

Gladman Developments Ltd

Ribble Valley Core Strategy

EiP Hearing Statement

Reserve Hearing Session – Further Written Representations

EiP Issues 3.5, 3.6 and 3.8



January 2014

1 INTRODUCTION

- 1.1. Gladman Developments (Gladman) participated in the Examination in Public (EiP) for the Ribble Valley Core Strategy on Tuesday and Wednesday, 14th and 15th January in relation to Examination Matters 1, 2 and 3.
- 1.2. This statement provides further written representations by Gladman in respect of Examination Issues 3.5, 3.6 and 3.8, deferred for consideration to the reserve Examination session on 22nd January. These written representations are submitted to the Examination in place of our participation at the reserve hearing session, which we are unable to attend. The submissions should be read in the context of our main EiP hearing statement.

Issue 3.5 - Is there a supply of specific deliverable sites sufficient to provide five years' worth of housing, with an additional buffer of 5% moved forward from later in the Plan period to provide choice?

Issue 3.6 - In the light of paragraph 47 of the NPPF, should the buffer be 20%? Are there sufficient deliverable sites to provide a 20% buffer?

- 4.1 Gladman maintain that the Council **cannot currently demonstrate a five-year housing land supply** against its proposed Core Strategy housing requirement of 250 dpa. As shown through the Council's October 2013 Housing Land Availability Schedule, at present there is a 4.34 year housing land supply in the borough. This under supply **will be further pronounced in the context of the Council's full, objectively assessed need of 280 dpa, with the Council only able to demonstrate a 3.75 year supply against this requirement.**

Table 1 Comparison of housing land supply scenarios as at 30th September 2013

	250 dpa	280 dpa
Claimed supply	1,930	1,930
Five year need	1,250	1,400
20% NPPF buffer	1,500	1,680
Completions April 2008 – 30 th September 2013	650	650
Shortfall April 2008 – 30 th September 2013	725	890
Total need	2,225	2,570
Total annualised need including buffer	445	514
Years supply	4.34	3.75

- 1.2 The Council's final November 2013 Strategic Housing Land Availability Assessment (SHLAA) states there are 6,294 dwellings in the five year supply. **However, it is not clear how many of these have a realistic prospect of coming forward within five years to contribute to the Council's deliverable supply.** With such a high potential supply of housing land identified through the SHLAA, this also raises the question **as to why the Council cannot deliver at least 280 dpa to reflect its full, objectively assessed needs.**
- 1.3 The Council correctly applies a 20% buffer to its five-year housing land supply calculation to reflect the persistent under-delivery of housing in the borough. The supply of housing in the borough has fallen short of the Council's proposed Core Strategy target of 250 dpa each year since 2008, the start of the proposed Plan period.

Issue 3.8 - Is there sufficient land available in the right places to deliver the level and spatial distribution of new homes planned for?

- 1.4 Gladman refers to Land at Whittingham Road, West of Longridge, when submitting that there is sufficient land available to meet Longridge's development needs and to support Ribble Valley's decision to direct development to this site. Land at Whittingham Road represents **the best opportunity to meet the future development needs of Longridge.** The site provides a **suitable, deliverable location for housing development** and could suitably accommodate 420 dwellings. **This should be reflected through the amount of development directed to the site through the Plan.**
- 1.5 Whilst supporting the principle of the Longridge adjustment and the vanguard example of the Duty to Cooperate that it represents, **Gladman question the re-apportionment of the 200 dwellings through the Longridge adjustment to 'Other Settlements' in the borough.** There is no evidence to suggest that these additional dwellings are required in these other and less sustainable settlements to meet their needs. It may be more appropriate **to provide these dwellings in the more sustainable settlements in the borough, including Longridge.**
- 1.6 The overall spatial distribution of housing in the borough should reflect the findings of the Council's evidence base and the principle of achieving sustainable development. In this regard **it is not clear how the Council has arrived at the apportionment of housing between the borough's settlements.** The amount of development apportioned to the 'Other Settlements' in particular does not appear to have been based on a robust assessment of their sustainability. **We submit that it may therefore be appropriate to direct additional growth to the borough's larger and key service centres, such as**

Longridge, which provides a highly sustainable location for further development. **The amount of development directed to Longridge should be viewed in the context of the Council’s full objectively assessed housing needs.**

- 1.7 **Gladman again question the reliance being placed on the Standen allocation in meeting the Council’s housing requirements.** Large strategic allocations such as this often require significant infrastructure and planning before housing can be delivered, whilst the capacity of the site may have been over-estimated. The Plan should therefore recognise the potential need to bring forward a range of smaller to medium scale housing sites, in the short to medium term, to ensure its borough’s housing needs are met, and to identify contingency sites for instances when sites do not come forward as planned.