

# RIBBLE VALLEY BOROUGH COUNCIL REPORT TO PLANNING & DEVELOPMENT COMMITTEE

Agenda Item No.

meeting date: 2 FEBRUARY 2012  
title: CORE STRATEGY – HOUSING REQUIREMENTS  
submitted by: CHIEF EXECUTIVE  
principal author: COLIN HIRST – HEAD OF REGENERATION & HOUSING

## 1 PURPOSE

1.1 To consider and agree the strategic housing requirement for Ribble Valley.

1.2 Relevance to the Council's ambitions and priorities:

- Council Ambitions – To match the supply of homes in our area with identified housing needs and to progress the Core Strategy. The Core Strategy is a central Strategy of the Local Development Framework. It will help in the delivery of housing, employment and the protection and enhancement of the environment, ultimately presenting the Delivery Strategy for implementing the vision for the Ribble Valley for the next 15-20 years.
- Community Objectives – As a tool for delivering Spatial Policy the Core Strategy identifies how a range of issues relating to the objectives of a sustainable economy, thriving market towns and housing provision will be addressed through the planning system.
- Corporate Priorities – The Core Strategy is the central document of the LDF. The housing requirement is fundamental to determining planning applications and for the purposes of formulating planning policy.
- Other Considerations – The Council has a duty to prepare Spatial Policy under the Local Development Framework system.

## 2 BACKGROUND

2.1 As Members are aware the provision of housing is a key element of the Council's land-use planning and its role in determining planning applications. As an issue, it generates without doubt high levels of interest and concerns amongst the local community, as demonstrated in recent Core Strategy consultations. Housing provision brings great pressure from landowners and developers; it plays a key economic role, has a role in delivering sustainable mixed communities; regeneration benefits and opportunities to deliver both affordable and a choice of houses (and location) to meet people's aspirations. Establishing the appropriate working requirement is essential.

2.2 Previously, strategic planning for housing requirements has been delivered in a top down approach, formerly through the County Structure plans and more recently by way of Regionally set requirements in the Regional Spatial Strategy (RSS). District Authorities as consultees in the statutory planning process have had the opportunity to contribute to establishing housing requirements. However, the removal of the regional

tier puts the responsibility of establishing housing requirements with district planning authorities.

- 2.3 The Council needs to establish the housing requirement to inform decisions. It is not an option for the Council not to put in place a requirement. This would lead to decisions being taken out of the hands of the Council and would not allow the Council to fulfil its statutory duties and requirements as Local Planning Authority. The housing figure will be finalised as part of the work of preparing the Core Strategy with the proposed figure, incorporated into the Strategy and subject to the statutory Local Development Framework process. It will be subject to periods of statutory consultation, be capable of (and most likely will be) the subject of scrutiny by an Independent Inspector through the Examination in Public for the Core Strategy before it is formally adopted as part of the Strategic Planning Policy for the Borough.
- 2.4 Whilst the figure for housing is being established there will still need to be a recognised benchmark against which decisions can be made, which at present would be best served by continuing the application of the current RSS requirement. Already adopted by the Council for operational purposes.

### 3 GOVERNMENT GUIDANCE AND POLICY

- 3.1 In considering the housing requirement it is important to take into account Government guidance on the issues and to be aware of the framework within which the Council needs to address this matter. Current guidance is contained within Planning Policy Statement 1 – Sustainable Development, Planning Policy Statement 3 – Housing and Planning Policy Statement 12 – Local Spatial Planning. In addition the Council will need to be mindful of the emerging National Planning Policy Framework (NPPF) that has recently been the subject of consultation and is anticipated to be put in place later this year. Any changes of significance that the NPPF introduces will need to be taken into account at the relevant time. Whilst it is not known what the published version will contain our approach should be measured against it.
- 3.2 Guidance in PPS1, promotes a number of general themes including as a general approach the role of planning authorities in bringing forward sufficient land of a suitable quality and in suitable locations to meet expected need. In doing so it is necessary to ensure that plans and policies are properly based on the analysis of evidence. It is also expected that in support of sustainable economic development, plans will ensure the provision of sufficient, good quality new homes (including an appropriate mix of housing and adequate levels of affordable housing) and that overall this is within a principle of an integrated approach to sustainable development, including the opportunity for communities to be involved in the drawing of the vision, strategy and specific plan policies. The approach taken by the Council is consistent with this policy statement.
- 3.3 Planning Policy Statement 3 – Housing, establishes the national position in relation to both strategic housing policy objectives and planning for housing policy objectives. These objectives are set out at Appendix 1. The use of an evidence based policy approach to inform housing need and demand and deliver these objectives is critical. Information contained in the Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA) are seen as important. PPS3 gives guidance specifically upon assessing an appropriate level of housing wherein it is emphasised that a strategic approach should be taken, be evidence-based through for

example the preparation of the SHMA, reference and understanding of long-term housing market prices, affordability levels, and Government household projections. The Council has in conjunction with our consultants created a relevant evidence base.

- 3.4 Guidance within PPS12 – Local Spatial Planning underpins the process and the consideration to be given in preparing the Local Development Framework and in particular the Core Strategy. A fundamental element of delivering the Core Strategy is to identify the overall amount of housing required in an area, a role which has been placed in the remit of the Local Authority with the Coalition Government’s intention to remove the regional tier of strategic planning. Defining the housing requirement will enable the Core Strategy to deliver housing policy objectives: reflect the vision for the area that has been drawn up for the Core Strategy to reflect also the vision and aspirations set out in the adopted Sustainable Community Strategy. The Core Strategy vision is set out at Appendix 2. Again the guidance reiterates that the Core Strategy needs to be justified being founded upon a robust and credible evidence base bringing together two elements, namely, the evidence of the views of the local community and others who have a stake in the future of the area (including landowners and developers) and the evidence provided by research and facts supporting the choices being made. Ultimately the Council’s approach will be tested at the Examination in Public where the Inspector will consider, in the terms of the national policies whether the Core Strategy is sound.
- 3.5 Members will also be aware of the recently published draft National Planning Policy Framework (NPPF). This has been the subject of consultation and the final version is yet to be published, however it is anticipated before the 31 March 2012. Any significant implications for the housing requirement arising from the publication of the NPPF will need to be taken into account accordingly. The draft NPPF presented a very clear intention of Government to promote development activity that supported economic growth and in particular increased housing delivery. Indeed some of the most controversial elements that generated high levels of response and concern to the consultation related to the proposed presumption in favour of development and the assumption given that the default answer to development proposals was to be “yes” except where it would compromise key sustainable development principles.
- 3.6 It is reiterated in the draft document that plans should set out the strategic priorities for the area including strategic policies to deliver housing and economic development requirements, as well as the protection and enhancement of the natural and historic environment. Delivering policies that genuinely deliver these two competing strands is a challenge yet a fundamental role for the Local Planning Authority that is expected by the national policy. In relation to the issue of housing requirements the draft NPPF continues to emphasise the themes of the existing Planning Policy Statements referred to above. That is, the use of an appropriate evidence base, with relevant up to date information (that is available to the Council) about the economic, social and environmental characteristics and prospects for the area as well as account being taken of relevant market and economic indicators such as land prices and demand. The NPPF places a strong emphasis upon the use of SHMA (Strategic Housing Market Assessment) and SHLAA (Strategic Housing Land Available Assessment) in providing an understanding of housing requirements in the area and effectively the deliverability of those requirements.
- 3.7 A further important element of national policy that is identified in the draft NPPF and is a key component of the Localism Act is the ability for local communities through the

neighbourhood planning mechanism to facilitate additional development that is supported by the local community. This introduces additional flexibility to enable more housing to be brought forward where it is agreed to be appropriate.

- 3.8 In both existing guidance and the draft NPPF it is anticipated that Local Planning Authorities will have plans in place that look forward over at least a 15 year period, but that it needs to be recognised that the system has to allow enough flexibility for changing circumstances or indeed new evidence to be taken into account. What is also important is that in establishing a housing requirement, the proposed figure would not be treated as an absolute figure. Plans through their policies will enable relevant flexibilities where appropriate and providing the underlying vision, objectives and strategy is not fundamentally undermined. It is clear from the proposals in the draft NPPF and the Localism agenda that flexibility is intended in the planning system.
- 3.9 Similarly, a vital element that has to be taken into account to reflect national policies is that of infrastructure (in its broadest terms) that will be needed to support identified development and having a planned level of development against which providers and organisations responsible for its delivery can plan will be vital. The housing requirement is key to this, following which the necessary spatial distribution and delivery of services can be dealt with through the wider Core Strategy process.

#### 4 THE COUNCIL'S APPROACH TO ESTABLISHING A HOUSING FIGURE

- 4.1 The Council recognised the implications of the Coalition Government's policy approach and the anticipated revocation of regional strategy based targets meaning that a locally derived figure would need to be in place. Whilst the initial response was to confirm the continued application of the RSS figure for both plan-making and at that time perhaps more critically deciding planning applications, two factors had to be acknowledged. Firstly it would be a matter of a relatively short timescale before the Localism Act formally removed the RSS (which is now imminent) and secondly, in any event whilst the RSS was acknowledged by Government as being based on the most up to date evidence, the RSS reviews of housing requirements having been stopped, the adopted figure only covered the period up to 2021. The Council's Core Strategy would therefore extend beyond this to 2028 leaving a period against which a figure needed to be determined. It should also be noticed that in any event it is a requirement of established Government guidance to plan for at least a 15 year period beyond the adoption date of the Core Strategy requiring an evidence based figure to be in place. With adoption anticipated in 2012, the 15 year period would also extend beyond the existing RSS figure. Consequently it was acknowledged that a housing requirement review is necessary at the local level.
- 4.2 The Council commissioned specialist advice from Nathaniel Litchfield & Partners who provided the Council with their report and advice. The report to the Planning and Development Committee meeting of the 11 August 2011 refers, Members should bring their copy of that report to the meeting for reference as it includes the consultant's report. The consultant's report draws on the modelling scenarios agreed by Members, takes account of relevant data and information available and concludes with the suggested range within which the consultants would anticipate a housing requirement to fall based on the modelling. The study and modelling undertaken for the Council by the consultants represent a key component of our evidence against which requirements can be set.

4.3 The consultant's have drawn a number of key conclusions that need to be taken into account in agreeing a housing requirement for the borough. These are set out below as an extract from the report:

1. *Taking into account the scenarios tested and the Core constraint on development delivery as shown by current evidence, it is NLP's view that the dwelling requirement for Ribble Valley borough should be in the range of 190 to 220 dwellings per annum between 2008 and 2028.*
2. *This figure is lower than the latest CLG household projections and particularly the employment led growth forecasts, to reflect realistic build rates for housing and constraints to delivery in the borough.*
3. *However, it is in NLP's view that any figure significantly lower than this 190 – 220 range would be unlikely to allow for the provision of a suitable level of affordable housing in the borough; nor would it allow the borough to pursue its economic growth objectives without potentially encouraging unsustainable levels in commuting from neighbouring districts. The 190 – 220 DPA range also reflects the potential for increasing the delivery of housing in Ribble Valley following the relaxation of the Housing Policy restraint.*
4. *It will be important to monitor progress on housing delivery and the changing demographic characteristics of the residents to ensure that the range of 190 – 220 dwellings per annum remains both suitable and achievable.*

4.4 It is also important to recognise that a number of factors are identified as being part of the process to determine a housing requirement. These include having regard to the wider debate over the scale of housing. In particular the extent to which development can be accommodated especially given the sensitive and protected landscapes in the area together with the ability of existing locations to absorb development including the extent to which planned growth is identified and promoted. It is also important to consider this within the scope of the vision and objectives that have been developed for the Core Strategy as well as aspirations of other Council priorities such as delivering affordable housing. In addition there is the need to recognise the availability of data in particular the impacts of new data becoming available through the release of the 2011 Census and the practicalities of incorporating a planned review to take this into account. It is also considered that review should be considered in order to reflect any implications of the uncertainties of existing economic circumstances given the current and ongoing economic climate.

## 5 CONSULTATION

5.1 It was agreed by Members that consultation was an important part of the process and accordingly the consultant's report was published between November and December 2011 inviting comments on the report and the housing requirement review. The report was published on the Council's website, press releases issued and the direct mailing of the extensive contacts listed on the Council's LDF database with an invitation to comment. This consultation generated some 139 submissions from a range of respondees. Most (118) were from members of the general public who have continued to take part in the broader Core Strategy process, other were more technical submission on behalf of landowners, developers or house builders.

- 5.2 All responses, in redacted form, are available for reference at Level C Reception in the Council Offices. A summary of the responses is included as Appendix 3 to this report. As may be anticipated responses ranged from a fundamental opposition to house building through those that presented a view on the level of housing requirement thought to be acceptable, to those seeking a significant increase to that suggested by the NLP report as a matter of technical challenge. Some of the more technical responses that cited alternative assumptions or challenged specific elements of the modelling and consultants advice have been referred to the Council's consultants for review and comment. An update on the consultants views will be given at the Committee meeting.
- 5.3 To inform the process and to provide an opportunity for consideration of issues by Members in more detail, a Member Working Group was set up. The report to Planning and Development Committee on 11 August 2011 and 10 November 2011, (Minutes 267 and 462 respectively), provides more information on this including Terms of Reference. Appendix 4 to this report sets out the report of the Chair of the Working Group including the conclusion of the group and its recommendations to Members of the Committee.
- 5.4 It is clear from the responses received that there will always be diverse views on the matter of housing requirements. It is also clear that of those that responded, the general public did not support the advice provided by the consultants. Members will need to balance the desire expressed by some to see no (or extremely limited levels) of new housing with those who seek higher levels of development through development aspirations. Members will also have to take account of other elements of available evidence in drawing a conclusion.

## 6 DISCUSSION AND CONCLUSIONS

- 6.1 The housing requirement needs to be established in order to progress the Core Strategy and ultimately to inform decisions on planning applications. Agreement of a working figure will enable the housing requirement to be tested through the LDF process and will mean that the implications of the emerging strategy can be appraised and infrastructure delivered in a co-ordinated way through the planning process. National Policy sets out clear guidance in terms of the approach to addressing housing requirements and the Council has taken steps to meet that guidance.
- 6.2 The principal evidence for the Council to consider is set out in the consultants report which concludes that an appropriate level of housing based on the evidence and modelling would lie between a range of 190 – 220 dwellings. The advice is also clear in terms of identifying a requirement of less than 190 as sought by many local residents. Clearly the consultation, as might be expected, generated a wide range of comments and as the summary of responses shows reflects a range of interests that might be anticipated. In general it can be demonstrated that the majority of professionally based responses (acknowledging their clients interests) indicate the higher end of the NLP range to be a minimum level of requirement if growth is not to be inadequate for the needs of the area and to meet Government and Council aspirations. Some are clearly seeking to pursue much higher levels of growth for which we await the consultants response and which in any event if not accepted, will be capable of further examination through the Core Strategy process.
- 6.3 It is also important to be mindful of other evidence that national guidance highlights such as the SHLAA and indeed Government projections. The SHMA as Members will recall

follows an established methodology and identified in terms of affordable housing a requirement to provide in the order of 264 dwellings per annum, simply to bring affordable requirements into balance. The attainment of this level of development especially given the mechanisms to deliver affordable housing is not viewed as realistic notwithstanding that, the SHMA indicates its results as it does. Similarly it is important to note as NLP do the position derived when using the most recent CLG household projections for the area, which would indicate a requirement of some 5,190 dwellings over the plan period or 260 per annum.

- 6.4 It is relevant to take into account the fact that in any event the projections and modelling can only ever be based on the data available at the time. This also includes the reality that new housing development and market performance as well as conditions within the national and local economy have been influenced by the recessionary impacts that have occurred since 2007/8. This will have had some influence on circumstances over the initial plan period we are examining and the actual position that is operating at present. This in itself would lead to a cautious approach to a long-term requirement based on the realities of the data we have to work with. Indeed the timing of the release of the 2011 census data to enable an update to the demographic based requirement will be an important factor to take into account. However the process cannot be placed in abeyance pending the opportunity to carry out that work.
- 6.5 Given the considerations set out above and having regard to the consultations, consultants advice and evidence, whilst noting the underlying concerns of the local community it would be appropriate, in my view, to consider the housing requirement to be set towards the upper range of the consultants indications namely to prepare the Core Strategy on the basis of initially providing some 4,400 dwellings over the plan period (220 dwellings per annum) but that as part of the strategy a clear review is identified to be undertaken no more than 5 years from adoption. This will accommodate new census data, by that timeframe the Strategic Housing Market Assessment would have been reviewed as a matter of course to take account of changing evidence and the impact and extent of economic recovery would be known. If the level of 220 dwellings per annum was accepted this is close to the projected CLG figures and given the flexibility for additional development to come forward through neighbourhood planning, exceptions for affordable housing and an emerging development strategy that supports regeneration opportunities as well as affordable housing provision, this level of housing provision is not precluded from being delivered.
- 6.6 It is important to bear in mind that the process of distribution and scale of growth at any given settlement is not a function of the current task of establishing the appropriate level of housing requirement against which the Core Strategy will be set. However it is important to appreciate what the housing requirement indicated above (220 dwellings per annum) would actually mean going forward. Firstly it is important to bear in mind that this figure would not be an absolute ceiling, there will always be a need for an element of flexibility, and it is clear from the draft NPPF that there is a clear approach from Government to have in place a mechanism to boost the supply of housing and through housing delivery support economic growth in a responsive manner. The Council's policies will need to ensure that this can be met. It is also important to have in mind that whilst an annualised figure (220) is used for purposes of monitoring and managing delivery through the identification of a five-year supply actual delivery each year may be higher or lower and at any time a higher number of approvals may be in the system.

6.7 The most important figure in relation to the Core Strategy becomes the figure for the plan period against which the Development Strategy is applied. It should also be noted that the housing requirement relates to the plan period, those houses completed or with existing planning permissions need to be taken into account. With this in mind by way of illustration on the basis of a requirement to meet 4,400 dwellings between 2008 and 2028 the housing position would be as follows:

Requirement 2008/2028:	4,400 (220 dpa)
Completions:	300
Existing planning permissions *:	694
Requirement to find up to 2028	3,406 (@ 16.5 yrs remaining period = 206 dpa)
Assuming Strategic site agreed	- <u>1,040</u>
Dwellings to accommodate	2,366 **

Figures as at the 1 October 2011

\* Planning permissions include affordable permissions but exclude any discounting for slippage.

\*\* This equates to an annual equivalent over the remaining plan period of 143 dwellings per annum to be planned for, over and above existing completions, commitments and the proposed strategic site.

6.7 Within the context of the remaining plan period therefore and the proposal to consider delivery by way of a strategic site as a key component of the Strategy the remaining provision on the basis of the upper end of the NLP range would mean in effect planning for a requirement going forward of some 2,370 dwellings.

## 7 RISK ASSESSMENT

7.1 The approval of this report may have the following implications:

- Resources – None.
- Technical, Environmental and Legal – In forming a judgement Members will need to ensure a justified and evidence-based approach is taken in line with existing planning policy guidance.
- Political – There is significant interest in housing and related Core Strategy issues.
- Reputation – The decision taken will influence future planning decisions and demonstrate the ability to take the lead role on issues of significance to the local community.

## **8 RECOMMENDED THAT COMMITTEE**

- 8.1 Agree for the purposes of the Core Strategy that the housing requirement is set at the upper extent of the range advised by the Council's consultants, namely 4,400 dwellings during the plan period and that provision for a formal review is undertaken within 5 years of adoption of the Core Strategy is included in the proposals.

### CHIEF EXECUTIVE

#### BACKGROUND PAPERS

- 1 Planning Policy Guidance Note 1 – Sustainable Development.
- 2 Planning Policy Guidance Note 3 – Housing.
- 3 Planning Policy Guidance Note 12 – Local Spatial Planning.
- 4 Ribble Valley Housing Requirement – Nathaniel Lichfield and Partners.
- 5 Consultation response files.

For further information please ask for Colin Hirst, extension 4503.

### **EXTRACT FROM PPS3 – HOUSING**

#### **Strategic housing policy objectives**

9. The Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this, the Government is seeking:

- To achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community.
- To widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need.
- To improve affordability across the housing market, including by increasing the supply of housing.
- To create sustainable, inclusive, mixed communities in all areas, both urban and rural.

#### **Planning for housing policy objectives**

10. These housing policy objectives provide the context for planning for housing through development plans and planning decisions. The specific outcomes that the planning system should deliver are:

- High quality housing that is well-designed and built to a high standard.
- A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural.
- A sufficient quantity of housing taking into account need and demand and seeking to improve choice.
- Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure.
- A flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate.

### THE CORE STRATEGY VISION

The Ribble Valley will be an area with an exceptional environment and quality of life for all, sustained by vital and vibrant market towns and villages acting as thriving service centres, meeting the needs of residents, businesses and visitors. We will seek to create an area with unrivalled quality of place, respecting the unique, natural, social and build heritage of the area.

New development to meet the needs of the area for growth, services and quality of life will be managed to ensure the special characteristics of the area are preserved for future generations.

Strategic Objectives:

Respect, protect and enhance the high quality environment and biodiversity in the borough.

Match the supply of affordable and decent homes in the borough with the identified housing needs.

Ensure a suitable proportion of housing meets local needs.

Improve the competitiveness and productivity of local businesses by safeguarding and promoting local employment opportunities.

Ensure neighbourhoods are sought after locations by building cohesive communities and promoting community safety.

Support existing retail business while improving the retail offer by ensuring the vitality and viability of the retail areas are considered.

Co-ordinate, innovate and diversify sustainable tourism, building on our strengths and developing new initiatives.

Improve accessibility and service delivery to address rural isolation.

Contribute to local, regional and wider sustainable development.

## APPENDIX 3

### SUMMARY OF RESPONSES TO CONSULTATION ON “ DEFINING A LOCAL HOUSING REQUIREMENT”

(Consultation from November to December 2011)

Responses to this consultation fell into two main groups; the first comprising those from local residents and the second from a group comprising planning agents, statutory respondents such as government agencies or adjacent local authorities, and local action groups. As responses from the two groups are sufficiently different in content and approach it is sensible to summarise them separately before any wider Ribble valley summary can be made.

#### **A total of 139 responses were made**

#### **118 (85%) were made by local residents**

#### **21 (15%) were made by agents, govt agencies, adjacent authorities, action groups etc**

#### **Part A - Local Residents' Responses.**

There were 118 responses from local residents. In total, as many raised more than one point in their response, there were 446 points raised.

**In terms of the overall reaction to the recommendations of the NLP report (ie the housing range of 190 – 220 units per year) 83% (98) of responses were opposed to these figures, feeling them to be excessive.**

**Only 9% (11) of responses supported or agreed with the NLP recommended figures, with the remaining 8% (9) of responses a combination of non committal or those that were difficult to interpret or that dealt with issues not relation to the housing requirement question.**

Most answered with a response relating to the whole Borough, although a minority responded instead about their locality, eg Clitheroe, Sabden etc.

The most often quoted reasons given by those opposing the recommendation were:

1. **Infrastructure** (mentioned 86 times either in general or in relation to specific types of infrastructure)

30 points related to local infrastructure in general being unable to cope with the NLP recommended figure or that people doubted that it would be provided to accompany any new development.

Specific aspects of infrastructure deemed currently under pressure were also mentioned:

Traffic Congestion, impact on local roads - (21 mentions)  
Education lack of provision, schools unable to cope - (14)  
Health Provision (7)  
Drainage (7)

Parking (6)  
Open Space (1)

**2. The Local Economy** (mentioned 43 times)

The main thrust here was that people felt that the NLP assumptions of future economic growth were based on past periods of growth that were no longer relevant and the figures ignored the current economic constraints. Some felt that renewed growth was a long way off.

In addition some wanted to know where the jobs were going to be for those occupying the proposed new housing given that some high profile local firms were currently laying workers off.

**3. Current levels of houses for sale or lying empty.** (mentioned 33 times)

Responses here focused on the belief that there are many houses (ie an unusually high amount) currently for sale and some also feeling that there are a considerable number of empty properties in the area and that therefore this indicated that there was not the need for a significant amount of new build suggested in the report.

**4. The Wider Environment, Character of the Area** (mentioned 32 times)

Comments here related to opposition to development on Greenfield sites and that brownfield sites should be prioritised, and that the scale of development proposed in the recommendations would be environmentally unacceptable for a rural area.

**Consultants Have a Conflict of Interest, Too Close to Developers.** (10 responses)

Comment here felt that the consultants were not objective and that they were in some way in general terms too close to development interests to give an objective view that represented the wider local interest.

**Planning Time Scales** (7 responses)

Some felt that it was inherently difficult to plan over a period of 20 years or so and that the world was too changeable to make such planning meaningful and accurate. Planning should be done over shorter time frames that better reflected the real world.

**Suggestions of Alternative Housing Requirement Figures.** (c 98 responses)

There was no clear alternative housing figure from those who felt that the 190 – 220 recommended figure was too high. Responses varied from “No more houses” and build new housing elsewhere outside the Borough to support for the existing 161 per year figure. Many respondents (42) did not state a figure or an option that they preferred but simply expressed their rejection of the 190 – 220 figure in various ways. Those who did state a preference are detailed below:

No more houses	4
Between 0 and 50 houses per year (including support for option C)	1
Between 50 and 100 per year (including support for options B to C)	25
Between 100 and 150 per year	16
Between 150 and 161 per year	6

(In addition there were 4 responses that, while alluding to a figure, were difficult to categorise)

### **Part B. Responses by Planning Agents, Government Agencies, Other Local Authorities, Action Groups etc**

Of the 21 responses received from this group 5 made detailed technical points which have been passed on to NLP for a detailed reply. In addition a further 6 responses stated that they had no comment to make on the consultation. The remaining 10 responses are briefly summarised on an individual basis below.

**Briefly the responses below taken together generally indicate support for figures higher than the NLP recommendation of 190 – 220.**

#### **1. Carter Jonas**

Feels that any figure should acknowledge pre-moratorium build rates. Goes on to state that the 190 – 220 figure recommended “sits conservatively in the middle” of the range of housing figures presented. On the whole they support an increase in housing numbers across the district “where this meets market requirements, supports economic growth and the needs of employers as well as addressing local need”

#### **2. Smith Gore**

Feels that a policy for no housing would lead to stagnation. States that the NLP recommended figure is lower than the latest Government household projections and employment forecasts as NLP consider it reflects realistic build rates and agree that any figure lower than the 190 – 220 would not deliver a suitable level of affordable housing. 220 should be the minimum figure with flexibility to increase to 260 to take into account future trends.

#### **3. Planning Bureau**

Expresses concern that the report contains no direct comment regarding the housing need that the predicted future population will generate. Supports the need for future private sheltered accommodation schemes.

#### **4. House Builders Federation**

The Council should plan on the basis of Scenario E (Past Trends Job Growth - 559 units per year) to reflect Government objectives to support economic growth. Feels it is right that the Council should plan to encourage new migrants to the area to increase the economically active element of the population and help to sustain local services. Oppose Scenario B (Natural Change) as this would lead to a fall in population and economic activity. Also opposed to Option C (Zero Net Migration)

#### **5. Turley Associates**

State that the housing figure should not be lower than 220 per year. Feels that the NLP recommended range can be questioned regarding its appropriateness in relation to demographic derived forecasts which indicate a level of 260 per year. Suggests that further work should be carried out to test a range of 220 – 260 to ensure better consistency with Government household projections.

## **6. United Utilities**

No comment on housing figures. Goes on to make comments regarding policies within Core Strategy. But points out that infrastructure investment will be required to support any major development schemes.

## **7. Co –operative Estates**

Agree that forecasts based on employment led statistics are unreliable as they depend on past growth trends which do not reflect the on going period of economic instability. Support a figure towards the higher end of the recommended 190 – 220 range. Also feel that the annual figure should align with the pre recession completion figure of 225 per year.

## **8. Stephen Abbott Associates**

Not clear why the recommended figure has been selected. Feels the NLP comment that the figure reflects local constraints on development which seems at odds with the findings of the SHLAA which shows sites for 5441 deliverable units. Also points to the SHMA showing a need for 264 per year. Therefore feels that the 190 – 220 figure will risk undershoot in relation to need and demand. Feels that under provision risks infrastructure delivery problems arising from piecemeal planning, some by appeal. Also points to need to conform to NPPF.

## **9. Janet Dixon Town Planners**

Feels that the range 190 – 260 is most realistic. However feels that the vacancy test of 1.9% is achievable therefore making figures close to 190 unrealistic. Feels that 220 –260 more realistic. This is close to historic completion rates.

## **10. Dickman Associates**

Feels that the NLP report does not take into account NPPF requirement for 20% minimum increase in first 5 years. Also uncertain whether the 190 – 220 figure is gross or net. Feels that the 190 – 220 figure is unclear as to whether it takes into account likely economic growth. The SHMA indicates 264 per year and historic completion rates are over 220 per year.

### RIBBLE VALLEY BOROUGH COUNCIL – PLANNING & DEVELOPMENT COMMITTEE

#### REPORT OF MEETINGS OF HOUSING NUMBERS WORKING GROUP

##### 1 Introduction

Approval was given for the LDF Core Strategy – Outline Approach set out in Agenda Item No 7 Appendix 1 at the 8 Dec 2011 Planning & Development Committee. The housing numbers, etc in the paper were based on the RSS figure of 3220 over the 20 year period 2008-2028 (equivalent to 161 pa). For consistency, 3220 is the figure which has been used in all projections, etc until a firm figure is agreed by RVBC bearing in mind that the public consultation period on the RV Housing Requirement (Nathaniel Lichfield) report did not end until mid-December. P&D Committee agreed at their 10 Nov 11 meeting that a small Housing Review sub WG be formed to consider the responses to the consultation & report back to Committee. The Group was set up with the following members: Cllr R Sherras (Chair), Cllr T Hill, Cllr S Bibby, Cllr G Mirfin together with Colin Hirst. Its objectives (from 10 Nov 11 P&D Ctee) were:

##### 3. OBJECTIVES

3.1 To provide a forum to discuss the findings of the consultant's report and the implications for the proper planning of the borough.

3.2 To consider the consultation response to the Housing Requirements Review Report and identify any key matters of concern.

3.3 In the light of the consultation response to consider the recommendations in the Council's report and contribute advice to the Planning and Development Committee on an appropriate level of housing provision.

The WG formally met on 2 occasions – 5 Jan 12 & 20 Jan 12, but in addition several pieces of information, etc have been exchanged/distributed.

##### 2 Consultation & Responses

In addition to its publication in the 11 Aug 11 report to P&D (publically available), responses to the findings of the Nathaniel Lichfield report were specifically invited from those on the previous core strategy respondent database. The majority of the responses were of a general nature or related to only specific areas/settlements rather than the overall RV housing requirement – these are being analysed separately. Some responses addressed the overall requirement, of these: 2 made detailed points about the need to increase the requirement above the Nathaniel Lichfield recommendation (3800 – 4400 [190 – 200pa]) & 1 made a case for a reduction from the 3220 (RSS) figure.

The Working Group have asked Nathaniel Lichfield for their views on the responses & whether they wish to change the recommendations at Section 6.2 of their original report:

1 Taking into account the scenarios tested and the core constraints on development delivery as shown by current evidence, it is NLP's view that the dwelling requirement for Ribble Valley Borough should be in the range of 190-220 dwellings per annum between 2008 and 2028;

2 This figure is lower than the latest CLG household projections and particularly the employment-led growth forecasts, to reflect realistic build rates of housing and constraints to delivery in the Borough;

3 However, it is NLP's view that any figure significantly lower than this 190-220 range would be unlikely to allow for the provision of a suitable level of affordable housing in the Borough; nor would it allow the Borough to pursue its economic growth objectives without potentially encouraging unsustainable levels of in-commuting from neighbouring districts. The 190-220 dpa range also reflects the potential for increasing the delivery of housing in Ribble Valley following the relaxation of the housing policy restraint;

They have promised that their views will be received by us in time for them to be reported at or before the Feb 2 P&D Ctee meeting.

### **3 Working Group Deliberations**

The first meeting (5 Jan 12) considered the responses & discussed the changes in the housing & economic situation since the SHMA (Strategic Housing Market Assessment) was consulted upon & finally adopted in December 2008 by RVBC as part of evidence base. There was an extensive discussion on the SHMA. It was agreed that although it may need revisiting later in the 20 year plan period as more up to date information became available (eg 2011 census data), it would not be appropriate to discount it totally at present. Arguments for or against specific parts could however be accommodated by building some flexibility into the final figures. It was also agreed that we seek Nathaniel Lichfield comments on the 3 detailed responses & ask whether they wish to change their original recommended housing requirement numbers in the light of the comments. The meeting closed with a view to reconvening when more information & hopefully N Lichfield comments were available & WG members had had an opportunity to look at the responses overall in more detail. As stated above N Lichfield have agreed to comment but their views will be reported to P&D Ctee.

The second meeting (20 Jan 12) was held to come to some conclusions to enable Colin Hirst to write his report for submission to the special P&D Ctee meeting on 2 Feb 12. Various items containing information/views prepared mainly by individual members after the first meeting were discussed. These covered: an overall assessment of economic, etc data available & its relevance to RV housing requirements; more detailed figures of the possible effect on settlements as defined in the Approach to a Preferred Option report approved by P&D Ctee at their 8 Dec 11 meeting; the need to emphasise the need for phasing of delivery of the overall 20 year total requirement rather than a flat annual requirement eg 3200 over 20 years equated to 161 pa.

### **4 Conclusions & Recommendation to P&D Committee**

This has been a most difficult task in trying to balance conflicting views on the relevance of economic, housing, demographic, etc data with the practical need to recommend a level which:

- a. Can be successfully defended against challenges at Examination in Public (EIP)
- b. Is acceptable to residents in the Borough at both settlement & borough level as being reasonable

The Working Group elected members agreed that despite many reservations a figure must be recommended as a basis for Colin Hirst & his fellow officers to proceed with producing a draft Preferred Option for the Core Strategy. Without that, both our sustainability consultants, Hyder, and those charged with producing the mandatory Infrastructure Plan will find it virtually impossible to proceed with possible impacts/requirements.

With the reservations & qualifications above & the observations below, the 20 year requirement recommended to Committee is 4000 dwellings (equivalent to average of 200 pa).

### **6 Working Group Observations**

There are some important observations which the WG members wish to record as being important in any debate, even though some may be outside the WGs terms of reference.

1. There is a need to think of phased delivery of the total 20 year requirement rather than the flat equivalent annual requirement. This takes account of the varying levels of economic activity & accommodates market troughs & peaks.
2. The current numerical requirements can only be based on overall requirement less definite permissions ie the permissions/completions between 2008 to present date can be deducted – currently these amount to almost 1400.
3. Account is not taken of those planning permissions already granted but for which the necessary Section 106 agreement has not been signed. Technically these do not yet

have full permission but it is considered unlikely that they will not be agreed & signed. These currently add up to 400 dwellings.

4. Taking points 2 & 3 into account leaves a net requirement based on the recommendation of 4000 less  $(1400 + 400) = 2200$ . If one then takes into account the Strategic Site concept (1040 dwellings) identified in the 8 Dec 11 report to P&D Ctee then the figures become:

$$4000 \text{ less } (1400 + 400 + 1040) = 1160$$

Richard Sherras  
Chair, Housing Numbers Working Group

20 Jan 12