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Gladman Developments Ltd

**Representations on
Housing and Economic Development DPD
Publication Version**



GLADMAN

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1 INTRODUCTION

- 1.1.1 These representations provide the response of Gladman Developments Ltd (hereafter referred to as “Gladman”) to the current consultation held by the Ribble Valley Borough Council (RVBC) on the publication version of the Housing and Economic Development – Development Plan Document (HEDDPD).
- 1.1.2 Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure. Gladman have previously made representations at an earlier stage of the consultation process into the HEDDPD. This response seeks to build upon those issues previously raised and contains brief comments on a number of issues which should be explored by RVBC prior to submitting the Plan for Independent Examination.
- 1.1.3 The National Planning Policy Framework (the Framework) sets out four tests that Local Plans must meet to be considered sound at Examination. The emerging HEDDPD will need to be tested at examination to ensure that it has been prepared in accordance with the Duty to Cooperate, legal and procedural requirement and to test whether it is sound. The four tests of soundness that the HEDDPD will be tested against are outlined as follows:
- Positively prepared,
 - Justified,
 - Effective; and
 - Consistent with national policy
- 1.1.4 Gladman request to be added to the consultation database and be kept informed regarding the progression of the HEDDPD and wish to participate at the hearing sessions at the Examination in Public.

2 HOUSING AND ECONOMIC DEVELOPMENT PLAN DOCUMENT

2.1 Context

2.1.1 Whilst it is noted that this consultation does not seek views on matters which are already agreed in the adopted Core Strategy, Gladman take this opportunity to discuss the following issues that the Council should consider prior to submitting the Plan for independent examination.

2.2 Allocations

2.2.1 Whilst Gladman does not wish to comment on the specific allocations proposed through the HEDDPD, it is a significant concern that the Council has only selected a small number of sites to meet the borough's housing needs.

2.2.2 Gladman consider that the Plan lacks the necessary flexibility and contingency should sites fail to come forward as anticipated. There should be a mechanism included in the Local Plan to allow consideration of other sustainable sites to come forward should the allocations identified in the Core Strategy and the HEDDPD fail to deliver in the timescales expected or fail to deliver the anticipated number of units to ensure that the Council can maintain a robust housing land supply. This could be effectively achieved through the allocation of additional housing land and/or the inclusion of an additional policy which follows the criteria established through the presumption in favour of sustainable development.

2.2.3 A similar approach was recently taken at the recent Scarborough Local Plan examination¹ where the following wording was agreed by the Inspector:

"Policy HC1

New opportunities for housing development will be encouraged across the Local Plan Area by:

- a. Making provision, during the Local Plan period, for the delivery of a minimum of 9,450 net additional dwellings through allocations identified under Policy HC2; New Housing Delivery and existing commitments as shown on the Policies Map; and
- b. Supporting the development of new housing within settlements where proposals are compatible with other policies in the local plan.

At any point in the Local plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites that would both make a positive contribution to the five year

¹ Scarborough Local Plan Appendix to Inspector's Report 9th February 2017 – Main Modifications

supply of housing land and be well related to the development limits of settlements of at least the Service Village classification as defined in Policy SH1 will be supported where these proposals comprise sustainable development and are consistent with relevant policies in the Local Plan.

Proposals that come forward under this mechanism will not be required to comply with Policy ENV6 but must be of a scale that both respects the physical size of the settlement it relates to and its position within the Settlement Hierarchy, as set out in Policy SH1.”

- 2.2.4 Gladman would urge the Council to consider a mechanism similar to that above to ensure that the HEDDPD allows for a degree of flexibility as there is no guarantee that the sites identified through the Core Strategy and the small number of allocations proposed through the HEDDPD will be delivered, as there may be situations when they are difficult to deliver which could result in the non-delivery of otherwise sustainable land for housing.

2.3 Housing Land Supply

- 2.3.1 Gladman note that the Council's latest Housing Land Availability Schedule published in October 2016 identifies a housing land supply of 5.32 years.

- 2.3.2 However, the approach advocated by the Council is not considered appropriate. The buffer should be applied to the annual requirement after the undersupply since the start of the plan period has been added. Indeed, this issue has been considered in a number of Local Plan Examinations. For example, Inspector Emerson who examined the West Oxfordshire Local Plan² drew the following conclusion on this specific issue:

“In passing, I would comment that the Council's calculation (HOU5, table 1) appears to apply the 5% buffer only to the normal annualised requirement and not to the shortfall. It should apply to both since the buffer is intended to boost supply and to give greater confidence that the overall housing requirement will be delivered”.

- 2.3.3 There are no exceptional circumstances why the position on this issue in Ribble Valley should be any different to that set out in PAS guidance or recent Local Plan Inspector's Reports.

2.4 Local Plan Review

- 2.4.1 Gladman note that the Council expect to undertake a review of the Local Plan by 2019 i.e. 5 years from the adoption of the Core Strategy. In light of the issues raised above, Gladman are concerned that the Council is not actively seeking to review its Local Plan, and would consider that such a review should be a priority for the Council. Although the Council's latest Local Development Scheme (LDS) suggests that the HEDDPD is expected to be adopted by September 2017, the timescales for plan preparation have already slipped by some 10 months. The review of the Local

² West Oxfordshire Local Plan Examination Document IN016

Plan is not even contained within the latest LDS, published in May 2016. There is a significant danger therefore that without prompt review the Local Plan could become out of date, resulting in problems in the housing market area.