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Hourigan Connolly

Chartered Town Planners

Your Ref :  
Our Ref : 2017-06-09 Ribble Valley  
Date : 9 June 2017

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HED DPD Publication Reg 19 Consultation  
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**BY EMAIL ONLY: [publicationreg19@ribblevalley.gov.uk](mailto:publicationreg19@ribblevalley.gov.uk)**

Dear Sir/Madam

**RIBBLE VALLEY BOROUGH COUNCIL: A LOCAL PLAN FOR RIBBLE VALLEY 2008-2028**

**PUBLICATION OF THE RIBBLE VALLEY HOUSING AND ECONOMIC DEVELOPMENT –  
DEVELOPMENT PLAN DOCUMENT (DPD)**

These representations are made on behalf of the Strategic Land Group (SLG). The representations relate to the Housing and Economic Development - Development Plan Document (June 2017). As the Council are aware, SLG have land interests at Clitheroe, with a recent outline planning application (all matters reserved save for means of site access) being submitted for land at Henthorn Road for residential development.

**Housing Allocations: Residual Requirements**

The HED DPD proposes to allocate further land to meet the residual housing requirements in the settlements of Mellor and Wilpshire, as measured against the overall requirement and spatial distribution of the Core Strategy and in which both are identified as Tier 1 settlements.

The HED DPD does not propose any other changes to settlement boundaries or land allocations.

Given the Council's persistent under-delivery of housing in past and recent years, it is considered inappropriate to adopt such a prescriptive stance on further allocations. By allocating additional sites, over and above the 'residual requirements' the Council will ensure flexibility and competition in the market and could adapt easily to changes in housing need.

It is asserted that the Council are unable to demonstrate a five year supply of housing land, this is clearly set out in the Planning Statement submitted to accompany the planning application relating to land at Henthorn Road, Clitheroe. However, in summary, the 20% buffer required to make up for the Council's persistent under-delivery should be applied to the five year requirement plus the shortfall figure. In our view this is the correct approach to adopt. It should be noted that such an approach does not artificially inflate the housing requirement over the current five year period and neither does it result in any double counting, it merely brings forward housing from later in the Plan period to assist the Council in meeting its requirement sooner. This interpretation is also consistent with the objective within the Framework of boosting the supply of housing and has been recently endorsed by Inspectors and the Secretary of State in numerous appeal decisions.

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The Council's latest housing land supply position, was reported to the Planning & Development Control Committee on 15 December 2016 and contends that the supply position at 30 September 2016 was 5.32 years; however if the approach adopted by the Secretary of State to the application of buffer is adopted the position is 4.99 years and that is before any interrogation of claimed deliverable sites is undertaken. On this basis, it is considered wholly appropriate for the HED DPD to propose additional allocations, or to propose amended settlement boundaries to include suitable, available and deliverable sites, should the Council find they no longer have a five year housing land supply.

In a situation where there is a deficient housing land supply position, if a site is sustainable, available and deliverable then according to Paragraph 14 of the National Planning Policy Framework, providing the benefits outweigh any harm, then there is no reason why planning permission should be withheld.

Furthermore, the Council's prescriptive approach to housing allocations, and lack of extension to Settlement Boundaries raise further concern with regard to the delivery of housing, and therefore its able to maintain a five year housing land supply in future years.

In respect of Clitheroe, the Council are heavily reliant on the Strategic Site at Standen to deliver 1040 new homes by 2028, this equates to approximately 100 dwellings a year (on the basis that no homes have yet commenced on the site at 2017). However, to date only one reserved matters application has been submitted and approved, dated 8<sup>th</sup> March 2017 (reference 3/2016/0324) for the first phase of development, 228 units. This reserved matters consent is subject to a number of conditions, including a pre-commencement condition, there is therefore even further work to be done before development can commence. The level of delivery over the next five years will therefore be limited.

By our estimates and experience the first phase of development is likely to deliver (realistically) on average 40 dwellings per annum, at this rate of development this would equate to 880 units in the plan period even if the delivery were to step up to 100 dwellings per annum on the site thereafter (with later phases of development). This would leave a shortfall of housing in Clitheroe alone of approximately 160 dwellings (circa. 7% of its overall minimum requirement). That approximation is likely to underestimate the eventual shortfall in delivery as it is considered that a delivery rate of 100 units per annum is overly ambitious and unrealistic in any event.

There is recent evidence and research to demonstrate that large scale sites have significant lead in times and delivery is therefore affected. Research by NLP (November 2016) confirms that on average the lead in time for large sites prior to the submission of even the first planning application is 3.9 years, with the planning approval period on average being 6.1 years for schemes of 2,000+ dwellings. This NLP report follows on from a national study undertaken by Hourigan Connolly in February 2014, commissioned by Gladman Developments Limited, which was based upon empirical evidence from LPAs that an 8-year period should be allowed for the delivery of homes on Strategic Urban Extension sites to allow for local plans to be in place and adopted.

On this basis, it is suggested that the Council should propose further sustainable allocations, or sustainable amendments to Settlement Boundaries to enable additional sites to come forward in the absence or delay to delivery elsewhere in the Borough.

#### **Land at Henthorn Road, Clitheroe**

As noted previously, a planning application has been submitted to the LPA in relation to this site, it is demonstrated clearly therein that this site comprises a sustainable development site, with good access to services and no technical constraints to development. Clitheroe is a key focus for development, however this site falls within the open countryside at present. It is requested that this site is allocated in the HED DPD as an additional, sustainable housing allocation to ensure flexibility in the plan.

The housing requirements contained in the Core Strategy are minimums, there is no reason why allowing further housing to be delivered in sustainable locations should be prevented. The decision to include or exclude a site from the settlement boundary should be based solely on the characteristics of the site.

This accords with the principles established in a number of recent appeal decisions<sup>1</sup> which confirm that, in

<sup>1</sup> Land at Hill Top Farm, Northwich (PINS Ref: APP/A0665/W/14/3000528); Land at Fountain Lane, Davenham (PINS Ref: APP/AO665/A/14/2226994) and; Land to the east of Broad Marston Road, Mickelton (PINS Ref: APP/F1610/A/14/22288762)

any event, the location of a site beyond a settlement boundary should not be a determinative factor for a planning application on an otherwise sustainable site, even when an adequate supply of housing land can be demonstrated.

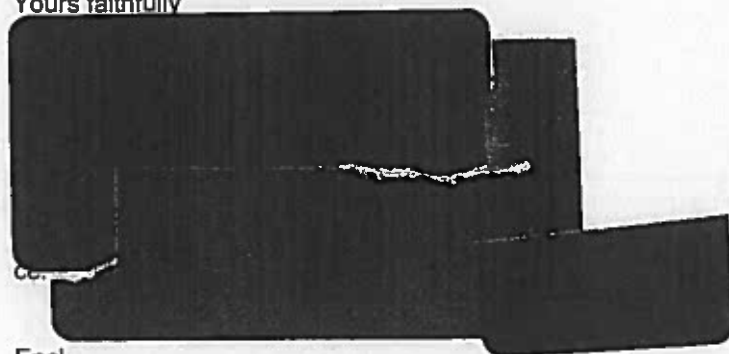
It is clear the site at Henthorn Road does not warrant the designation of open countryside. Including it within the settlement boundary would not change the character of the wider area and would not be harmful to views of and through the countryside.

**Summary**

Whilst SLG support the HED DPD and its aim to meet residual housing needs, we do not believe it goes far enough to ensure sustainable and positive development. The HED DPD only seeks to allocate two small sites in the settlements of Mellor and Wilpshire, although these are locations where a residual requirement has been identified, it is considered that a more widespread strategy should be adopted.

It is respectfully requested therefore that the Council revisit their identification of settlement boundaries and their site allocations, to enable more flexibility and further sites to come forward, subject to them meeting the presumption in favour of sustainable development.

Yours faithfully

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Encl.

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