

Issues and Options 2016 consultation,
Forward Planning,
Regeneration and Housing,
Council Offices,
Church Walk,
Clitheroe,
Lancashire, BB7 2RA
Email: issuesandoptions2016@ribblevalley.gov.uk
Sent by email only

10/10/2016

Dear Sir / Madam,

Housing and Economic Development DPD: Issues and Options

Thank you for consulting with the Home Builders Federation (HBF) on the Housing and Economic Development DPD.

The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.

The following comments relate solely to the Housing Options identified at Chapter 8 of the consultation document.

The HBF agrees that the level of housing set within the adopted Core Strategy together with the spatial distribution should provide the context for the *Housing and Economic Development DPD*. It should, however, be recognised that the Core Strategy housing requirement is identified as a minimum and not a maximum. It would, therefore, be appropriate for this plan to provide an element of provision over and above the stated housing requirement.

The consultation document suggests additional sites should be restricted to the Tier One settlements of Chatburn, Mellor and Wilpshire. This is to make up the residual housing requirements of 18, 18 and 36 dwellings respectively (table at paragraph 8.1). A residual requirement for 24 dwellings at Longridge is not intended to be dealt with via additional sites.

The consultation document identifies potential sites to make up these residual requirements. The HBF does not wish to comment upon the appropriateness of the identified sites.

The calculation of the residual requirement appears to be based upon a number of sources including, existing completions, allocations and sites with planning permission and a number of applications awaiting the signing of section 106 agreements. These sources account for a 2% buffer of 114 dwellings over the Core Strategy requirement of 5,600. Once the residual requirements identified at paragraph 8.1 are included the buffer increases to 210 dwellings or nearly 4% (including the 24 dwellings at Longridge).

Whilst the HBF is supportive of the Council providing a buffer of dwellings over and above the Core Strategy requirement the size of the buffer is not considered adequate to deal with any none or under-delivery from allocations or sites with planning permission.

To ensure that the overall plan requirement is met and the plan provides flexibility and choice as well as being able to rapidly respond to changing circumstances, all key requirements of the NPPF, it is important that the plan provides a reasonable buffer of sites. The need for a buffer is also supported by the recent Local Plan Expert Group¹ recommendations to Government. The report recommends a 20% buffer of reserve sites be provided to ensure that the plan can maintain a five year supply and respond flexibly and rapidly to change. The HBF agrees with this stance and concludes that given the recent history of under-delivery within Ribble Valley² it would be prudent to provide this buffer of reserve sites from the outset of the plan.

Further Consultations

I trust that the Council find the foregoing comments useful as it continues to prepare its Local Plan. I would be happy to discuss these comments further if required. I would also like to be kept informed of future consultations upon the Local Plan or other planning documents.

Yours sincerely,

MJ Good

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¹ Local Plan Expert Group (2016): Report to the Communities Secretary and to the Minister of Housing and Planning

² Ribble Valley BC (2015): Housing Land Availability Schedule, paragraph 2.