

**EXAMINATION OF THE RIBBLE VALLEY HOUSING AND  
ECONOMIC DEVELOPMENT, DEVELOPMENT PLAN DOCUMENT  
(HED DPD)  
RESPONSE TO THE EXAMINATION DOCUMENT POST 2.33**

January 2019

## PWA PLANNING STATEMENT

- 1.1. PWA Planning is retained by Andrew Billington in respect of land at The Stables, Chaigley Road, Longridge, PR3 3TQ ('the site'). The site is currently the subject of an outline planning application for up to 10 no. self-build dwellings ('the proposed development') (planning application ref. 3/2018/0507).
- 1.2. It is a requirement of the emerging Housing and Economic Development Development Plan Document (HED DPD) that it is able to meet in full the housing, employment and other identified needs of the Borough during the plan period. This needs to be achieved through its policies and particularly its land use allocations, including settlement boundaries. We believe that the approach taken by the Council is unsound, as it will not be effective in delivering sufficient development to meet the future needs of the borough.
- 1.3. This statement responds to the examination document POST 2.33, that relates to evidence provided by the Council of planning approvals on sites outside of the settlement boundary when the Council have had a 5-year housing land supply. The list of approvals seeks to demonstrate that the flexibility required to provide the minimum housing of 5,600 dwellings across the Core Strategy plan period will be provided for by the policies within the Core Strategy, and not via further site allocations within the HED DPD. The matter goes to the heart of the objections submitted by PWA Planning throughout the HED DPD plan writing procedure. This includes objections raised at Regulation 18, 19 and 22, and within examination documents POST 3.10 and 3.18. As set out within PWA's other submission documents to this examination, and without reiterating the well-rehearsed previously submitted comments, what is committed is not always delivered in full. In this respect, there continues to be minimal flexibility in the plan based on the anticipated housing trajectory within the Housing Position Paper (POST 2.30).
- 1.4. The table provided by the Council (POST 2.33), includes eight applications that were recommended for approval by the Council's planning officers to planning committee since the adoption of the Core Strategy on 16<sup>th</sup> December 2014. Seven of these were approved by the planning committee, however, the last application (ref. 3/2018/0688) was recommended for approval but refused by the planning committee. A brief assessment of the eight applications is included in the subsequent text.
- 1.5. **Ref. 3/2014/0764: Chipping Lane, Longridge.** The application was approved for 363 dwellings, however, as discussed at the examination, and included within PWA's comments to the Council's housing position statement (POST 3.18), the final anticipated numbers for the built development are anticipated to be 55 dwellings less than this.
- 1.6. **Ref. 3/2015/0715: Oakhill College, Whalley.** No comments to make.
- 1.7. **Ref. 3/2015/0065: Dilworth Lane, Longridge.** No comments to make.
- 1.8. **Ref. 3/2016/0146: Old Row Barrow.** The application provided approval for 26 dwellings. However, Paragraph 5.1.3 of the committee report provides the details for the approval:

*'It is recognised that there is a large number of existing housing commitments in Barrow, therefore there is no residual need for additional housing in this settlement. However, the site has a historic consent (2013) and the 23 dwellings previously approved on the site have already been included in the list of commitments when the development strategy was refined and adopted in 2014. The proposed development would not result in a net increase in dwellings beyond those already committed and accounted for in Barrow.'*

1.9. As such, this application was clearly recommended and approved on the basis of the previous planning approval prior to the adoption of the Core Strategy and was not approved on the basis of Council's Core Strategy policies.

1.10. **Ref. 3/2019/0433:** Henthorn Road, Clitheroe. No comments to make.

1.11. **Ref. 3/2018/0910:** Sheepfold, Barrow. The description of the development was *'Application For Outline Consent For 20 Bungalows For The Elderly (6 Detached Two-Bed And 14 Semi-Detached One-Bed And Of Which Two Are Affordable) And 6 Affordable, Two-Bed Apartments With Associated Roads, Ancillary Works Landscaping And Access At Land Off Sheepfold Crescent, Barrow BB7 9XR'*. The development as such was not in relation to market housing. This is further supplemented by Paragraphs 5.1.16 and 5.1.17 of the committee report:

*'Taking into account the current supply position, the proposals proximity to a Tier 1 settlement, the unmet residual housing requirement for Barrow and that the proposal brings forward specialist open-market over 55's housing (for which there is an identified demand/need in the borough) and also brings forward affordable housing I can only consider that the benefits of granting consent significantly outweigh any harm that would likely be brought forward by the proposal.'*

*As such and notwithstanding conflicts with selected policies within the Core Strategy, I consider that the principle of the development is acceptable given the likely long-term benefits of boosting housing supply and the delivery of specialist and affordable housing.'*

1.12. In this respect it is also clear that the approval was not made on the basis of policies within the Council's Core Strategy.

1.13. **Ref. 3/2018/0844:** Longsight Road, Langho. The committee report states within Paragraph 6.1 and 6.2:

*'The application site is considered to be sustainable location, within the Draft Settlement Boundary of Langho and the principle of residential development on this site has already been accepted, hence the site be allocated as a committed housing site on the draft proposals map. It is not considered that the uplift in housing numbers (additional 24 dwellings) would cause significant harm to the development strategy and conforms with national policies which seek to make effective use of land for housing.'*

*'The proposal will contribute towards the supply of housing within the borough, and in particular contribute towards the provision of over 55s accommodation (by way of eight bungalows) and affordable housing. Statutory consultees have raised no objection to this application and it is*

*considered that the layout/design would share an acceptable relationship with surrounding land uses.*

*As such, in accordance with paragraph 11 of the NPPF, which states that planning permission should be granted unless the adverse impacts of this proposal would significantly and demonstrably outweigh the benefits, the application for residential development on this allocated housing site is considered to be acceptable.'*

1.14. The committee report provides clear evidence that the approval was on the basis of material considerations (the proposed settlement boundary amendments for Langho within the emerging HED DPD, and Paragraph 11 of the NPPF), and not the Core Strategy policies.

1.15. **Ref. 3/2018/0688:** Henthorn Road, Clitheroe. The application for 110 dwellings went to two planning committees, as such there are two committee reports. However, the conclusions, within Paragraph 6.1 of both reports is the same:

*'The application site is considered to be sustainable location, adjoining the Draft Settlement Boundary of Clitheroe, and the proposal will contribute towards the supply of housing within the borough, and in particular contribute towards the provision of over 55s accommodation and affordable housing. Statutory consultees have raised no objection to this application and therefore in accordance with paragraph 11 of the NPPF, which states that planning permission should be granted unless the adverse impacts of this proposal would significantly and demonstrably outweigh the benefits, the outline planning application for residential development, with all matters reserved except for access, is considered to be acceptable.'*

1.16. Again, it is clear the recommendation was made on the basis of Paragraph 11 of the NPPF. This is supplemented in the first of these reports (dated 1<sup>st</sup> November 2018), in which the Council acknowledge that they do not have a five-year supply within Paragraph 5.1.12, however this paragraph was removed from the second committee report, though the recommendation was still made on Paragraph 11 and not compliance with the Council's Core Strategy policies:

*'In addition to the above, the Council's most recent published Housing Land Availability Survey (at 30th June 2018) provides the most up to date baseline for establishing five-year supply. In the light of the Governments subsequent guidance the Council has re-assessed its supply position in the course of dealing with a recent Planning Appeal and has determined that the five-year supply of housing for the borough is 4.9 years (using a 5% buffer). As such the Council cannot presently demonstrate a five-year housing supply. In such circumstances (as detailed within Para 11 and footnote 7 on page 6 of the NPPF) the Council's development plan policies are considered to be out-of-date and therefore the NPPF requires the Council apply the titled balance contained within paragraph 11 of the NPPF when determining proposal, and this states planning permission should be granted unless...'*

1.17. On the basis of the above assessment, 190 of the dwellings included on the approval list can be removed from the table. Furthermore, the Chipping Lane site is likely to now yield just 308 dwellings, leaving the total approved by the Council, dependent on their Core Strategy policies at 534. However, it is well documented from discussions at the Examination in Public, but also with POST 2.30 that the Council have constantly fluctuated between being able to demonstrate 5-year housing supply over the past year, and yet the more recent applications listed with POST 2.33 have not

replied upon the Council's Core Strategy policies to provide approval, rather Paragraph 11 of the NPPF. This acts as a clear indication that the Council's policies do not provide the flexibility to ensure the minimum housing numbers within the Council's Core Strategy.

- 1.18. In order to rectify this situation, and to ensure the Core Strategy can meet its housing numbers over the course of the plan period, it is requested that additional residential allocations are made, such as the land at The Stables, Chaigley Road (planning application ref. 3/2018/0507). Such allocations should then be reflected within HED DPD and the settlement boundaries on the Proposals Map. Furthermore, a new Call for Sites should be undertaken to address previous concerns raised by PWA Planning submitted under the Regulation 19 consultation (that the plan is unsound as it has not been objectively assessed against reasonable alternatives, on the basis of the original consultation focussed on a limited number of settlements and not the wider borough, and that the main modifications are now being submitted under the guise of flexibility for the plan period housing numbers, and as such the methodology to select the rejected sites at the original Call for Sites Consultation, and Regulation 19, is unsound).