

Date: 25 April 2013

Your ref: Our ref: JB

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Dear Ms Heywood,

Site Allocations DPD – Response to Letter received on 16 April 2013

Part 1 – Impact of the revocation of the North West Regional Spatial Strategy on the Site Allocations DPD

As you are aware the Government laid an Order before Parliament on the 24 April 2013 for the revocation of the North West Regional Strategy, effective from 20 May 2013. The ambition to revoke Regional Strategies emerged with the election of the Coalition Government in 2010. The authority has been mindful that the revocation was under consideration. However, as the strategy clearly remains part of the development plan until revocation, the authority has been required to be in conformity with it. The emergence of the National Planning Policy Framework (NPPF) in March 2012 produced another requirement on the authority to be in conformity with the plans and policies set out within the NPPF. During the examination of the Central Lancashire Core Strategy it was agreed by an independent Planning Inspector that the DPD was compliant with both the RS and the NPPF.

The Site Allocations DPD has been predicated in part on the evidence base and assumptions made through the Central Lancashire Core Strategy, RS and the NPPF. Indeed up until 24 April 2013 the authority has been bound to be in conformity with the RS, including at their recent examination in early March 2013. However, it does not automatically follow that now the RS has been revoked that the evidence base and assumptions that informed its development are no longer valid or appropriate. Indeed it is the authority's opinion that in the absence of any more appropriate or up to date evidence, then the information used to inform the RS remains the most appropriate and relevant to use.

The key area in which discussions arise in relation to the RS, and indeed the key reason for its demise was in setting housing requirement targets for local authority areas, at a regional level. The RS housing requirement for South Ribble was set at 417 dwellings per annum based on the 2006 household projections between 2006 and 2030. The most recent household projection figures are the 2011 household projections which span the time period until 2021, not a comparative time period however if we assume the levels of growth will be broadly similar we can use these for a comparison.

The 2011 household projections show 409.5 (410 rounded up) dwellings per annum, which is broadly consistent with the household projections of 2006 that were used to inform the RS. With this in mind the authority considers that this latest information does not detract from the housing requirement set out within the Central Lancashire Core Strategy and rather seeks to enforce its presence at this time. As such the authority considers that the 417 dwellings per annum over the 15 year plan period in which the Site Allocations DPD has distributed growth and allocated land is still up to date and relevant.



The authority accepts that as new evidence becomes available through the 2011 Census, updated household projections and population growth data and an updated Housing Needs Assessment, which the authority has recently commissioned, then there will be a need to review the housing requirement set out within the Central Lancashire Core Strategy. It is the authority's view that the Site Allocations DPD remains 'sound' and there are no impacts as a result of the RS revocation that would impact on the DPD and its adoption. The authority has committed to undertaking an early partial review of the Central Lancashire Core Strategy, if the evidence at this stage points to vastly different housing requirement figures then it may also be necessary to undertake a partial review of the Site Allocations DPD at that time.

One point that is worth noting is that the revocation of the RS removes the requirement for the authority to deliver its shortfall between 2003 and 2010 (prior to the Core Strategy Plan Period) which equates to 117 dwellings. Therefore, the authority now considers that its shortfall exists only from the beginning of the Core Strategy Plan Period which is 560 dwellings minus 117 dwellings which creates a new shortfall of 443 dwellings up until 2011/12 monitoring year.

The Council do not see any reason for additional modifications to the Site Allocations DPD in relation to the RS revocation.

Part 2 – Impact of the latest household projections (2011) on the Site Allocations DPD

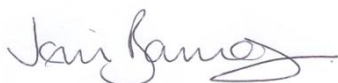
The latest 2011 based household projections provide the most up to date information for the authority to plan for future housing requirements. However, the authority does have a recently adopted Central Lancashire Core Strategy, July 2012, which sets out the housing requirement for South Ribble of which the allocations of sites within the Site Allocations DPD has been predicated upon and subject to detailed public consultation.

If we were to broadly compare the 2006 based household projections (of which the RSS housing requirement figures were informed by) and the 2011 based household projections (the most up to date information) we can see that the difference is 417 (2006) and 410 (2011) therefore broadly consistent with each other and causing minimal, if any impact on the work and evidence base of the Site Allocations DPD. This has also been detailed in our response to Part 1.

It is worth noting that the 2011 based household projections were not available until 9 March 2013, some months after the publication and later submission of the Site Allocations DPD. Whilst the authority recognises that the planning system is fluid in nature it can only make decisions based on the most up to date information and legislation available at that time. As mentioned above the authority is already committed to undertaking an early partial review of the Central Lancashire Core Strategy and as such this issue will be discussed and consulted upon within that review period.

If you have any further questions or require additional information please contact me at your earliest convenience.

Yours Sincerely,



Forward Planning
South Ribble Borough Council