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GLADMAN
DEVELOPMENTS LIMITED

www.gladman.co.uk

Regeneration and Housing
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA

By email only to: pmods22@ribblevalley.gov.uk

Dear Sir/Madam,

Re: Proposed Main Modifications: Additional Housing Allocations

These representations provide the response of Gladman Developments Ltd (hereafter referred to as "Gladman") to the above consultation. Gladman has been involved throughout the preparation process of the Housing and Economic Development Plan Document (HEDPD) having submitted detailed representations to previous stages of consultation.

Gladman has previously highlighted concerns regarding the site allocations contained in the HEDPD and the need for further allocations to be identified to ensure the Council has flexible and responsive supply of housing land at its disposal. Whilst the principle of allocating further housing land is supported, Gladman do not consider that sufficient land has been identified to ensure that the HEDPD is able to respond positively to changes in circumstance which may occur over the plan period. The Council openly acknowledge that they at best can demonstrate a 4.6 year housing land supply tested against a 20% buffer to take account of persistent under delivery as identified in the recent appeal decision at land at Higher Road, Longridge[1]. In this instance, the Inspector found that there is a persistent record of under-delivery of housing in the borough and a 20% buffer should be applied to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

The proposed modifications seek to allocate five additional housing sites to provide an additional 210 dwellings over the plan period. Gladman are concerned that this merely improves supply marginally and does not ensure a flexible and responsive supply of housing land over the plan period and points to the need for further flexibility to be built into the Plan. The proposed allocations will at best allow the Council to potentially demonstrate a supply of housing at the point of adoption of the Plan. However,

[1] PINS Reference – APP/T2350/W/17/3186969

site delivery can often be held up due to unrealistic build out rates, lead in times, approval of reserved matters, discharge of conditions, infrastructure and land remediation etc. If one or more sites fail to come forward over the next 5 years then the Council will be unable to demonstrate a 5 year housing land supply and a flexibility factor should be included within the site allocations to ensure that the Council can positively respond to changing market conditions.

In terms of site selection, the Council has selected its proposed allocations from sites which were submitted to the Council during the Regulation 18 and 19 consultations. However, circumstances on land availability in the borough are likely to have changed and it is therefore considered that the Council should have undertaken a new SHLAA consultation to ensure that all sites which may have been available are tested to ensure the most sustainable sites are selected for development to meet identified housing needs.

Furthermore, it is important that the proposed site allocations are tested in accordance with the Council's Sustainability Appraisal. In meeting the development needs of the area, it should be clear from the results of this assessment why some site allocations have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives.

Site Submission – Land off Henthorn Road, Clitheroe

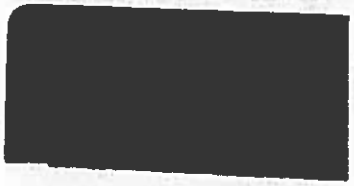
The Council will be aware of Gladman's land interests at land off Henthorn Road. In the Council's pre-application planning advice response[2], the Council confirm that the principle of the proposed residential development on the site accords with the aims of the Core Strategy by virtue of the site being directly adjacent to one of the principle settlements with good access to services and facilities. As such, Gladman consider that the proposed site offers a unique opportunity for the Council to provide housing to meet local housing needs and would provide additional flexibility within the HEDPD going forward.

Gladman are promoting Land off Henthorn Road on behalf of willing landowners who wish to develop this site. Our professional consultants have not identified any technical or infrastructure impediments with delivery of the site; therefore, the site is available and achievable to deliver the much needed housing immediately. The site, which will contribute 110 dwellings to the Council's five year supply, is on the edge of Clitheroe, a principle settlement where development is focused, as outlined in both the adopted Core Strategy and the emerging HEDPD. Land off Henthorn Road is adjacent to the south west of Clitheroe, with existing dwellings to the north east, development currently being built out to the south east on the opposite side of Henthorn Road and the new Country Park to the north; therefore, the site is a logical extension to a sustainable settlement.

Conclusions

I hope you have found this response to be constructive. Should you require any further information please do not hesitate to contact me.

Yours faithfully,



[2] See Appendix 1

APPENDIX 1

RIBBLE VALLEY BOROUGH COUNCIL

please ask for: ROBERT MAJOR
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my ref: RV/2018/ENQ/00044
your ref:
date: 18th July 2018

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Dear Ms Brow,

OUTLINE APPLICATIOPN FOR ERECTION OF 110 DWELLINGS AT LAND OFF HENTHORN ROAD, CLITHEROE

Pre-application planning advice is sought in respect of an outline planning permission for the erection of 110 dwellings on land to the north west of Henthorn Road in Clitheroe.

1. **Principle of Development**

Core Strategy Key Statement DS1 states that as a part of the overall apportionment of future housing development in the Borough, Clitheroe is regarded as a principal settlement. Both Key Statement DS1 and DMG2 of the Core Strategy, when taken together, permit development proposals in the principal settlements, including Clitheroe, which accord with the development strategy and consolidate, expand or round-off development so that it is closely related to the main built up area.

The application site is located directly to the south-west of a committed housing site which is now complete and just outside of, but adjoining, the settlement boundary of Clitheroe as outlined on the proposal map for the Borough, which will be taken to the Examination In Public (EIP) of the Housing and Economic Development Development Plan Document.

The housing requirement set out in Key Statement H1 of the Core Strategy indicates that land for residential development will be made available to deliver 5,600 dwellings, estimated at an average annual completion target of at least 280 dwellings per year over the plan period. The supporting text to Key Statement DS1 at paragraph 4.11 and Appendix 2 of the Core Strategy include tables which identify the number of houses required for each settlement by 2028 to meet the housing requirement.

The LPA are mindful that a significant number of housing developments have been permitted within or adjacent to the settlement of Clitheroe within the last few years which have all contributed to the housing supply within this locality. Policy DS1 of the Core Strategy stresses that *'in general the scale of planned housing growth will be managed to reflect existing population size, the availability of, or the opportunity to provide facilities to serve the development and the extent to which development can be accommodated within the local area'.*

The strategic harm is therefore measured against these factors. The resultant scale of growth generated from this level of development is considered to be modest overall, but does form part of the overall cumulative effect. Furthermore, the Core Strategy requirement is expressed as a minimum and not a target. Nevertheless, the LPA would like to make it clear that in confirming that the Core Strategy requirement is a minimum and not a target, this does not imply that unrestricted development will be approved within the Borough. Each proposed development has to be determined on a case by case basis.

Whilst it is accepted that this development will add to existing housing commitments and population growth within Clitheroe the site is deemed to be in a sustainable location in policy terms, being directly adjacent to the settlement boundary. As to whether an increase in housing numbers would have an impact upon existing services and facilities will be outlined within any consultee response from LCC Highways, UU etc... and it is these comments that will inform as to whether the development would result in any harm.

In summary, whilst located outside of the settlement boundary of Clitheroe, it is considered that the development accords with the aims of the Core Strategy by virtue of the site being directly adjacent one of the principal settlements which has good access to services and facilities, subject to consultation with all statutory bodies.

2. **Affordable Housing and Mix**

The pre-app as submitted proposes 110 dwellings, of which 30% would need to be affordable (33 units). In our recent meeting the Council's Housing Officer commented that the LPA would seek the following affordable housing mix: 50% shared-ownership and 50% rental accommodation. Council policies also require 15% of the units to be for over-55s through the provision of bungalows. Ideally half of the over 55s accommodation should be open market dwellings and the other half part of the affordable housing mix. Whilst the Housing Officer did suggest that there was potential for more than 50% of the over 55s accommodation to form part of the affordable housing mix, it is my view that the proposal should include some open market bungalows.

In addition to the above the LPA also requested that the applicant consider allocating part of the site for self-build dwellings, as this is a topical issue for Elected Members can could be viewed as a positive in the balanced determination of any proposal.

3. **Contributions**

As discussed at the meeting LCC will be seeking a financial contribution in respect of education for the proposed dwellings. LCC have confirmed that at the present time, and based on the assumption that all dwellings will be 4-bedroom, the estimation is that such an application would require a financial contribution totalling approximately £1,065,172, however this is subject to change depending on the eventual housing mix.

In addition to the above LCC Highways may also seek a financial contribution in relation to highway improvements, however LCC Highways have not commented on this pre-app enquiry (highway issues are discussed later in this report).

The LPA also seeks to ensure that all new residential developments provide acceptable levels of public open space within a development site, and that a financial contribution is secured for leisure facilities within the borough (due to the added demand from residents of the proposed development). As discussed in our meeting the LPA's starting point would be for this

development to include its own on site area of recreational open space, however should a justifiable case be put forward there is potential for a financial contribution to be made towards the improvement of existing nearby facilities.

In addition to on-site public open space the LPA would also seek a financial contribution with regard to leisure facilities within the borough and the increased demand these new dwellings would create. The contribution is calculated using the below formula and an example table is provided for you to calculate the required contribution – please be aware that the below table is an **estimate only**.

"Occupancy ratio x per person cost (£216.90) x number of units = contribution"

Units	Occupancy Ratios (peo	No. of dwelling	No. of people	Contribution (£
1 bed	1.3	0	0	£0.00
2 bed	1.8	30	54	£11,712.60
3 bed	2.5	40	100	£21,690.00
4 bed	3.1	40	124	£26,895.60
5 bed+	3.5	0	0	£0.00
	Total	110	278.0	£60,298.20
Total Estimated Cost per Person (£)		£216.90		

4. **Visual impact, layout, impact upon, residential amenity and design**

The submitted pre-app does not include any details in respect of a proposed layout or house design, however a very basic plan has been submitted showing the proposed development site with attenuation ponds at the front and a landscape buffer around the edge. When finalising the design/layout please consider that the LPA would expect a separation distance of 21m to be achieved between all principal elevations and 13m between principal and secondary elevations.

In terms of the landscape character of the wider area, whilst on the edge of the settlement the application site is still within the open countryside and being a greenfield site the visual impact of the development on the landscape must be carefully considered. The site would be adjoined by a residential development to the north east and on the opposite side of Henthorn Road the site has permission for residential development, and in the meeting it was confirmed that the proposal would seek to match the density of these neighbouring developments. As such the development of the proposed site could be considered to be a rounding off of the built form in this area.

In respect of the house design, it was mentioned at the meeting that the proposed dwellings would likely be similar in design, scale and appearance to the adjacent development sites which is considered to be acceptable.

5. **Highways, Access and Parking**

As detailed at the meeting LCC Highways no longer provide pre-application advice and if you require any information with regards to highways issues you should contact LCC direct to take advantage of their pre-application service. Nevertheless I am aware that for the most recent application for residential development to be accessed off Henthorn Road the Highway Officer

did comment that *"...any further development that will be served via Henthorn Road it is considered that capacity may be an issue"*. I therefore strongly advise that you contact and discuss this proposal with LCC Highways before submitting any application.

In respect of parking, the Council would require two car parking spaces per dwelling, and three car parking spaces for any dwellings with four or more bedrooms. I note that the indicative plan provided shows a footpath around the site with pedestrian links to the community parkland to the north and neighbouring development to the north west, and I am supportive of this footpath/connection to neighbouring sites.

6. **Trees and Ecology**

As mentioned above detailed plans have not been provided but the indicative plan appears to show the retention of all trees and hedging both within and on the edge of the site, as well as a landscape buffer around the site to ensure root protection areas ae respected. Any formal application would need to be accompanied by a detailed Arboricultural Impact Assessment and the LPA would be keen for all existing trees/hedgerows to be retained.

The application is a greenfield site and to the north is the River Ribble which is designated as a Biological Heritage Site. The LPA would expect any application to be accompanied by an ecology/habitat survey, including details of measures that will be put in place to ensure contaminates and pollution from the site does not enter the nearby watercourse (BHS).

7. **Other issues**

As mentioned at our meeting there are existing powerlines/cables running through the site and you are advised to contact Electricity North West in relation to diverting these infrastructure assets.

8. **Conclusion**

For the reasons detailed above it is considered that the principle of the proposed residential development of this site accords with the aims of the Core Strategy by virtue of the site being directly adjacent one of the principal settlements which has good access to services and facilities, subject to any responses from statutory consultees in relation to infrastructure.

Please however be aware that the above observations have been provided on the basis on the level of information submitted and the comments contained within this response represent officer opinion only, at the time of writing, without prejudice to the final determination of any application received. As this is major development the application would fundamentally be determined by Members at Planning and Development Committee.

Should you decide to proceed with the submission of a formal outline application it is my opinion that the following information should accompany such an application:

- Existing Site Plan and Topographical Survey
- Proposed plans and access details
- Design and Access Statement
- Planning Statement
- Arboricultural Impact Assessment (including all hedgerows)
- Ecology Report
- Site-specific flood risk assessment

- Transport Assessment
- Drainage Strategy
- Crime Impact Assessment
- Contaminated Land Report
- Section 106 Agreement

Please note this aforementioned required information may not be exhaustive and is provided on the basis of the level of information submitted. Failure to provide required information may result in an application being made invalid or potentially refused on the basis of insufficient information.

Yours Sincerely

ROBERT MAJOR
PRINCIPAL PLANNING OFFICER