



THE HOME BUILDERS FEDERATION

Date: 19th March 2015

Consultee ID: 755915

Matter: 5

PENDLE CORE STRATEGY PLAN EXAMINATION

MATTER 5: HOW IS THE HOUSING REQUIREMENT TO BE MET

Question 1: Is Policy LIV1 effective in indicating how the housing requirement will be met, including the contribution that will be made from new allocations and existing commitments?

1. Policy LIV1 indicates that the Site Allocations and Development Policies DPD will allocate sufficient land to meet the remainder of the housing requirement once the delivery from the strategic site (Policy LIV2) has been taken into account. The Council has subsequently provided additional clarification through table LIV1 in the proposed main modifications document.
2. The HBF support the inclusion of sufficient allocations to meet the housing requirement in full it is, however, recommended that additional flexibility be required. Proposed Table LIV1 identifies that sufficient allocations will only be provided to meet the housing requirement with no further flexibility. It is unclear how the 'reserve sites' or 'provision of additional dwellings' referred to within Policy LIV1 fit into this table. The HBF would also point towards the requirements of the NPPF to plan positively and the need to provide flexibility within the plan.
3. The HBF recommends the Council provide further clarity upon the reserve sites and provide flexibility within the overall allocations to account for any under or none delivery from specific sites or current commitments.

Question 2: What contribution will be made to the housing requirement from bringing back empty homes into use?

4. The PPG identifies that local authorities may consider including empty housing as a source of supply. In doing so it is clear that any approach must be 'robustly' evidenced and 'avoid double counting' (ID 3-039-20140306). The Council's proposed main modifications, Table LIV1, identify that a zero contribution has been provided through empty homes. The Council's reasoning is that it does not currently have the evidence to support a target. The HBF supports this stance and considers that any empty homes brought back into use would provide an albeit small amount of flexibility to the plan requirement.

Question 3: Is there sufficient emphasis on the contribution that can be made from Housing Regeneration Priority Areas?

5. Whilst the HBF understands and supports the need to regenerate areas this should not be at the expense of overall plan delivery and meeting the housing needs of the area. In this regard the Council must have consideration to its own viability reports which identify that development viability is currently marginal across significant parts of the district.

Question 4: What contributions will be made to the housing requirement from windfalls?

6. The SHLAA (ref: CD/04/03) clearly identifies at paragraph 2.32 that due to the thorough nature of the site assessments a further windfall allowance cannot be justified. It is further noted that whilst windfalls have come forward in the past and are likely to do so in the future they are not considered a reliable source of supply in Pendle.
7. In these circumstances the HBF agrees with the Council that a windfall allowance should not be included. If windfalls do come forward in the future these will add flexibility to the proposed allocations.

Question 5: How are demolitions taken into account in the housing requirement?

8. The HBF is unclear how the Council intend to deal with demolitions, it is however noted that the housing requirement within Policy LIV1 is identified as a net requirement. This is supported.

Questions 6 to 11

9. The HBF has no further comments at this stage.

Question 12: Will the Plan be able to ensure a five year housing supply at the point of adoption, taking into account the need to make up any shortfall in provision from the start of the Plan period and the application of a buffer as required by paragraph 47 of the Framework?

10. The SHLAA (ref:CD/04/03) pages 26 and 27 sets out the Council's position in relation to the five year housing requirement and identifies a 5.3 year supply of housing land. Whilst the HBF agrees that the Council requires a 20% buffer, in compliance with paragraph 47 of the NPPF, we disagree with the overall calculation on a number of points.
11. Notwithstanding our concern with the housing requirement we note that the five year supply calculation is based upon the stepped housing requirement. The HBF does not consider such an approach to be appropriate, see comments within our matter 3 hearing statement. In addition the Council add the under-supply after the 20% buffer, this is incorrect. A number of recent appeal decisions including two at Droitwich Spa (appeal references: APP/H1840/A/13/2199085, APP/H1840/13/2199426) and another at Guisborough (appeal reference: APP/V0728/A/13/2190009) identify that the 20% buffer applies to both the under-supply and annual requirement.

12. The following table indicates that even with the stepped requirement the Council's five year supply position is extremely marginal, if a flat housing requirement is utilised the Council do not have a five year supply.

	Stepped requirement	Flat requirement
5 year housing requirement	1,220	1,490
Shortfall (plan period)	504	738
20% buffer	345	446
Total requirement	2,069	2,674
Supply	2,090	2,090
No. years of supply	5.05	3.9

13. In addition whilst the HBF has not undertaken a thorough assessment of all SHLAA sites it is noted that the Council anticipates the delivery of 1,287 units from sites which do not benefit from planning permission. This is considered overly optimistic, particularly when it is considered that it can take several years from the submission of an application to development commencing on site.

Question 13: Is a five year supply likely to be deliverable taking into account projected delivery rates and the reliance on sites without planning permission and with policy and other constraints?

14. I refer the inspector to our comments above.

Question 14: Is the requirement within Policy LIV1 for applicants to demonstrate deliverability necessary?

15. No, the HBF considers this an unduly bureaucratic process. If a developer gains planning permission and is seeking to provide policy compliant contributions there should not be a need to provide such information. The NPPF paragraph 47, footnote 11 is clear on the criteria against which sites should be considered deliverable.

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