

Response to Inspector's main issues and questions re RVBC HEDDPD EiP

Hearing Statement on behalf of Frank Duffin

We act on behalf of Frank Duffin and have made written representations to this HEDDPD process. Those written comments still stand. This statement responds to the issues and questions raised by the Inspector.

Issue 2 question a)

Is the amount of land allocated for housing sufficient to meet the CS requirements?

No. It needs to be more flexible to cope with changing circumstances and allow for any under delivery to be addressed easily. Whilst reference in the CS is made to the 5600 being minima in reality it is not being applied in that way.

The principle and Tier 1 settlements should be considered for further site allocations and those allocations should include for affordable homes and homes for the 55+ age group which RVBC have identified as a group of specific need as the borough has a significant number of older people.

Issue 2 question b)

Is there a housing trajectory for the delivery of housing on the strategic site and the principal settlements? 1040 dwellings are identified for Standen over the plan period where will the remainder of the housing requirement be provided?

No. On p178 of the CS there is a trajectory which is out of date and has not been achieved. With shortfalls on the predicted 400dpa in each of the last 3 years. It also assumes delivery of 100 units each at Barrow and Standen for 2016/17 which has not happened. Furthermore, the Core Strategy states that the housing trajectory will be reviewed and updated on a regular basis. As yet this has not happened. If the Council produce one and that information be forthcoming in their responses to the Inspector's questions which they are due to submit the week after all other parties must respond, then we reserve the right to add further to our replies.

At the CS EiP the Council frequently referred to the Site Allocations document as being the how they would identify future sites.

Issue 2 question c)

Will the distribution, capacity and speed of deliverability (with regard to viability and infrastructure) of the sites, including those allocated in the DPD and the Standen strategic site, satisfy the provision of a 5 year housing land supply?

No. There has been persistent under delivery from 2008-14 and that backlog still exists. Even though higher levels of delivery have occurred 2015-17, these are not enough. The result is the Council continue to be behind on their targets. They need to allocate further sites to give the flexibility to ensure delivery and to add an additional 20% buffer to create
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that. They have also significantly over estimated on build out rates as well as the timescale for the start of the delivery on the larger sites. The fact that larger sites take longer to deliver was put to the CS EIP, so it is something the Council are aware of. This is an issue that will arise again with delivery of proposed site HAL2. Also, as was commented on at the CS EIP a wider range of sites and site sizes are necessary to give flexibility and ensure deliverability.

Issue 2 question e)

Are Housing Allocation Policies HAL1 and HAL2 clear on what will and will not be permitted – for example housing numbers, tenure mix?

No. The DPD provides no such information. Housing Allocation Policy (HAL) in its wording of the 'Justification' section rather seems to reaffirm the fact that the 5600 dwellings over the CS and 280dpa are being interpreted by RVBC as absolutes not minima.

Regarding HAL1 no actual numbers for the site are identified just a comment that the site would be very high density or implication it maybe too small and it implies the likelihood is other land in Mellor will be needed to meet the 18 unit target. There is no detail of dwelling type, or tenure mix other than to include some affordable and be in line with CS policies H3 and DMH1.

For HAL2 various site constraints are listed but no other detail is provided in regard to house types, mix, tenure, affordability, phasing of the scheme, how and when the various site constraints will be addressed, likely lead in times or build out rates and when these might first be included in the delivery. Given the amount of work required to get to an application and then implementation this site is unlikely to come forward quickly, yet the 32 units in Wilpshire is a current requirement. At Reg 18 stage as 'Wilpshire 3', now called HAL2 could accommodate 227 units yet Wilpshire only has a requirement for 34 units which has now reduced to 32 units, as 2 dwellings have since been built on windfall sites.

Issue 2 question f)

Is the proposed monitoring likely to be adequate and what steps will be taken if sites do not come forward?

No specific information has yet been provided by RVBC on this. Should that information be forthcoming in their responses to the Inspector's questions which they are due to submit the week after all other parties have to respond then we reserve the right to add further to our replies.

On the information that has been publicly available i.e. the 6 monthly HLS updates. These have shown no significant level of delivery and generally there is been persistent under delivery in RVBC.

There is no flexibility and no alternatives if these sites are either delayed or do not come forward other than through the application and appeal process.

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