

LATE RESPONSE
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MM1

7-September 2018

Our Ref: VHLP/778/2532&2576/GH

By Email Only

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Dear Sirs

Re: Our Clients – VH Land Partnerships. Representations to Housing and Economic Development – Development Plan Document. Consultation on Proposed Main Modifications – Additional Housing Sites

I am writing on behalf of VH Land Partnership Ltd to the above consultation

We support the proposed allocation of site MM3 (formerly Site 13). This is a sustainable site and a sensible allocation that will make an important contribution to meeting the Borough's housing need and the supply of land for housing.

We would however question the proposed allocation of other sites in preference to the site that we have already put forward at Wiswell Lane, Whalley. We can see no reason why other sites, notably the 'Tier 1' and 'Tranche 2' sites have been included in preference to the Wiswell Lane site, as that site meets the Proposed Additional HED DPD Allocation Site Selection Criteria contained in Appendix 1 (para 4) to the Report to the Council's Planning Committee on 17th July 2018d within Housing and Employment Land Development Plan Document. We note that the selection criteria discounts sites in the Principal Settlements with a potential capacity greater than 100 dwellings but see no logical reason behind this. The site at Wiswell Lane has a capacity of approximately 150 dwellings and could meet the selection target of delivering housing within 5 years.

On a more general note, the proposed modifications do not make adequate allocations to allow flexibility and to address shortfalls that may arise from failure to deliver in full on other allocated or ongoing development sites, especially the Standen site. It is already clear that the Standen site will not deliver the required number of dwellings in the plan period. We note the inclusion of reference to 'Tranche 2 sites' but the Council's approach simply does not give it sufficient room to manoeuvre, especially



given its previous difficulties in securing delivery of housing. In short, the Council should build in greater potential capacity and we suggest that, as a minimum, that capacity could be secured by allocating the site at Wiswell Lane, Whalley.

Yours sincerely

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