



GL Hearn

Part of Capita Real Estate

**Response to Proposed
Main Modifications:
Additional Housing
Allocations
L.H.S. Properties Ltd**

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1 RESPONSE TO PROPOSED MAIN MODIFICATIONS: ADDITIONAL HOUSING ALLOCATIONS

- 1.1 This Statement is prepared to assist the Inspector with the Ribble Valley Housing and Economic Development DPD (HED DPD). This should be read in conjunction with GL Hearn's responses prepared on behalf of L.H.S Properties Ltd (hereafter called LHS.) to the previous consultations on the DPD.
- 1.2 The HED DPD was submitted for Examination in Public (EIP) by the Planning Inspectorate in August 2017. Within it were housing land allocations in Wilpshire (HAL2) and Mellor (HAL1), the only settlements at that time which appeared to require allocations to meet planned requirements. The DPD was submitted on the basis that the Core Strategy's overall Borough-wide requirement for housing at the time, and specific distribution to individual settlements as set out in Core Strategy Key Statement DS1 had been addressed through extensive commitments.
- 1.3 In preparing for the Examination in Public and to respond to issues arising regarding land supply, the Council undertook a consultation on additional sites to be proposed as main modifications in July 2018. The Council subsequently revised its Housing Land Supply Evidence (September 2018). The previous additional sites consultation was predicated upon the need to ensure sufficient land to meet a 5 year housing land supply.
- 1.4 The Council entered the EiP Hearings claiming a 5 year supply of housing as required by Government Guidance. There was significant debate at the EiP around the Council's housing land supply position, the sites identified to deliver the Local Plan Strategy, including the affordable housing requirement.
- 1.5 The Council also tried to demonstrate that there was sufficient 'flexibility' in the supply of housing land. It was explained at the EiP and subsequently through Post 2.33 that this would partly be achieved by flexible policies in the Core Strategy that enable development to be brought forward in a sustainable manner. Consequently the Council is proposing a number of additional sites be allocated to allow additional 'flexibility'.
- 1.6 L.H.S' comments on the Main Modifications: Additional Housing Allocations are set out below.

Introduction

- 1.7 It is noted that the number and location of sites that are being put forward has not altered from those that were consulted upon in July 2018.

- 1.8 Para 8.12 of the Position Statement (Post 2.30) identifies that to address the *“Borough-wide housing land need, as opposed to the previous residual requirements in Wiltshire and Mellor... set out in the Submission Version, it was decided to seek additional allocations to be considered as possible Main Modifications”*.
- 1.9 At the original Hearing Session the parties in attendance requested further clarification on the site selection process and any details of a supporting sustainability appraisal which informed the site selection.
- 1.10 It was discussed extensively at the EiP about the Council's claimed housing supply. Initial calculations ranged from 4.3 years supply (using the correct 20% buffer) to 4.9 year supply (using a 5 % buffer). This was evidenced through various oral submission which identified various issues with ransom positions, infrastructure delivery on sites delaying delivery, overly optimistic delivery rates and the absence of actual developer intentions on sites (as required by the 2019 PPG). Essentially to maintain a robust five year housing land supply it was identified that 651 dwellings needed to be identified to address the Council's five year housing land supply position.
- 1.11 The Council was claiming up to 6.1 years supply, which begged the question at the EiP, why did it need additional sites? The answer at the EiP appeared to be 'flexibility' and this was demonstrated through additional Post 2.33 and appears to be supported by the last paragraph on pg 3 of the Additional Housing Allocations consultation document.
- 1.12 It is noted that there are a number of issues raised by numerous parties to Post 2.33, all claiming that the policy mechanism identified by RVBC to provide 'flexibility', is not supported by flexibility being demonstrated in the determination of planning applications. All submissions identify the need for additional sites to be identified to deliver the Core Strategy requirements.

Additional Housing Allocations

- 1.13 The Council have identified five additional sites as Main Modifications, which it claims can deliver 190 dwellings in the next five years.
- 1.14 There was some discussion at the EiP around the sites identified by RVBC, which were identified not only to provide flexibility in the supply of housing land, but also to ensure a robust and credible five year housing land supply. These are considered in detail in the table below:

Table 1: Additional Site Comments

Site	Comments Noted from the EIP	Expected Delivery in next five years
MM1	<ul style="list-style-type: none"> • Section undeliverable as located within a flood zone • Hansons benefit from a right of way across the site 	20 dwellings only if the right of way resolvable
MM2	<ul style="list-style-type: none"> • Potential ransom strip on the site entrance, owned by Persimmon • No legal agreement in place to resolve access issue • Only Persimmon can confirm delivery timescales for the site 	40 dwellings , assuming ransom strip can be resolved
MM3	<ul style="list-style-type: none"> • Access likely to be required through Council owned land, to which there is no resolution from the Council to dispose of 	80 dwellings , assuming access can be resolved
MM4	<ul style="list-style-type: none"> • No developer signed up • No affordable housing to be provided to address identified shortfall 	10 dwellings , assuming developer interest
MM5	<ul style="list-style-type: none"> • No certainty over delivery, so likely to come forward in 5-10 year period 	No dwellings

1.15 As can be seen, the Council are proposing a suite of sites for 'flexibility' but as we discovered at the EIP there are significant issues with many sites proposed. As such the Council appear to be seeking to bring forward sites which could fail to deliver any of the units required to deliver 'flexibility' in the supply of housing land. At best, assuming that all issues can be resolved on all sites, these could only deliver 150 dwellings in the next five years.

1.16 It should also be noted that identified site HAL1 will not come forward. This is confirmed in Post 2.25 (pg 6, para1) and was further confirmed at the E, as the landowner is unwilling to bring the site forward. Therefore an additional 18 units are not deliverable from the Council's identified sites.

Sustainability Criteria

1.17 Ribble Valley Borough Council has identified 16 additional housing site options for consideration. This is identified to help to increase the amount of buffer over and above the current supply of residential dwellings being brought forward through HED DPD. This covers individual site specific appraisals for the sites, a cumulative impact assessment for the settlements as a whole and also a high level HRA.

- 1.18 It is interesting to note that the cumulative assessments on the settlement of Simonstone and Read, Mellor, Longridge, Chatburn and Clitheroe and Langho and Wilpshire all raise issues with respect to:
- local transport routes
 - the number of private cars on local roads
 - local landscape/ townscape character of the settlement through substantial mobilisation of greenfield sites
 - local emissions to air will increase due to the increasing use of private cars moving in/out of employment and/or residential areas.
 - local educational and health care facilities
- 1.19 However in relation to Site 25 in Gisburn the only site specific issues raised relate to the site's proximity to a Conservation Area and it is adjacent to a stream, both of which can be addressed through good design and site layout. It should also be noted that in relation to cumulative effects, the assessment confirms that:

*In conjunction with other predetermined committed sites it is **unlikely that any significant cumulative effects will occur** in Gisburn*

2 CONCLUSION

- 2.1 The key Core Strategy requirements of making housing more affordable and supporting the sustainability of settlements, along with boosting the supply of housing as required by the NPPF (2012), will not be delivered based on the current strategy.
- 2.2 The Hearing Sessions identified that there is a significant shortfall in the number of dwellings which will be delivered over the next five years. This will require 651 additional dwellings over the next five years.
- 2.3 Although this current consultation is predicated on additional sites which will address the shortfall in the five year housing land supply and to provide 'flexibility', the sites identified only total 190 dwellings. Furthermore, numerous concerns and constraints were raised at the Hearings, such that some sites will not deliver the number of dwellings identified in the next five years. Accordingly the identified site could only deliver, at best, 150 dwellings in the next five years.
- 2.4 Policy H1 of the Core Strategy seeks to make land available for 5,600 units over the plan period and "*These figures will be treated as a minimum target unless otherwise determined*" (our emphasis). It is therefore difficult to understand why the Council are not making further allocations to address housing needs, as there will be no harm caused to the overall plan strategy with this approach.

- 2.5 Currently the Council are at risk of identifying too few allocations to address the housing needs and as such will not deliver a positively prepared and deliverable Local Plan. In addition, the 'flexible' approach seemingly advocated by Post 2.33 is not supported by evidence nor will it comply with the 'plan led' approach of para 15 of the NPPF.
- 2.6 For the reasons set out above, LHS maintain its position that additional residential allocations should be made.
- 2.7 In this respect, there are no deliverability issues with the Main Road, Gisburn site as demonstrated in the associated Vision Document. There are no sustainability issues and no cumulative issues which could impact upon Gisburn. The site is identified as accommodating only 50 units and it can contribute towards the need to maintain a robust five year housing land supply. This site will also address the specific housing needs in Gisburn, will deliver affordable houses and will assist with the issues of affordability within this sustainable settlement.