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Turley

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CORE STRATEGY CONSULTATION
Council Offices,
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Dear Sir / Madam

RIBBLE VALLEY CORE STRATEGY PROPOSED MAIN MODIFICATIONS, MAY 2014

We are grateful for the opportunity to comment on the Council's Proposed Main Modifications to the Core Strategy on behalf of our client, Taylor Wimpey UK Limited. Our comments focus on four specific matters, as follows:

The overall housing provision (MM8; MM12; MM15; MM16)

Taylor Wimpey welcomes the proposed modification to increase the housing requirement from 5,000 to 5,600 over the plan period. As the Local Plan Inspector identified in his letter of 31 January 2014, the 5,000 figure was a 'hybrid' option which had no clear or fully objective analysis to validate it; would fall short of meeting needs; and was not a sound basis for the Plan.

It is therefore correct that an absolute minimum a requirement equivalent to 280dpa should be applied, to be more consistent with the Council's own evidence and to avoid clear disconnect between the economic and housing aspects of the Plan. But we do not consider this to be sufficiently aspirational / reflective of needs, as the NPPF requires.

The 280dpa (drawn from the Housing Requirement Update by NLP) figure is based upon the most recent economic forecasts born through a period of recession which should be viewed with considerable caution. The 1,600 new job forecast with which it aligns is derived from is a 'policy-off' forecast, and shown to be significantly below the employment growth forecast for the UK and the North West region (Employment Land Review 'ELR', para 9.14). By comparison, the 'Policy-on' Employment Based Forecast presented in the ELR, which takes in to account the significant growth potential of the Lancashire Enterprise Zone, forecasts an overall job growth of 4,900 (over three times the policy-off forecast).

Failing to recognise this clear potential for additional economic growth, and taking a 'neutral' economic line as a basis for the housing requirement, clearly fails the requirement to positively plan and for the Plan to be aspirational. The adverse implications of failing to positively plan for sufficient housing to meet economic growth potential are widely recognised and well rehearsed; the Plan as drafted runs considerable risk of causing such adverse consequences.

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One must also have reference to the Strategic Housing Market Assessment (SHMA). The SHMA, published in July 2013, addresses only affordable housing need, not need for private market housing for sale. As the anticipated cornerstone of evidence on housing need, as directed by the NPPF, the SHMA as drafted is considered deficient.

That said, it identifies a net need for 404 affordable properties per annum. Section 5 of the document considers other sources of supply, including subsidised private rent, and indicates a revised net need figure of 114dpa (although with a significant note of caution). It then goes on to identify in Section 6 that a split of 70% market and 30% affordable (comprising 6% shared ownership, 19% Affordable Rent and 5% new social rented dwellings) should be adopted. On this basis, the requirement for 114 affordable dwellings (as 30% of an overall requirement) would equate to an overall requirement of 380dpa. The setting of a requirement of 280dpa will fall significantly short of the level of provision required to deliver the identified affordable housing need.

Finally, there is the issue of backlog or unfulfilled need. The proposed amended figure of 280dpa, takes no account of the previous under-delivery against the former RS targets, which was an objectively assessed need. This is confirmed in paragraph 3.20 of the NLP report which states: 'It should be noted that the figures below do not include any allowance for backlog; nor do they seek to make a planning or policy judgement as to their suitability'. This unfulfilled need has to be added to the objectively assessed need identified for the Core Strategy.

Taylor Wimpey welcomes the increase but firmly considers that the proposed housing requirement remains insufficient and unsound. It does so by reference to the Council's own evidence of need and the fact that it would not satisfactorily align with the economic potential of the area.

The housing provision figure as an absolute figure rather than a minimum figure (MM12; MM13)

We would further challenge the removal of the words 'at least' from 'Key Statement H1: Housing Provision' and the removal of the words 'these figures will be treated as a minimum target unless otherwise determined' from paragraph 6.4.

The NPPF is clear that plans should be positively prepared (paragraphs 157; 183), should boost significantly the supply of housing (paragraph 47) and 'meets the full, objectively assessed needs for market and affordable housing in the housing market area...'

The stated housing requirement, to be consistent with the NPPF, must be treated as a minimum, not just a target, and the words 'at least' should be re-introduced, both for the overall requirement and the annual requirement. The text at paragraph 6.4 also needs to be reinstated.

Distribution / The Longridge Adjustment (MM8; MM15; MM16)

Taylor Wimpey supports the key role that Clitheroe, Whalley and Longridge should have in meeting the majority of the new development, reflecting their scale and role as key service centres within the Borough.

However, Taylor Wimpey objects to the specific proposed distribution of houses as set out at Paragraph 4.11 and Appendix 2 of the document as amended. It is not considered that this represents the most appropriate strategy, or one which is adequately evidenced.

Firstly, the quantum and proportion split between the principal settlements and the Other Settlements is not deemed to represent the most suitable and sustainable of alternatives, with the proportion assigned to the Other Settlements too high relative to the principal settlements.

The distribution to the principal settlements is predicated on there being an 'allocation' of 28.5% of 1,600 of the 5,600 dwelling overall housing figure to the Other Settlements. That is, the distribution amongst the principal settlements by percentage of existing 'main settlement population' is only undertaken once the set 28.5% of the overall requirement is assigned to lower order settlements. We note that this is an increased proportion (albeit marginal, but still important) than the original approach where 28% was attributed (1,120 of 4,000).

These settlements are recognised by the hierarchy (and supporting evidence) to be smaller, with fewer facilities and hence more constrained and less suitable (and sustainable) to accommodate growth than the principal settlements. Whilst this quantum does reflect this distinction to a degree (i.e. that the majority is directed to the principal settlements), this is a notable proportion. With the greater sustainable attributes (and development opportunities) of the principal settlements, a greater proportion should be directed to those settlements, alleviating pressure on the less sustainable lower order settlements. The focus in these areas should be on affordable and local needs.

Secondly, the 'adjustment' made for Longridge is entirely inappropriate and unjustified.

This serves to further unduly understate the role of Longridge, which elsewhere is recognised as a principal settlement to be a focus for growth. It reduces the quantum directed to Longridge, whilst exacerbating the issues above in relation to Other Settlements, which are recognised to be less sustainable than Longridge. Having established that 28.5% of the housing requirement is appropriate to be directed to the Other Settlements, which we would question, a further 200 units is simply moved from Longridge to add to that allowance – then equating to 32%.

The modifications reinforce rather than address this fundamental issue. Simply by providing clarity that the adjustment will be allocated to those 'more sustainable' other settlements, does not address the fact that Longridge is clearly more sustainable as a location than those the adjustment would be directed to. No evidence is presented as to why Longridge could not accommodate the additional 200 units, and why this would not be the most sustainable approach.

Housing Trajectory (MM48) / Non-inclusion of additional strategic sites

Notwithstanding our points in relation to the overall housing requirement, the housing trajectory proposed to be inserted at Section 15 is considered to be flawed, for the following reasons.

The SHLAA, which the trajectory draws from, presents no clear basis for its assumptions as to the lead in to the commencement of development nor the build rates that can realistically be achieved. The SHLAA simply assumes that all sites with planning permission (aside from the strategic sites at Barrow and Standen) will deliver in full during the first five years.

The trajectory assumes that the Standen and Barrow sites will deliver 100 dwellings per year. There is no evidential basis for this assumption, which is considered ambitious at best. We consider that a reasonable expectation of unfettered delivery rate would be, 50 - 60 units per annum, assuming a build rate of 25-30 units per developer outlet, and two outlets on each site, inclusive of affordable units.

In relation to Standen, it is also assumed that it will be fully developed within the Plan period. We are aware that the planning permission is presently subject to challenge and hence there must be significant doubt as to when (or if) delivery can commence. This also assumes that the significant infrastructure issues associated with a site of this scale and character are capable of being addressed in time to allow for unfettered release of development in response to the market. This represents a risk.

Taylor Wimpey supports the principle of the Standen site, but questions the reliance being placed on the site in the context of the need to positively plan and ensure a flexible and responsive planning system. There remains significant doubt as to the rate of delivery and whether the full allocated quantum can be delivered in the Plan period.

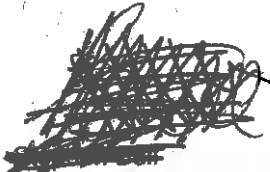
The Plan needs to include greater flexibility to ensure that the housing requirement can be delivered should the Standen site fail to deliver at the required rates. This flexibility should be in the form of additional sites and other monitoring / review mechanisms. As our representations to the Examination made clear, the need for certainty and clear direction is paramount, and the Core Strategy should seek to identify additional sites of strategic significance (i.e. crucial to delivery).

Included in this, given its position in the hierarchy, is the importance of allocating strategic housing site(s) for Longridge. This would provide essential, greater certainty that existing unfulfilled and future need for market and affordable housing can be met.

Taylor Wimpey proposes the strategic allocation of Land at Dilworth Lane, Longridge for residential development.

We trust these comments will be taken in to full account and subject to further consideration through the Examination of the Plan.

Yours Sincerely



Office Director

