

HBF



HED DPD PUBLICATION CONSULTATION

Forward Planning,
Regeneration and Housing,
Council Offices,
Church Walk,
Clitheroe,
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9th June 2017

Email: publicationreg19@ribblevalley.gov.uk

Sent by email only

Dear Sir / Madam,

Housing and Economic Development DPD: Publication

1. Thank you for consulting with the Home Builders Federation (HBF) on the Publication version of the Housing and Economic Development DPD.
2. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. **The HBF would like to participate in the examination hearing sessions to debate these matters further and discuss any further updates to the evidence base.**

Housing requirement

4. We agree that the level of housing set within the adopted Core Strategy together with the spatial distribution should provide the context for the Housing and Economic Development DPD (HED DPD). It should, however, be recognised that the Core Strategy housing requirement is identified as a minimum and not a maximum. It is, therefore, appropriate for this plan to provide an element of provision over and above the stated housing requirement to ensure it is met as a minimum.

Housing Allocation Policy (Policy HAL)

The HBF considers the policy unsound as it is not effective or positively prepared.

5. The consultation document identifies just two additional sites at Mellor and Wilpshire. This is to make up the residual housing requirements identified in the Core Strategy of 17 and 34 dwellings respectively (HED DPD, page 8). It is noted that the residual requirement for 25 dwellings at Longridge has been fulfilled via a

recent planning approval. The HBF does not wish to comment upon the appropriateness of the proposed allocations.

6. Our principal concern with the HED DPD is the lack of flexibility provided in terms of meeting the minimum Core Strategy housing requirement of 5,600 over the plan period. The October 2016 Housing Land Availability Schedule (2016 HLAS) identifies that as of 30 September 2016 a total of 1,549 dwellings had been completed. This stands 831 dwellings short of the average net requirement for 280dpa. Whilst it is noted that levels of development have increased over recent years this is a significant undersupply. Further allocations would assist in reducing this under-supply.
7. The table at page 4 of the 2016 HLAS indicates a supply of 4,224 dwellings. This supply comprises a significant number of sources where development is yet to commence on site (3,002 dwellings). Once the supply is added to the completions a small buffer of just 173 dwellings is provided (3% above the Core Strategy requirement). Once the allocations within the HED DPD and the additional permission at Longridge are added the buffer rises to 250 dwellings or slightly over 4% above the Core Strategy requirement.
8. Whilst the HBF is supportive of the Council providing a buffer of dwellings over and above the Core Strategy requirement the size of the buffer is not considered adequate to deal with any none or under-delivery from allocations or sites with planning permission over the plan period. This point was made in our previous comments upon the HED DPD.
9. The HBF notes paragraphs 3.4 to 3.6 of the 6th April 2016 *Report to Planning and Development Committee*. In response to the points raised within report we would point out that whilst the Local Plan Expert Group¹ recommendations to Government upon the need for a 20% buffer are not explicitly referenced in the Government's Housing White Paper² it does suggest that a delivery test against the housing requirement will be placed upon local planning authorities. It is therefore clear that Government wish to ensure that plans deliver their housing requirement as a minimum. It is therefore considered prudent to include a buffer due to the inherent uncertainties in delivery over the plan period. Furthermore the NPPF is clear that plans should provide flexibility and choice as well as being able to rapidly respond to changing circumstances. A buffer of sites would provide such flexibility.

¹ Local Plan Expert Group (2016): Report to the Communities Secretary and to the Minister of Housing and Planning

² DCLG 2017: Fixing our broken housing market

10. The HBF therefore re-iterates its view from the previous consultation that given the recent history of under-delivery within Ribble Valley³ a 20% buffer of sites should be provided. This buffer of sites should be available from the outset of the plan.
11. The HBF also queries whether the Council can adequately demonstrate a five year supply of housing land as required by the NPPF. Whilst the HBF has not undertaken a thorough assessment of all the sites and delivery rates contained in the supply, the calculation of the five year supply requirement (page 10, 2016 HLAS) is considered flawed. This is because the undersupply is added after the buffer.
12. It is noted that the Council is seeking to rectify this issue (paragraph 3.7 the 6th April 2016 Report to Planning and Development Committee). The HBF supports this proposed change. However, based upon the position as of 1st October 2016 the Council would not have a five year supply upon adoption of the HED DPD. Paragraph 3.9 of the 6th April Committee Report addresses this point noting that since October 2016 the Council has resolved to approve additional land for housing, including 275 dwellings at Longridge and as such will be able to identify a five year supply. This will need to be verified by an update to the Council's five year supply position. The HBF will review our position once this additional information is provided.
13. To ensure that the plan provides sufficient flexibility to meet the housing requirement over the plan period, in full, and provides a defensible five year housing land supply position upon adoption it is recommended further sources of supply are considered.

Information

14. The HBF would like to be kept informed of the progress of this document. In particular we would like to be made aware of the following;
 - Submission of the plan for examination;
 - The publication of the examiner's recommendations and any publicly available correspondence regarding the plan; and the
 - Adoption of the plan

³ Ribble Valley BC (2015): Housing Land Availability Schedule, paragraph 2.

15. We would be happy to discuss these comments further if required. The HBF wish to be kept informed of future consultations upon the Local Plan or other planning documents.

Yours sincerely,

