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Programme Officer
HEDDPD
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

11.1.19

Dear Sirs,

**Representations to Ribble Valley BC Housing and Employment Development
DPD (HED DPD) housing position statement 5.12.18 on behalf of The
Huntroyde Estate**

We act for the Trustees of the Huntroyde Estate and have been instructed to make representations on their behalf to the housing position statement RVBC produced on 5.12.18. We confirm our clients' landholdings remain unchanged from our previous representations on consultations to this Plan and we ask that those earlier written comments are given due consideration in the Inspector's deliberations. The comments herein relate to this further additional document and should be considered in the suite of representations we have made.

Our contact details and those of our client remain as advised in previous representations on the RVBC HEDDPD. All correspondence on these representations should be addressed to us at Dickman Associates Ltd.

The HEDDPD was submitted to the Secretary of State before 24.1.19. Appendix 1 of NPPF 2018 sets out the implementation and transition arrangements and this confirms that the NPPF2012 is the applicable document against which this Plan should be assessed.

NPPF2012 requires any housing supply backlog to be made up over the plan period and if the council has a persistent backlog of supply that shortfall should be made up in the immediate next 5 years (Sedgefield method). Whilst some progress in delivery of housing has been made in RVBC over the last 3 years there is still a significant shortfall of about 600 units (i.e. over 2 years supply) which needs to be addressed.

NPPF2012 notes at paragraph 47 that a record of persistent under delivery of housing means the 20% buffer should be applied, therefore we do not agree with the approach RVBC are now alleging they are a 5% authority.

Para 47 NPPF2012 also requires Councils to identify a supply of specifically developable sites over the 0-5;6-10 and 11-15year time periods of the plan. The

CHARTERED TOWN PLANNER

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HEDDPD only focusses on the next 5 years and nothing thereafter. The Adopted RVBC Core Strategy (RVCS) end date is 2028. Therefore, the last 5 years of the plan's housing supply and site allocations is untouched by the HEDDPD.

The housing position statement avoids giving clarity and still avoids providing a response on what constituted the 'site selection criteria' for the proposed main modifications. As previously, stated we were contacted early summer 2018 by email asking if 2 of our client's sites (Chatburn Rd, Clitheroe and Haugh Head, Simonstone) were still available. At the time we asked why the LPA were only seeking more information on these 2 sites and none of the other sites we had submitted and also the basis for the request. The response was we could complete forms for all the sites, but no site selection criteria were given. That question remains unanswered, even in the most recent position statement. In the report to the special planning committee of 17.7.18 it seems that small/medium size housing sites in the 3 main towns and Tier 1 settlements to provide sites for the 0-5year timeframe was the criteria but this can only be surmised as it is unconfirmed.

In any case the councillor discussion at committee paid no heed to any planning policy site selection criteria that might have been applied by the officers when proposing Highmoor Farm be moved from a 'Tranche 2 site' to the 0-5year timeframe. Thus, undermining any presumed criteria for 0-5years and also deleting any 6-10year 'prospects'. (See Minute 170 of the Special Planning Committee 17.7.18)

We raise various comments arising from the position statement.

To clarify para 6.9 of the Position Statement no evidence was presented to the appeal inspector at Hammond Ground on 5HLS because it had been discussed outside the Hearing and a Statement of Common Ground dated 10.10.18 (see attached). In the appeal decision (which is now a core document for this EiP) at para 49 the Inspector assumed the 3.86 years as the worst case for assessing the planning balance. In less than 2 months the council argue they have a 6.1year supply at 5% buffer. Even taking their 4.9year (at 5%) figure at the time of the appeal a 1.2year increase seems remarkable in such a short time period.

The RVCS predicted 100 dpa for Standen from 2016/17 onwards. The latest predictions for Standen indicate that the first units for occupation on the site will equate to 50 this year (2018/19) and next (2019/20) as indicated in Table 2 to the position statement and no mention is made that the Standen S106 Schedule 3 notes that no more than 50 dwellings can be occupied without the location of the primary school having been confirmed. Can RVBC confirm whether or not this has now been done? It seems that not only has this site delivered later than planned but also fewer dpa. In fact, over the next 5 years at no time do Standen Phases 1&2 reach the anticipated 100dpa as stated in the RVCS in fact even now the maximum dpa off Standen is 68 units being predicted for 2020/21. The reliance on the strategic site to address the housing supply in RVBC continues to be over-estimated.

The delivery rate of 50 dpa exceeds the delivery rates thus far achieved on a variety of larger sites across the borough where there is only one housebuilder on site. On the other larger sites, the delivery rate is 25- 30dpa which is a more realistic rate. We

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note in Table 2 of the housing position statement that at Waddington Rd, Clitheroe 50 dpa is also being proposed but on that site, there are 2 housebuilders involved.

The list at Appendix 3 refers to 33 alternative potential allocation options but only lists 32 (No 12 is missing); it also still incorrectly shows the Hammond Ground site area as 20.06 ha rather than 4.09ha!

Our clients' previous responses and justification on their sites which are selected sites have remained ignored. For clarification there is justified reason why the whole of our clients' Chatburn Rd site should not be developed. The fact that mitigation to address any flood issues can be put in place does not seem to have been taken into account. The fact our clients have proposed their site at Haugh Head for the 6-10year time frame but with the possibility to come forward slightly sooner if required has also been ignored.

We welcome and strongly support the allocation of our clients' 2 sites.

Finally, para 9.1 of the Council's Housing Position Statement seems somewhat dismissive of the current process stating '...in any event the council will be undertaking a review of the Core Strategy during 2019 a part of the required review process which will provide the most appropriate opportunity to make any adjustments to housing delivery...'. RVCS was adopted in 2014. In fact, it is a legal requirement for all local plans to be reviewed at least every 5 years. (para 33 of NPPF2018 and its footnote 18).

Yours faithfully

Dickman Associates Ltd

Enc. socg 10.10.18

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PINS Ref: APP/T2350/W/17/3185445

LPA Ref: 3/2016/1192

**APPEAL BY THE TRUSTEES OF
HAMMOND GROUND
AGAINST THE REFUSAL BY
RIBBLE VALLEY BOROUGH COUNCIL TO GRANT OUTLINE PLANNING
PERMISSION FOR RESIDENTIAL DEVELOPMENT FOR 50 UNITS
INCLUDING RESERVED MATTERS FOR ACCESS
AT HAMMOND GROUND, WHALLEY ROAD, READ**

SECOND SUPPLEMENTAL


STATEMENT OF COMMON GROUND

BETWEEN

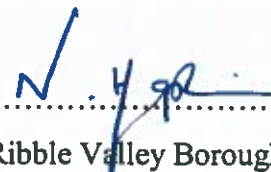
**RIBBLE VALLEY BOROUGH COUNCIL
AND THE TRUSTEES OF HAMMOND GROUND**

10th OCTOBER 2018

1. Based on a housing requirement of 280 no. dwellings p.a. and a backlog of 592 dwellings to be addressed in full in the five period (i.e. the Sedgefield method), the total five year requirement equates to 1,992 dwellings (i.e. 1,400 + 592).
2. The LPA consider that appropriate buffer should be 5%, the Appellant consider that it should be 20%.
3. The LPA consider that the supply is 2057. The Appellant considers that the supply is 1847
4. The LPA consider that as at 1st July 2018 the supply is 4.9 years (5% buffer) & 4.3 (20% buffer).
5. The Appellant considers that the supply is 3.86 years (20% buffer) & 4.41 (5% buffer).

Signed.....
On behalf of the Trustees of the Hammond Ground

Date.....10.10.18.....

Signed.....
On behalf of Ribble Valley Borough Council

Date.....10.10.18.....