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Dear Michelle Haworth,

**RIBBLE VALLEY HOUSING AND ECONOMIC DEVELOPMENT DPD:  
INSPECTOR'S MAIN ISSUES AND QUESTIONS**

Thank you for consulting with the Home Builders Federation on the Ribble Valley Housing and Economic Development DPD.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following comments upon selected questions posed within the Inspector's Main Issues and Questions.

Yours sincerely,



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## RESPONSE OF THE HOME BUILDERS FEDERATION (HBF)

***Issue 1: Legal compliance - has consultation been carried out in accordance with the Statement of Community Involvement and the relevant Regulations; has the DPD been subject to sustainability appraisal; has a Habitats Regulation Screening Report been carried out and has the duty to cooperate been met?***

### ***Questions:***

***a) Has the Plan been prepared in accordance with relevant legal requirements, including the Duty to Co-operate and the procedural requirements of the National Planning Policy Framework?***

A Duty to Cooperate Statement does not appear to have been produced at this time to support the Housing and Economic Development DPD. Therefore, the HBF has some concerns in relation to the compliance with the Duty to Cooperate. It is also noted that the compliance with the duty needs to go beyond merely consulting with neighbouring authorities, but rather it should implement actions and have evidence of high level agreements to tackle strategic issues, including meeting the housing needs of the wider market area.

***b) Is the Plan in general conformity with the National Planning Policy Framework? Does it reflect the National Planning Policy Framework's presumption in favour of sustainable development?***

The HBF has concerns that the Housing and Economic Development DPD does not reflect the National Planning Policy Framework's presumption in favour of sustainable development, particularly in relation to providing sufficient flexibility to adapt to rapid change.

The HBF recommends that the plan includes greater flexibility to ensure that the housing requirement can be delivered. 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.

***c) Is the Plan consistent with the Core Strategy and is it capable of meeting its objectives?***

One of the objectives of the Core Strategy is 'to increase the supply of affordable and decent homes in the borough to help meet identified needs'. The HBF does have concerns that this objective will not be met based on the current content of the Housing and Economic Development DPD.

***d) Are appropriate arrangements in place to ensure proper monitoring of the Plan?***

The Housing and Economic Development DPD suggests that a monitoring report will be used to ensure the Council maintains a five-year land supply. It goes on to state that if there are issues with delivery dwellings the Council considers that there is sufficient provision within the existing policy framework of the Core Strategy to bring forward additional suitable sites.

There is a short section of the DPD on the monitoring of the site allocations, and there is a monitoring table within the Core Strategy. The HBF considers 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.

***e) How have the Housing Needs Assessment and Economic Strategy which formed part of the Core Strategy evidence base informed this DPD?***

The HBF do not wish to comment on this question.

## 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.

<b>Table 1: Completions</b>			
<b>Year</b>	<b>Completions</b>	<b>Core Strategy Figure</b>	<b>Over / Under Supply</b>
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
<b>Total</b>	<b>1,770</b>	<b>2,520</b>	<b>-750</b>

<b>Table 2: Total Supply</b>	
<b>Sites not started</b>	
Sites subject to S106	92
Full planning permission	534
Outline planning permission	1,477
Conversions (not started)	88
Affordable housing (not started)	799
<b>Sub-Total</b>	<b>2,990</b>
10% Slippage	299
<b>Total</b>	<b>2,691</b>
<b>Sites under construction</b>	
Started sites	625
Sites under construction	395
Conversions (started)	80
<b>Total</b>	<b>831</b>
<b>Additional Contributions</b>	

Sites allocated in Reg 19 HED DPD to meet residual requirements	50
Plus windfall allowance	115
<b>Total</b>	<b>165</b>
<b>Total Supply</b>	
Sites not started + Sites under construction + Additional Contributions	<b>3,687</b>

<b>Table 3: Housing Requirement</b>	
Core Strategy housing figure	5,600
Completions	1,770
Total Supply	3,687
<b>Remaining</b>	<b>143</b>

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, 750 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 April 2017 identifies a supply of 3,998 dwellings. This supply comprises a significant number of sources where development is yet to commence on site (2,990 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.

From the evidence available to the HBF from the Housing Land Availability Schedule April 2017, the Core Strategy and the Housing and Economic Development DPD it is not apparent that sufficient housing has 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.

<b>Table 4: 5-Year Supply</b>	
<b>Sites not started</b>	
Sites subject to S106	92
Full planning permission	534
Outline planning permission	1,477
Conversions (not started)	88
Affordable housing (not started)	799
<b>Sub-Total</b>	<b>2,990</b>
Less dwellings on site not deliverable	0
Less dwellings on large sites deliverable beyond the 5-year period	-1,221
<b>Sub-Total</b>	<b>1,769</b>
10% Slippage	-177
<b>Total</b>	<b>1,592</b>
<b>Sites under construction</b>	
Started sites	625
Sites under construction	395
Conversions (started)	80
<b>Sub-Total</b>	<b>1,100</b>
Less sites not currently active	-26
Less dwellings on large sites deliverable beyond 5-year period	-243
<b>Total</b>	<b>831</b>
<b>Additional Contributions</b>	
Sites allocated in Reg 19 HED DPD to meet residual requirements	50
Plus windfall allowance	115
<b>Total</b>	<b>165</b>
<b>Total Supply</b>	
Sites not started + Sites under construction + Additional Contributions	<b>2,588</b>

<b>Table 6: Five Year Supply</b>			
		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	Actual Completions (2008/09 to 2016/17)	1,770	1,770
E	Core Strategy expected Completions (B x 9) (280 x 9)	2,520	2,520
F	Over / Under Supply of housing delivery (D-E) (2520-1770)	-750	-750
G	Five Year housing rate incorporating shortfall (C+(-)F)	2,150	2,150
H	Buffer	430	108
I	Five Year housing rate incorporating shortfall and buffer	2,580	2,258
J	Annual target for next 5 years	516	452
K	Deliverable Supply	2,588	2,588
L	<b>Housing Land Supply</b>	<b>5.02 years</b>	<b>5.73 years</b>

The NPPF 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 750 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 to deliver for the supply to be lost (8 dwellings for the 20% buffer, and 30 dwellings for the 5% buffer). 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.

***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?***

The HBF have not found a housing trajectory to support the Housing and Economic Development DPD. But considering the housing trajectory within the Core Strategy it is clear that development has not been delivered at the rates expected. This again

hints at the need for increased flexibility within the plan, and the need to identify further sites.

***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.

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 Standen site or 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 states 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.