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Dear Planning Policy Team,

## **RIBBLE VALLEY LOCAL PLAN: REGULATION 18 STRATEGIC ISSUES CONSULTATION**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Ribble Valley Local Plan Regulation 18 Strategic Issues consultation.
2. 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.
3. The HBF notes that the Council are preparing an updated strategy and new Local plan to replace to the existing plans including the 2014 Core Strategy and the 2019 Housing and Economic Development DPD.

### **Plan Period**

4. The HBF considers that any update should ensure that the Plan covers a period of 15 years from the adoption of the Plan. This is likely to mean the Plan will need to cover the period until 2040.

### **Housing Requirement**

5. The Core Strategy established a housing requirement for the period 2008 to 2028 of 280 dwellings per annum (dpa), however, since then the Standard Method has been introduced. The Council identify the Standard Method calculation for Ribble Valley as of March 2021 as 130 dpa. The Council propose to introduce a housing requirement of 2,330 dwellings for the period 2021-2038, equating to 137dpa. The Council suggest that they have a current housing supply of 3,064 dwellings.
6. The NPPF<sup>1</sup> states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method set out in the PPG. The PPG sets out the method for calculating the minimum annual

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<sup>1</sup> NPPF 2021 Paragraph 61



local housing need figure<sup>2</sup>. The Standard Method identifies a minimum Local Housing Need (LHN) of 127dpa<sup>3</sup>. The PPG<sup>4</sup> also sets out when it might be appropriate to plan for a higher housing need figure than the standard method, these include where there are growth strategies for the area, where there are strategic infrastructure improvements, where an authority is taking unmet need from a neighbouring authority, and where previous levels of housing delivery, or previous assessments of need are significantly greater than the outcome from the standard method.

7. The HBF generally supports the Council in utilising a figure over and above the LHN identified by the Standard Method. However, the HBF considers that the Council should give further consideration for the need to increase the housing requirement over and the minimum annual LHN figure identified by the standard method.
8. The Strategic Housing and Economic Needs Assessment (SHENA) (Turley, April 2020) provides evidence that suggests that the actual housing need is higher than the standard method indicates. It highlights that the demographic baseline is unreliable in relation to Ribble Valley's population; that the housing delivery has been significantly greater than the minimum figure identified by the standard method; and that higher housing growth would be needed to support economic and job growth. Modelling by Edge Analytics indicates that up to 248 dwellings per annum would be needed in Ribble Valley to grow the labour force and support baseline employment growth (job growth of 0.2% each year). If a higher rate of overall employment growth is implied (0.3-0.4% per annum) could potentially be supported by retained the 280dpa requirement. The report considers that in the context of the NPPF and PPG, retaining the existing requirement (280dpa) would proactively address a potential barrier to investment and enable a continuation of the housing delivery achieved in stronger years over the long-term.
9. Table 1 below show the previously levels of housing delivery and highlights that these are significantly greater than the outcome from the standard method.

	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	Average
<b>Ribble Valley</b>	147	172	176	344	300	390	400	403	559	453	<b>334</b>

10. The Council's housing land supply should include a short and long-term supply of sites with both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, with a range of sites by both size and market location. A wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice and competition in the land market. The Council should identify

<sup>2</sup> PPG ID:2a-004-20201216

<sup>3</sup> MHCLG Household Projections 2014 2022: 26,080, 2032:27,186, average change 110.6. Adjustment factor 2021: 1.1519.

<sup>4</sup> PPG ID: 2a-010-20201216

at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements. The Council should also provide some headroom between its minimum housing requirement and overall housing land supply. Whilst there is no numerical formula to determine the appropriate quantum of headroom, if the Local Plan is highly dependent upon one or relatively few sites and geographical locations then greater numerical flexibility is necessary than where supply is based on a more diversified portfolio of sites.

### **Affordable Housing**

11. The SHENA calculates a need for affordable housing of 88 dwellings annually. The Council identify the key relationship between the delivery of affordable housing and the housing requirement. The Local Plan consultation document highlights that affordability is a key issue within the Ribble Valley with very high house prices that place pressure on residents' ability to access housing. The Council identify that an advantage of the levels of housebuilding that have occurred in recent years is the ability to address the identified needs for Affordable homes through new development.
12. The HBF has significant concerns how the Council intend to deliver the 88 affordable dwellings needed each year to meet local need if the housing requirement is only 137dpa. The affordable need equates to almost 65% of the housing requirement. It is noted that the PPG<sup>5</sup> states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. Therefore, the HBF considers that the Council should also be taking this affordable housing requirement into consideration as part of their housing requirement.
13. The HBF considers that the Council's affordable housing policy will need to reflect the Government's requirements in relation to First Homes and Affordable Home Ownership. The Council may also need to update their evidence in relation to affordable housing and viability to ensure that it is up to date and appropriate to support any updated requirements in the Plan.

### **Viability**

14. The HBF considers that any policy requirements contained within the Plan should be informed by evidence of need and an assessment of viability. If the policies contained within a Plan are not viable this will lead to the non-delivery of homes and potentially the Plan.

### **Future Engagement**

15. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
16. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

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<sup>5</sup> PPG ID: 2a-024-20190220



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