

Mrs Michelle Haworth
Examination Office
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA

1 – 4 South Park Court
Hobson Street
Macclesfield
Cheshire
SK11 8BS

T: 01625 433881
F: 01625 511457

info@emeryplanning.com
www.emeryplanning.com

29 January 2019

EP ref: 18-582

Ben Pycroft
T: 01625 442 799
benpycroft@emeryplanning.com

By e-mail only to: programme.officer@ribblevalley.gov.uk

Dear Mrs Haworth

Re: RVBC – Housing and Economic Development DPD

Emery Planning is instructed by Hallam Land Management to respond to the Council's note to the Inspector regarding planning approvals. The Inspector will recall that the Council's case is that no further housing allocations are required in the HED DPD to provide additional flexibility because the Core Strategy policies (namely DS1 – "Development Strategy", DMG2 – "Strategic Considerations" and DMH3 – "Dwellings in the Open Countryside and the AONB") allow residential development on the edge of the principal settlements of Clitheroe, Longridge and Whalley and the Tier 1 villages (including Langho) so long as the site is closely related to the main built up area and would consolidate, expand or round-off development and be of a scale in keeping with the existing settlement. The Council has subsequently produced a list of 8 sites (which we have listed a to h) to demonstrate that it has granted planning permission in such locations despite the Council claiming it could demonstrate a five year housing land supply at the time applications were determined. We comment on the sites as follows.

a) 3/2014/0764 – Chipping Lane, Longridge (363 dwellings)

Outline planning permission was granted at this site at a time when the Core Strategy had been adopted and the Council claimed it could demonstrate a 5.59 year supply. However, the officer's report to committee explained that at the time the application was determined, there was a residual requirement for Longridge (against the figures set out in



the table below paragraph 4.12 of the Core Strategy) of 438 dwellings, which the proposal would address.

b) 3/2015/0715 – Oakhill College, Whalley (6 units)

This application was approved under delegated powers. The officer's report explains that at the point of determination there was a shortfall in the housing supply for Whalley (when measured against the figures as set out in the table below paragraph 4.12 of the Core Strategy).

c) 3/2015/0065 – Dilworth Lane, Longridge (195 dwellings)

Outline planning permission was granted at this site at a time when the Core Strategy had been adopted and the Council claimed it could demonstrate a 5.54 year supply. However, the officer's report to committee explained that at the time the application was determined, there was a residual requirement for Longridge (against the figures set out in the table below paragraph 4.12 of the Core Strategy) of 629 dwellings, which the proposal would help address.

d) 3/2016/0146 – Old Row, Barrow (23 dwellings)

The site already had outline planning permission for 23 no. dwellings (LPA ref: 3/2012/0623 approved February 2013) and the site was therefore already included in the housing commitment figures for Barrow at the time the Core Strategy was examined.

e) 3/2017/0433 – Henthorn Road, Clitheroe (24 dwellings)

Outline planning permission was granted at a time when the Council claimed it could demonstrate a 5.73 year supply and that the requirement for Clitheroe had been met. However, the committee report stated:

"it is not considered that the degree of additional oversupply, as a result of the proposal, would result in any significant or measurable harm to the Development Strategy for the Borough"

f) 3/2018/0910 – Sheepfold, Barrow (26 dwellings)

The officer's report to committee explained that at the time this application was determined there was a residual requirement of 43 dwellings for Barrow (when measured against the figures as set out in the table below paragraph 4.12 of the Core Strategy).

g) 3/2018/0844 – Longsight Road, Langho (42 dwellings – increase of 24 dwellings compared to the existing permission)

This site already had planning permission for 18 dwellings (LPA refs: 3/2015/0010 and 3/2018/0392). The Inspector will already be aware that the proposed settlement boundary of Langho is to be amended to include this site and that the Council gives significant weight to the draft proposals map for development management purposes. Therefore, at the point of determination, it was already within the settlement boundary and we do not consider that it is comparable for the purposes of this exercise.

h) 3/2018/0688 – Henthorn Road, Clitheroe (110 dwellings)

Outline planning permission was refused at this site on highway grounds contrary to officer recommendation and therefore it does not support the Council's proposition that it approves planning permission on sites located on the edge of settlements even when it claims it can demonstrate a five year supply of housing.

As can be seen from our comments above, sites d) and g) should not have been included in the Council's list as these sites already had planning permission. Site h) should not have been included in the list because planning permission was refused. In the case of sites a), b), c) and f), planning

permission was approved on these sites because there was a residual housing requirement that needed to be addressed in those particular settlements at the time applications were determined. In our view, none of these sites support the Council's case because where there is no residual requirement in a particular settlement, planning permission has been refused. For example, a planning application for up to 123 dwellings on land at 74 Higher Road, Longridge (LPA ref: 3/2016/1082) was refused (contrary to officer recommendation) for the following reason:

"The proposal is considered to be contrary to Key Statement DS1 and DS2 and Policy DMG2 of the Ribble Valley Core Strategy in that the proposal would lead to a level of development that exceeds the anticipated level of housing development embodied within the Ribble Valley Core Strategy in terms of the planned residual need for the settlement of Longridge and as a consequence the planned levels of housing development across the Borough. It is further considered that the level of over-supply of housing, as a result of the proposed development would undermine the Development Strategy for the Borough which seeks to critically establish both the pattern and intended scale of development in relation to housing numbers in order to achieve a sustainable pattern of development across the Borough for the duration of the plan period."

As the Inspector is aware, an appeal against the Council's decision was made by VH Land Partnership, which was allowed on 17th April 2018. The appeal decision is appended to our additional hearing statement at EP3.

The only site therefore where planning permission has been granted after the Core Strategy was adopted (in December 2014) and at a time when the Council claimed it could demonstrate a five year housing land supply and also considered that the residual requirement of the settlement had been met was at Henthorn Road where just 24 dwellings were approved.

In conclusion, the Council's note demonstrates that insufficient sites have been granted planning permission under the Core Strategy policies DS1, DMG2 and DMH3 to conclude that flexibility will be provided through further approvals on such sites in the future. We maintain that additional sites should be allocated in the HED DPD to ensure that the housing requirement is achieved. As the Inspector is aware from our additional hearing statement (paragraphs 3.34 to 3.37 on page 12), we conclude that land for 651 dwellings should be identified and sites should be allocated through the HED DPD, including our client's site at Langho.

Yours sincerely
Emery Planning

Ben Pycroft

Ben Pycroft BA (Hons), DIP TP, MRTPI
Associate Director