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11 June 2018

EP ref: 17-282

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By e-mail only to: [programme.officer@ribblevalley.gov.uk](mailto:programme.officer@ribblevalley.gov.uk)

Dear Mrs Haworth

Re: Ribble Valley Borough Council's Housing and Economic Development DPD  
(HED DPD)

As you and the Inspector are aware, along with Dickman Associates Ltd we act on behalf of the Trustees of the Hammond Ground whose interests relate to land at Hammond Ground, Whalley Road, Read. We will be attending the examination hearing session(s) on behalf of our client in relation to Issue 2: Housing. We write to set out our concerns in relation to the programme for the forthcoming examination hearing sessions.

On 25<sup>th</sup> May 2018, the Council's website was updated to explain that the Inspector has now set the following dates for the examination hearing sessions: 3<sup>rd</sup>-5<sup>th</sup>, 17<sup>th</sup> and 18<sup>th</sup> July AM. As far as we are aware, the Inspector has not asked for any additional hearing statements from the Council and / or other participants.

You will recall that on 8<sup>th</sup> December 2017, we submitted a hearing statement on behalf of our client in response to the Inspector's Main Issues and Questions set out in the letter of 2<sup>nd</sup> November 2017. Our statement responded to the following questions asked by the Inspector:

- a) Is the amount of land allocated for housing sufficient to meet the CS requirements?



- b) Is there a housing trajectory for the delivery of housing on the strategic site and the principal settlements? 1040 dwellings are identified for Standen over the plan period where will the remainder of the housing requirement be provided?
- c) Will the distribution, capacity and speed of deliverability (with regard to viability and infrastructure) of the sites, including those allocated in the DPD and the Standen strategic site, satisfy the provision of a 5 year housing land supply?

In response to all three of these questions, our statement referred to the Council's latest Housing Land Availability Schedule (HLAS), which was published in November and has a base date of 30<sup>th</sup> September 2017. However, our understanding is that the Council now intends to publish a revised HLAS (base date 1<sup>st</sup> April 2018) before the examination hearing sessions are due to commence and a draft version is to be presented to members of the Council's Planning and Development Committee on 28<sup>th</sup> June 2018. If the Council then chooses to submit the new HLAS to the examination, we will not have an opportunity to review it and update our hearing statement to reflect the latest position before the hearing sessions commence. The Inspector will only have our hearing statement from December 2017, which was based on the previous HLAS yet the Council will be relying on an updated position.

The Inspector will be familiar with paragraph 3-033 of the PPG: "Updating evidence on the supply of specific deliverable sites sufficient to provide 5 years worth of housing against housing requirements", which states:

*"Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The examination of Local Plans is intended to ensure that up-to-date housing requirements and the deliverability of sites to meet a 5 year supply will have been thoroughly considered and examined prior to adoption, in a way that cannot be replicated in the course of determining individual applications and appeals where only the applicant's/appellant's evidence is likely to be presented to contest an authority's position.*

*The National Planning Policy Framework requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of housing. As part of this, local planning authorities should consider both the delivery of sites against the forecast trajectory and also the deliverability of all the sites in the 5 year supply.*

*Local planning authorities should ensure that they carry out their annual assessment in a robust and timely fashion, based on up-to-date and sound evidence, taking into account the anticipated trajectory of housing delivery, and consideration of associated risks, and an assessment of the local delivery record. Such assessment, including the evidence used, should be realistic and made publicly available in an accessible format. Once published, such assessments should normally not need to be updated for a full 12 months unless significant new evidence comes to light or the local authority wishes to update its assessment earlier.*

*By taking a thorough approach on an annual basis, local planning authorities will be in a strong position to demonstrate a robust 5 year supply of sites. Demonstration of a 5 year supply is a key material consideration when determining housing applications and appeals. As set out in the National Planning Policy Framework, a 5 year supply is also central to demonstrating that relevant policies for the supply of housing are up-to-date in applying the presumption in favour of sustainable development. (our emphasis)*

Consequently, given the Inspector's questions and the expectation set out in the PPG that the examination of the Local Plan will thoroughly consider and examine the Council's housing land supply position, we request the opportunity to submit a revised hearing statement in relation to the new HLAS once this has been published. We raise our concern now as this will have implications for the timing of the hearings.

We would be grateful if you would pass this letter to the Inspector for his attention.

Yours sincerely  
Emery Planning

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**Associate Director**

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