

Response to Inspector's main issues and questions re RVBC HEDDPD EiP

Hearing Statement on behalf of the Trustees of Hammond Ground

We have acted on behalf of the Trustees of Hammond Ground throughout this HEDDPD process and have made representations which are still part of our case and to which the Inspector's attention is directed. In regard to the EiP Dickman Associates Limited will be responding to Issue 1 question e) and Issue 2 questions e) & f) on behalf of the Trustees of Hammond Ground (see below) and Emery Planning will be responding on Issue 2 questions a), b) and c) – see separate attached statement and appendices.

We are also appointed by our clients in regard to a current planning appeal due to be heard at inquiry in May 2018 for residential development on their land.

Issue 1 Question e)

How have the Housing Needs Assessment and Economic Strategy which formed part of the Core Strategy evidence base informed this DPD?

Both the SHMA and the employment land document date from 2013 and no updates have been forthcoming as part of this process. This is a fundamental problem for the soundness of the plan.

The SHMA provides a borough wide assessment of the housing and affordable requirements. RVBC have then undertaken some housing needs assessments for some of their settlements which seems to have been selected in an entirely random ad hoc fashion in terms of the date they were undertaken. Thus, the settlements selected bear no resemblance to the settlement strategy in DS1 of the CS. So, for example Tier 2 settlements like Tosside has an assessment, but a Tier 1 settlement like Read/Simonstone did not.

RVBC is characterised by an aging population and is also an area of high income households with many residents out commuting to Preston, Blackburn, Skipton, Manchester etc.

Clitheroe is identified as a principal settlement and has understandably been allocated the largest proportion of housing including the strategic site at Standen but in the CS Clitheroe has no new employment land allocations. Longridge fairs better getting both housing and employment allocations but there is nothing to demonstrate any connectivity of the SHMA and Economic Strategy documents to the CS and the HEDDPD.

In regard to Tier 1 sustainable settlements - Read/Simonstone has one of the larger existing employment areas in the borough and indeed has a further small proposed employment allocation(0.8ha) but the housing allocation for Read/Simonstone in the CS was only 45 for the entire CS plan period. RVBC have advised us in relation to our clients site which is currently the subject of an appeal that the housing requirements for Read/Simonstone set out in DS1 have now been met through other consents. This means that the figures in the CS are being wrongly treated as absolute and thus not in line with NPPF requirement for them to be minima.

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Issue 2 question e)

Are Housing Allocation Policies HAL1 and HAL2 clear on what will and will not be permitted – for example housing numbers, tenure mix?

No. The DPD provides no such information. Housing Allocation Policy (HAL) in its wording of the 'Justification' section seems to reaffirm the fact that the 5600 dwellings over the CS and 280dpa are being interpreted by RVBC as absolutes not minima.

Regarding HAL1 (Mellor) no actual numbers for the site are identified just a comment that the site would be very high density, or it may be too small, and it implies the likelihood is other land in Mellor will be needed to meet the 18 unit target. There is no detail of dwelling type, or tenure mix other than to include some affordable and be in line with CS policies H3 and DMH1. In addition, a well used footpath presently crosses the site, which will need to be accommodated within a suitable landscape corridor which will further reduce the site's yield.

For HAL2 various site constraints are listed but no other detail is provided in regard to house types, mix, tenure, affordability, phasing of the scheme, how and when the various site constraints will be addressed, delivery, or build out rates and when this site will start to contribute toward the housing supply. Given the amount of work required this site is unlikely to come forward quickly, yet the 32 units is a current requirement. At Reg 18 stage as 'Wilpshire 3' now known as HAL2 could accommodate 227 units yet if the Council interpretation and approach elsewhere is applied then Wilpshire only had a requirement for 34 units which has now reduced to 32 units. The distribution of land therefore seems seriously imbalanced to the detriment of other Tier 1 settlements e.g. Read/Simonstone.

Issue 2 question f)

Is the proposed monitoring likely to be adequate and what steps will be taken if sites do not come forward?

No specific information has yet been provided by RVBC on this. Should that information be forthcoming in their responses to the Inspector's questions which they are due to submit the week after all other parties have to respond then we reserve the right to add further to our replies.

On the information that has been publicly available i.e. the 6 monthly HLS updates. These have shown no significant level of delivery and generally there is been persistent under delivery in RVBC.

There is no flexibility and no alternatives if these sites are either delayed or do not come forward other than through the application and appeal process.

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