

RESPONSE OF THE HOME BUILDERS FEDERATION (HBF)

Issue 2: Housing - whether the Council's strategy for meeting its housing requirement is sound and whether the housing policies of the DPD are consistent with, and positively promote, the visions, objectives and spatial policies contained in Core Strategy?

Questions:

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

The principal concern of the HBF with the DPD remains the lack of flexibility provided in terms of meeting the minimum Core Strategy housing requirement of 5,600 over the plan period.

The following tables are completed using data extracted from the Housing Land Availability Schedule April 2017.

Table 1: Completions [UPDATED]			
Year	Completions	Core Strategy Figure	Over / Under Supply
08/09	75	280	-205
09/10	89	280	-191
10/11	69	280	-211
11/12	147	280	-133
12/13	172	280	-108
13/14	183	280	-97
14/15	345	280	65
15/16	300	280	20
16/17	390	280	110
17/18	400	280	120
Total	2,170	2,800	-630
1 Apr 18 to 30 Sep	192	140	52
Total	2,362	2,940	-578

Table 2: Total Supply [UPDATED TO 30 SEPT 18]		
Sites not started		
		5-Year Supply
Sites subject to S106	0	0
Full planning permission	765 ¹	763
Outline planning permission	1,550 ²	1,482
Conversions (not started)	80	80
Sub-Total	2,395	2,325
10% Slippage	240	233
Total	2,155	2,092

¹ It is noted that the 5-year supply document contains two less dwellings on small sites due to a response in relation to 55 Pendle Road, Clitheroe

² It is noted that the 5-year supply document contains 68 less dwellings with outline permission

Sites under construction		
Started sites	899	1,427
Sites under construction	531	
Conversions (started)	³ 76	69
Total	1,506	1,496
Supply Total	3,661	3,588
Additional Contributions		
Sites allocated in Reg 19 HED DPD to meet residual requirements	32 ⁴	32
Further Site Allocations from the Proposed Main Modifications	190	190
Plus windfall allowance	115	
Total	337	222
Total Supply		
Sites not started + Sites under construction + Additional Contributions	3,998	3,810

Table 3: Housing Requirement	
Core Strategy housing figure	5,600
Completions	2,362
Total Supply	3,998
Remaining / Additional Supply	760
20% Buffer 5,600	1,120
20% Buffer remaining Housing Requirement 3,238	648

Table 1 clearly shows that there has been an undersupply of dwellings, whilst it is noted that levels of development have increased over recent years, 578 dwellings is a significant undersupply. Further allocations would assist in reducing this under-supply. The HBF recommends that this under-supply is addressed as soon as possible.

Page 4 of the Housing Land Availability Schedule Sept 2018 identifies a supply of 3,901 dwellings. This supply comprises a significant number of sources where development is yet to commence on site (2,395 dwellings). The HBF recommends that a 10% slippage rate is used when looking at sites that have not started, similar to that applied to the 5-year housing supply, to allow for non-implementation of permission.

The Sept 2018 document has updated the position from the previous 2017 documents, and now appear to show that the Council has sufficient housing to meet the identified housing requirement, with a level of additional buffer. This differs from the submitted evidence, from the Housing Land Availability Schedule April 2017, the Core Strategy and the Housing and Economic Development DPD, where it was not

³ The 5-year supply document removes 7 dwellings from the supply

⁴ HAL1 no longer expected to be delivered.

apparent that sufficient housing had been identified to meet the requirement set out in the Core Strategy.

It is important that the plan should seek not only to provide sufficient development opportunities to meet the housing requirement but also to provide a buffer over and above this requirement. The reasons for the inclusion of such a buffer are two-fold. Firstly, the NPPF is clear that plans should be positively prepared, aspirational and significantly boost housing supply. In this regard the housing requirements set within the plan should be viewed as a minimum requirement, this interpretation is consistent with numerous inspectors' decisions following local plan examination. Therefore, if the plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites are required to enable the plan requirements to be surpassed. Secondly, to provide flexibility. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement.

The HBF has previously highlighted that they do not believe the supply is 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, and this lack of flexibility appears to be being demonstrated through the current evidence.

The HBF therefore re-iterates its view from the previous consultation that given the recent history of under-delivery within Ribble Valley a 20% buffer of sites should be provided. This buffer of sites should be available from the outset of the plan.

Table 4: 5-Year Supply	
Sites not started	
Sites subject to S106	0
Full planning permission	558
Outline planning permission	496
Conversions (not started)	80
Sub-Total	1,134
10% Slippage	-113
Total	1,021
Sites under construction	
Started sites & Sites Under Construction	1,262
Conversions (started)	69
Total	1,331
Additional Contributions	
Plus windfall allowance (26 x 3)	78
Total	78
Total Supply	
Sites not started + Sites under construction + Additional Contributions	⁵ 2,430

⁵ =2,543 if don't include the 10% slippage

Table 6: Five Year Supply			
		20% Buffer (Recommended by HBF)	5% Buffer (Used in Housing Land Availability Schedule)
A	Core Strategy Housing Requirement for Plan Period (2008-2028)	5,600	5,600
B	Core Strategy annual housing rate (A/20 years)	280	280
C	Five Year housing rate (B X 5)	1,400	1,400
D			
D	Actual Completions (2008/09 to 30 Sep 2018)	2,362	2,362
E	Core Strategy expected Completions (B x 9) (280 x 10.5)	2,940	2,940
F	Over / Under Supply of housing delivery (D-E) (2,362-2,940)	-578	-578
G	Five Year housing rate incorporating shortfall (C+(-)F)	1,978	1,978
H			
H	Buffer	395.6	98.9
I	Five Year housing rate incorporating shortfall and buffer	2,373.6	2,076.9
J	Annual target for next 5 years	474.7	415.4
K			
K	Deliverable Supply	2,430	2,430
L	Housing Land Supply	5.12 years	5.85 years
K			
K	Deliverable Supply	2,543	2,543
L	Housing Land Supply	5.36 years	6.12 years

The NPPF (2012 & 2018)⁶ is clear that where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. From the evidence provided in Table 1 it is clear there has been persistent under delivery with an undersupply of 578 dwellings over the plan period so far. Therefore, the HBF recommends the use of the 20% buffer, as part of the 5-year housing supply calculation.

Although the calculation above identifies that both the 5% and 20% buffer provide a 5-year supply in both cases it is by a narrow margin. And whilst the HBF has not undertaken a thorough assessment of all the sites and delivery rates contained in the supply. It would only take one or two sites not too deliver for the supply to be lost. To ensure that the plan provides sufficient flexibility to meet the housing requirement

⁶ Although NPPF 2018 now brings in the HDT, it is agreed that Ribble Valley are only likely to need 5% based on NPPF 2018 and HDT definition.

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.

Whilst it is accepted that the Local Plan will be tested against the NPPF (2012), in reality as soon as the document is adopted it will be used alongside the NPPF (2018), which will set a much higher bar for the deliverability of sites. NPPF (2018) states that *'Sites that are not major development⁷, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years'*.

It is noted that some evidence is provided in the HLAS 5-year Supply Evidence of Delivery (Sept 2018) however, it is noted that not all the sites have additional evidence, some for example are just appeal decisions e.g. EV22 or the Decision Notice e.g. EV23. This obviously immediately brings into question a number of the sites, and the potential impact this could have on the 5-year supply.

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?

Considering the housing trajectory within the Core Strategy it is clear that development has not been delivered at the rates expected. This hints at the need for increased flexibility within the plan, and the need to identify further sites, to ensure that the same does not happen in relation to the new trajectory.

The Housing Position Paper December 2018 provides a new trajectory and a table setting out the proposed number of completions over the plan period. This is considered an improvement. The HBF would recommend that the Council continues to work with the developers of the sites to ensure that they deliver to the trajectories proposed, and seek to take action where appropriate to ensure that homes are delivered.

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?

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

⁷ Defined in the NPPF (2018) as *'development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more'*.

The vulnerability of the 5-year supply is highlighted by the HBF in response to question 2 (b) above.

The HBF recommends that the plan includes greater flexibility to ensure that the housing requirement can be delivered should the sites allocated in the DPD fail to deliver at the required rates. This flexibility should be in the form of additional sites or safeguarded land which could be released as part of a full or partial plan review.

d) Does the plan make provision for addressing inclusive design and accessible environments issues in accordance with paragraphs 57, 58, 61 and 69 of NPPF?

The HBF has no comments upon this issue.

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

The HBF does not wish to comment upon individual sites.

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

Justification to the Housing Allocations Policy states that a monitoring report will be the key tool in tracking the five-year rolling land supply. It goes on to state that where a shortfall of deliverable housing land is identified the Council considers that there is sufficient provision within the existing policy framework of the Core Strategy to bring forward additional suitable sites. Whilst Policy H1 of the Core Strategy states that the overall housing requirement will be subject to a formal review within five-years from the date of adoption of the Core Strategy.

It is not clear from the monitoring table in the Core Strategy or the text in the Housing and Economic Development DPD what will happen if housing is not delivered or there is no longer a five-year supply. There needs to be more detail in relation to how more housing will be delivered, more information needs to be given as to when action will be taken, what that action will be and to what timescales. The HBF is not clear as to how long it will be before the final resort of reviewing the plan is considered. The HBF recommends that specific monitoring triggers are introduced. Such triggers could include, but not be restricted to; persistent failure to meet its housing requirement, lack of a five year housing supply, and additional household growth information identifying an increased need for new housing.

The HBF again recommends that more sites should be allocated and greater flexibility built into the housing supply in the plan, this would provide more certainty and clarity, and reduce the risk of not meeting the housing target.