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Gladman Developments Ltd

Ribble Valley Core Strategy

Consultation on Core Strategy

Proposed Main Modifications

GLADMAN

July 2014

1 INTRODUCTION

1.1.1 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure.

1.1.2 This submission provides Gladman Development's representations on the Proposed Main Modifications to the Ribble Valley Core Strategy. These follow the conclusion of the resumed Core Strategy Examination Hearing Sessions in January this year and come after the authority's Core Strategy Main Changes and updated Evidence Base consultation in August 2013. Significant issues highlighted by the Inspector appointed to examine the Ribble Valley Core Strategy led to the suspension of its Examination in November 2012.

1.1.3 Through our previous representations on the Council's Core Strategy Main Changes, Gladman highlighted its significant concerns that the proposed overall housing requirement of 5,000 dwellings for the Core Strategy period 2008-2028 was too low to meet the authority's full objectively assessed needs. We submitted that the Council had failed to plan for the 280 dpa that were evidently needed to meet its economic needs or shown the significant and demonstrable harm that outweighed the benefits of delivering a higher requirement. Our representations were supported by a brief note prepared by Regeneris Consulting, reviewing the adequacy the Council's proposed housing requirement and the findings of its updated evidence base.

1.1.4 In light of our previous representations Gladman welcome the Council's decision to now increase the overall scale of housing sought through the Core Strategy to 5,600 dwellings, or 280 dpa. However, whilst generally supporting this modification, we submit that to be found sound this must be treated **as the minimum level of housing growth** that will be sought in the borough, taking account of 'policy on' economic developments that could add further pressure on the labour supply in Ribble Valley. Gladman are further aware of other work undertaken by Regeneris Consulting and referred to in our previous representations that has shown a **target of 300 dpa** would be an appropriate basis for planning in the borough. To ensure the economic needs of the borough are met, this may now be a more appropriate requirement for the Council to adopt.

1.1.5 The Council's modifications to Key Statement DS1: Development Strategy identify nine Tier 1 Villages from the list of 32 defined settlements previously included in the Core Strategy, reflecting the recommendations of the Plan Inspector. Whilst supporting the general principle of directing growth to sustainable settlements, we submit that this should not come at the expense of further development in lower order settlements, which could help to maintain their ongoing vitality. We further note that after allowing for completions and

commitments, just 145 further dwellings will be sought in the borough's Tier 1 Villages over the remaining Plan period. We submit that this level of housing growth is alarmingly low, and as a consequence the development requirements for these villages **must be treated as a minimum**.

2 MM12 – KEY STATEMENT H1: HOUSING PROVISION

2.1.1 The Council's main modifications to Key Statement H1: Housing Provision sets out a revised overall housing requirement of 5,600 dwellings over the Core Strategy period 2008-2028, equating to 280 dpa. This represents an increase of 600 dwellings over the previous Plan requirement of 5,000 dwellings, put forward through the Council's Core Strategy Main Changes in September 2013 and tested at the January 2014 Core Strategy Examination.

2.1.2 The proposed modifications to Key Statement H1 follow an Inspector's Letter to the Council after the close of the January 2014 Examination Hearing sessions. Discussing the content of the Council's 2013 Housing Requirement Update report and its recommendation that 280 dpa would be needed to provide both housing and economic growth, the Inspector's Letter describes how a target of 250 dpa would fall short of meeting the requirements of the Framework and the authority's economic needs, with little to substantiate that the adverse impacts of pursuing this lower requirement could be adequately addressed, and no clear evidence from the authority's Sustainability Appraisal Addendum that 280 dpa could not be met. Based on the conclusion that the Council's proposed requirement represented a 'hybrid' option which had no clear or full objective analysis to validate it, the Inspector recommends that a housing requirement of at least 280 dpa would be necessary for soundness.

2.1.3 Taking the Inspectors findings and our previous submissions to the Council into account, Gladman welcome the Council's decision to now increase to the proposed housing requirement for the borough to 280 dpa. Based on the findings of the Council's evidence base, it is clear that a housing requirement **of least 280 dpa** should be proposed to meet Ribble Valley's full, objectively assessed needs.

2.1.4 In light of our concerns over the adequacy of the Council's proposed housing requirement Gladman previously commissioned Regeneris Consulting to undertake a brief review the Council's housing evidence. Consistent with the findings of the Core Strategy Examination Inspector, this supported the need for the Council to plan for a higher level of homes to meet the borough's needs.

2.1.5 Regeneris' note highlighted the inadequacies of the Council's previous 250 dpa target by picking out several elements of NLP's advice to the Council. This includes that the Council "*would need to demonstrate how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower growth approach (i.e. a figure below 280 dpa) could give rise to*", that their preferred scenario of 250 dpa "*would support some economic growth and would deliver affordable housing to respond to (at least some of) identified local needs*" and that more weight should be attached to the Council's updated job growth scenario than previous employment growth scenarios as it is based on "*a more up-to-date and robust level of employment growth*".

2.1.6 Regeneris' note further identified how the economic forecasts underpinning the Council's 2013 Housing Requirement Update report are based on a 'policy off' scenario and the creation of 1,600 new jobs by 2028, with a 'policy on' scenario, also taken from the Council's 2013 Employment Land Review Update, identifying the potential for a further 3,300 jobs to be created in addition this. Although recognising that many of these jobs would be created outside of the borough, Regeneris consider that this would definitely add to the pressure of labour supply in Rubble Valley, and is yet another reason as to why the Council should be planning to deliver **at the very least 280 dpa**.

2.1.7 Regeneris' note goes on to highlight that other recent work[1] looking at the housing needs of Ribble Valley has shown **that a figure of 300 dwellings a year** would be an appropriate basis for planning in the borough. This uses data and information consistent with the Council's 2013 Housing Requirement Update report, but utilises higher assumptions of future employment growth.

2.1.8 Taking account of the above considerations, it is clear that the Council's modified housing requirement represents a welcome and necessary increase the level of housing provision sought in borough. However whilst generally supporting this modification, we submit that 280 dpa should be considered **the minimum justifiable level of housing that would be acceptable in the borough**, and may be overly cautious. It is clear from the Council's 2013 Employment Land Review and the evidence provided by Regeneris consulting that a higher level of economic growth may take place in the borough, resulting in the need for further residential development, greater than 280 dpa. As suggested by Regeneris' note, it

[1] Stephen Nicol Proof of Evidence, Appeal on Behalf of Barrow Lands Company Limited, Land west of Whalley Road and south west of Barrow, PINS Ref: APP/T2350/A/13/2190088/NWF

is the case that a housing requirement **of 300 dpa** may represent a more appropriate basis on which to plan for the borough's housing needs.

National Planning Policy Guidance

2.1.9 As the Council will be aware the Government published its live suite of Planning Practice Guidance (PPG) on the 6th March 2014, clarifying how specific elements of the Framework should be interpreted when preparing their Local Plans. The PPG on Housing and Economic Development Needs Assessments in particular provides a clear indication of how the Government expects the Framework to be taken into account when identifying their objectively assessed housing needs. Key points from this document include:

- Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need
- Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic underperformance, infrastructure or environmental constraints.
- Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.
- Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.
- Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.
- The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.
- The total affordable housing need should be considered in the context of its likely delivery as proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes.

2.1.10 Although the Government's draft suite of Planning Practice Guidance was published at the time of the Core Strategy Examination, the Council should now ensure that the housing requirements for the borough are fully consistent with its requirements.

3 MM25 – KEY STATEMENT DS1: DEVELOPMENT STRATEGY

3.1.1 Main Modification MM25 sets out the Council's proposed changes to Key Statement DS1. These changes reflect the issues raised over the distribution of housing between the borough's 32 defined settlements in the Core Strategy through the Inspector's 31st January 2014 Letter to the Council, with Key Statement DS1 now identifying nine, more sustainable Tier 1 Villages to which development will be directed, outside of the borough's principle settlements and the Standen allocation.

3.1.2 Whilst Gladman recognise and generally support the purpose of the Council's modifications to Key Statement DS1, we submit that the Core Strategy **should not overlook the need for further development in the remaining 23 Tier 2 Villages**. Growth should be directed to sustainable settlements that benefit from local services and facilities, however this should not preclude further development from coming forward in lower order settlements, which could help to ensure their ongoing vitality. The amount of development directed to a settlement should be based on its ability to support further development, rather than based solely on its size, existing households or population.

3.1.3 Gladman note from the proposed amendments to Core Strategy Appendix 2 that once completions and commitments have been taken into account the residual level of homes to be provided in the Tier 1 Villages is 145 dwellings over the remaining Plan period, based on the Longridge Adjustment. We submit that this is alarmingly low, effectively allowing for **very little or no further growth in these locations for the next 14 years**. We therefore submit that the housing targets from these villages **must be stipulated as a minimum**. Unnecessarily restricting further growth in these locations over the remaining Plan period would not be consistent with the requirements of the Framework and the positive approach to development that it requires.

3.1.4 The Council's strategy continues to be heavily reliant on the Standen allocation, accounting for 1,040 dwellings of the Core Strategy's overall housing requirements, whilst a further 504 dwellings have recently obtained outline consent in Barrow. Whilst supporting the general principle of large scale developments such as these, they can often be slow to come

forward, come forward at a slower rate than expected, and fail to deliver the level of homes originally envisaged.

3.1.5 The Council should therefore ensure that it can demonstrate a sufficient supply of deliverable and developable housing sites that can forward in the short term and over the Plan period to meet its housing needs, with flexibility and contingency for site that do not come forward as expected. The Plan should recognise that in some instances this objective may be best achieved through sites that do not benefit from a formal allocation, in accordance with the Presumption in Favour of Sustainable Development.

4 CONCLUSIONS ON SOUNDNESS

5.1.1 Through our previous submissions on the Council's Core Strategy Gladman strongly questioned the soundness of the proposed housing requirement of 5,000 dwellings for the Core Strategy period 2008-2028, equating to 250 dpa. We submitted that this scale of housing growth was inconsistent with the findings of the Council's own evidence base and fell short of the 280 dpa that were evidently needed to meet the borough's economic needs. We set out how the Council had critically failed to show the significant and demonstrable harm that outweighed the benefits of delivering a higher requirement.

5.1.2 Gladman therefore welcome the proposed increase in the Council's housing requirement from 5,000 dwellings to 5,600 dwellings, equating to 280 dpa. However, whilst we support this change we submit that this **must be treated as the minimum level of housing** to be provided in the borough, in particular taking account of further 'policy on' employment developments that may increase the pressure on the supply of labour in the authority. Gladman are further aware of other work undertaken by Regeneris Consulting that has shown a **target of 300 dpa** would be an appropriate basis for planning in the borough. To ensure the economic needs of the borough are met, this may now be a more appropriate requirement for the Council to adopt.

5.1.3 Main Modification MM25 amends Key Statement DS1 to identify nine Tier 1 Villages from the previously identified list of 32 defined settlements, to which further development will be directed outside the borough's principle settlements and the Standen allocation. Whilst recognising and supporting the general principle of these changes, the Council should not overlook the need for further sustainable development in lower order settlements, which could help to ensure their ongoing vitality. Gladman further note that once commitments and completions have been taken into account, only 145 further dwellings are required in the borough's Tier 1 Villages over the remaining Plan period. We submit that this is

alarmingly low, and accordingly the development targets for these locations **must be treated as a minimum.**