportunity Areas?***
- ***Why are these windfall estimates included in Policy SP4 on Housing Allocations rather than being listed as a potential source of housing supply in Table 4?***

The Winckley Square and Horrocks Quarter Opportunity areas provide 173 of the 415 dwellings proposed to be 'allocated' within the city centre. Standing at over 40% of the overall proposed housing allocations within the plan, this is a substantial element of the proposed allocations. Policy OP2 whilst identifying

residential development will be sought provides no clarity over the likely quantum. Policy OP5 only identifies that residential may be appropriate, therefore there is no certainty that a residential element will be provided. Clarity is therefore required over whether the housing identified within the two opportunity areas is indeed an allocation or a windfall allowance and in either case how the residential provision identified has been calculated. It remains unclear what evidence the identified housing numbers have been derived upon.

p) Are there any additional sites for housing in the city centre, e.g. on mixed use schemes, which could be identified and included in Policy SP4?

The HBF has no further comments at this stage.

MJ Good

Matthew Good

Planning Manager – Local Plans

Email: matthew.good@hbf.co.uk

Tel: 07972774229