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Ribble Valley Borough Council Planning Policy Council Offices Church Walk Clitheroe Lancashire BB7 2RA

8 December 2017

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Dear Sir / Madam

LAND OFF SALESBURY VIEW, WILPSHIRE, BLACKBURN

Please find attached our response to your questions relating to Issue 2 of the Matters and Questions for the Housing and Economic Development Plan Document.

Our client, Miller Homes, have an interest in the land proposed to be allocated for residential development at Salesbury View, Wilpshire. Our Matter Statement and Development Workbook support the allocation of the site and demonstrate its deliverability within the first part of the plan period.

We trust that the enclosed will be duly considered and we look forward to a positive discussion about the site at the Hearing. If you require anything further please do not hesitate to contact me.

Kind regards

Yours sincerely

Hannah Baker



Examination Hearing Statement Issue 2

On behalf of Miller Homes



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Examination Hearing Statement Issue 2

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Examination Hearing Statement Issue 2

On behalf of Miller Homes

1. Introduction

- 1.1. This Hearing Statement has been prepared on behalf of Miller Homes in response to the Inspector's main issues and questions.
- 1.2. On behalf of Miller Homes, Indigo submitted representations to the Publication Draft of the Housing and Economic Development Plan Document (HED DPD) in June 2017, supporting the draft allocation at Salesbury View Road, Wilpshire HAL2. Miller Homes has an ongoing interest in the land and is therefore supportive of the allocation of the site for residential development.
- 1.3. This Statement sets out Miller Homes' response to Issue 2 with specific reference to the Inspector's questions which are considered relevant to the Wilpshire allocation (HAL2).
- 1.4. The Statement is accompanied by a Development Workbook which has been produced by landscape architects Open. This document demonstrates how development at the site will work well with the existing built form and can successfully take advantage of the contour of the land. It also demonstrates that the site is deliverable for a sustainable residential development of circa 134 family homes.

2. Response to Inspectors Questions

Issue 2: Housing – whether the Council's strategy for meeting its housing requirement is sound and whether the housing policies of the DPD are consistent with, and positively promote, the visions, objectives and spatial policies contained in Core Strategy?

- a) Is the amount of land allocated for housing sufficient to meeting the CS requirements?
- 2.1. The adopted Core Strategy (December 2014) makes provision for the delivery of 5,600 dwellings in the period 2008 to 2028 with a target of 'at least' 280 dwellings per annum. This will be subject to formal review within five years from adoption of the plan. The supporting Core Strategy text confirms that this figure should be treated as a minimum.
- 2.2. It is not the purpose of the HED DPD to recalculate the housing requirements outlined in the adopted Core Strategy. The Council published their latest Housing Land Availability Survey in October 2017. The survey found that the Council currently has a 5.9 year housing land supply. However; since the adoption of the Core Strategy in 2014 the Council has not hit their yearly target of 280 completions per annum and a 5% buffer has therefore been applied to the five year requirement. The annualised requirement has therefore increased to 430 dwellings (as stated on page 10 of the report). Therefore, the Council should be proactive in seeking additional housing land where possible in order to boost numbers.
- 2.3. We are mindful that this five year supply figure has not yet been tested through the planning process.
- 2.4. The HED DPD should therefore be seeking to meet as a **minimum** the housing requirements outlined within the Core Strategy. This would allow the HED DPD additional flexibility to deliver additional housing land, if needed, in the borough.
- 2.5. Wilpshire is identified as one of nine Tier 1 villages in the Core Strategy. The Tier 1 villages are deemed to be the most sustainable outside of the Borough's principle settlements. The Core Strategy allocates 66 dwellings to Wilpshire over the plan period. Once adopted the Core Strategy reduced this residual requirement to 45 dwellings and the DPD reduces it further to 34 factoring in completions and extant permissions.
- 2.6. The proposed allocation HAL2 is the only allocation within Wilpshire and it is therefore assumed that it is required to deliver the outstanding requirement for housing in Wilpshire. As demonstrated by the documentation appended to this statement, the allocation can clearly provide more than the residual requirement and these additional units should be embraced by the Council.
 - C) Will the distribution, capacity and speed of deliverability (with regard to viability and infrastructure) of the sites, including those allocated in the DPD and the Standen strategic site, satisfy the provision of a 5 year housing land supply?
- 2.7. As aforementioned, as of October 2017 the Council claims a 5.9 year housing land supply. The draft housing allocations within the DPD were not included in this calculation and as such they will directly contribute towards increasing the housing land supply.
- 2.8. As demonstrated in the Development Workbook which has been submitted alongside this Statement, this site has a potential capacity for approximately 134 dwellings. This number will help boost the borough's housing land supply in the absence of any other significant housing allocations. We note that there are no other competing sites within Wilpshire and

- Miller Homes is confident that the this site can be delivered successfully early on in the plan period (0-5 years).
- 2.9. The site attributes section of the DPD relating to HAL2 states that the site is capable of meeting the outstanding housing requirements for the settlement of Wilpshire. The Preliminary Development Capacity plan demonstrates that the site can accommodate actually significantly more development that the suggested 34 dwelling residual requirement for the settlement.
- 2.10. This illustrative layout accounts for the existing pylons and includes two areas of public open space. Whilst further structural and design work will need to be undertaken at the application stage, the plans do include some retaining walls in order to actively manage the topography of the site. Split level units are also proposed in some areas of the site to take advantage of the potential views across the Ribble Valley.
- 2.11. Miller Homes considers that the site can be viably brought forward for development and can be delivered in the short term to help meet the Council's required five year housing land supply.
 - d) Does the plan make provision for addressing inclusive design and accessible environments issues in accordance with paragraphs 57, 58, 61 and 69 of the NPPPF?
- 2.12. This section of the NPPF relates to good design as a key aspect of sustainable development. The HED DPD does not have specific design and accessibility policies for each allocation. This allows flexibility for developers to bring sites forward to their own specification in accordance with the design policies contained within the Core Strategy and the NPPF.
- 2.13. The Workbook which forms part of this submission shows how important high quality design will be for HAL2. The settlement slopes sharply up from Whalley New Road and rises up to the east to the ridge which forms part of the sites boundary. The layout of the site must therefore incorporate the topography and this will take careful design. The Workbook looks in detail at house types in the surrounding area in order to understand how they have dealt with the steep gradient.
- 2.14. Development at the site could potentially sit on a series of platforms which 'step down' towards Knotts Brook. These platforms will take advantage, where possible, of views across the Ribble Valley. In some cases, split level house types may be used in order to facilitate development.
- 2.15. There is no requirement in the DPD for pedestrian access through the site or through to the brook to the south. However, as the Conceptual Illustrative Framework demonstrates, this must be an important consideration and benefit when bringing HAL2 forward for development.
- 2.16. The site contains a Public Right of Way (PROW) which runs north/south linking Hollowhead Avenue to Knotts Brook. The proposed public open space links into this public footpath and provides connectivity east/west linking Salesbury View Road to the existing public right of way.
- 2.17. Given the sites steep topography the illustrative framework proposes roads which run along the contours of the site to ensure that the gradient is carefully managed to make the site easily accessible.
- 2.18. Development brought forward in accordance with the principles outlined in the Workbook will accord with the above paragraphs of the NPPF. Miller Homes seeks to deliver high quality development across all of their sites and as such will continue to work with Open and with

the Council in order to bring forward the most suitable development at the site.

- e) Are Housing Allocation Policies HAL1 and HAL2 clear on what will and will not be permitted for example housing numbers, tenue mix?
- 2.19. There is nothing contained within the DPD supporting text which specifies dwelling numbers or housing mix for HAL2. It is assumed from the wording of the plan that the allocation is to accommodate the residual amount of development for Wilpshire which currently amounts to 34 dwellings.
- 2.20. It is clear, however, from the work undertaken by Open that the site comfortably has capacity for around 134 dwellings. In choosing to allocate such a large site within the settlement the council should be clear that the residual number of dwellings is a **minimum** and that delivery above this amount on the site would be deemed acceptable.
- 2.21. It would not be appropriate to simply develop a small portion of this wider site for 34 units and leave the rest of the site undeveloped. As demonstrated in the Workbook, development at the site fits well with the existing form of the settlement. It does not extend the line of the built form beyond that of Hollowhead Avenue and the topography of the land provides a natural boundary to the fields beyond. The site is therefore able to accommodate a larger quantum of development without detriment to the organic evolution of the settlement.
- 2.22. Similarly there is no reference to tenue mix within HAL2 and therefore we assume that this will be in accordance with policies contained within the Core Strategy and the NPPF. The Workbook does not yet examine details such a tenure mix and house types as the development of site design is in its early stages. However, Miller Homes will seek to work with the Council during the planning application process to ensure that the tenure and house type mix is correct for the site.
 - f) Is the proposed monitoring likely to be adequate and what steps will be taken if the site doesn't come forward
- 2.23. The monitoring approach is not adequate. Whilst the Council has been monitoring housing provision each year through its Housing Land Availability Survey, the results from this survey have not been included in this plan. The target for dwellings per annum has increased from the 280 stated in the plan to 430 due to the borough failing to meet its targets. However this increased number is not reflected in the provision of sites in the HED DPD.
- 2.24. As there is no proposed delivery trajectory for HAL2 it is unclear how the council will measure if the site is not delivering. The DPD should be clear on when the Council expect the allocations to deliver in order for developers to meet these targets.
- 2.25. There is no indication of the steps which will be taken should an allocated site not come forward for development. However, regardless, it is evident from the Workbook produced, this Statement and our earlier submissions that Miller Homes is seeking to and can viably develop the site in the short term for residential development.
 - g) How will the housing allocation in the DPD deliver the affordable housing set out in CS Policy H3?
- 2.26. For clarity, we assume that this refers to the 'Key Statement H3: Affordable Housing'.
- 2.27. The housing allocations in the DPD will be expected to deliver 30% affordable housing which may be reduced to 20% where supporting evidence is provided to justify the lower level of provision. There are no policies contained within the HED DPD relating to affordable housing and it should therefore be expected that the allocations within the DPD will deliver affordable housing in accordance with the policies contained within the Core Strategy.

- 2.28. Miller Homes is still in the early stages of planning the site layout and design for HAL2. It will enter into discussion with the Council regarding details such as affordable housing once the site moves towards an application submission.
- 2.29. The allocations in the DPD will therefore contribute towards the delivery of affordable housing as set out in Key Statement H3: Affordable Housing.

3. Conclusion

- 3.1. We support the Council's allocation of HAL2 for further housing development in Wilpshire in order to meet the residual housing requirement outlined in the Core Strategy and contribute to the Council's required five year housing land supply. As demonstrated in this Statement and the supporting Workbook, the site is deliverable in the short term and can significantly contribute towards the borough's housing land supply.
- 3.2. Further clarity is required on the quantum of development which is acceptable at the site. It is clear that the site can comfortably accommodate significantly more that the residual number of dwellings required for Wilpshire and it should therefore be made clear within the DPD that the current target figure of 34 dwellings is a **minimum** requirement for delivery on the site. Furthermore, the draft policy should acknowledge the far greater potential capacity of the site for delivery of new family homes and given this is the only proposed allocation in Wilpshire, encourage a more appropriate level of development that is more sustainable and able to fulfil the wider objectives of the Council's Core Strategy and the NPPF.
- 3.3. Miller Homes is a national housebuilder with a long history of delivering quality housing across the UK. It is committed to working with the Council to deliver a high quality residential development in Wilpshire which will be aided by the confirmation of the allocation of HAL2 for residential use.

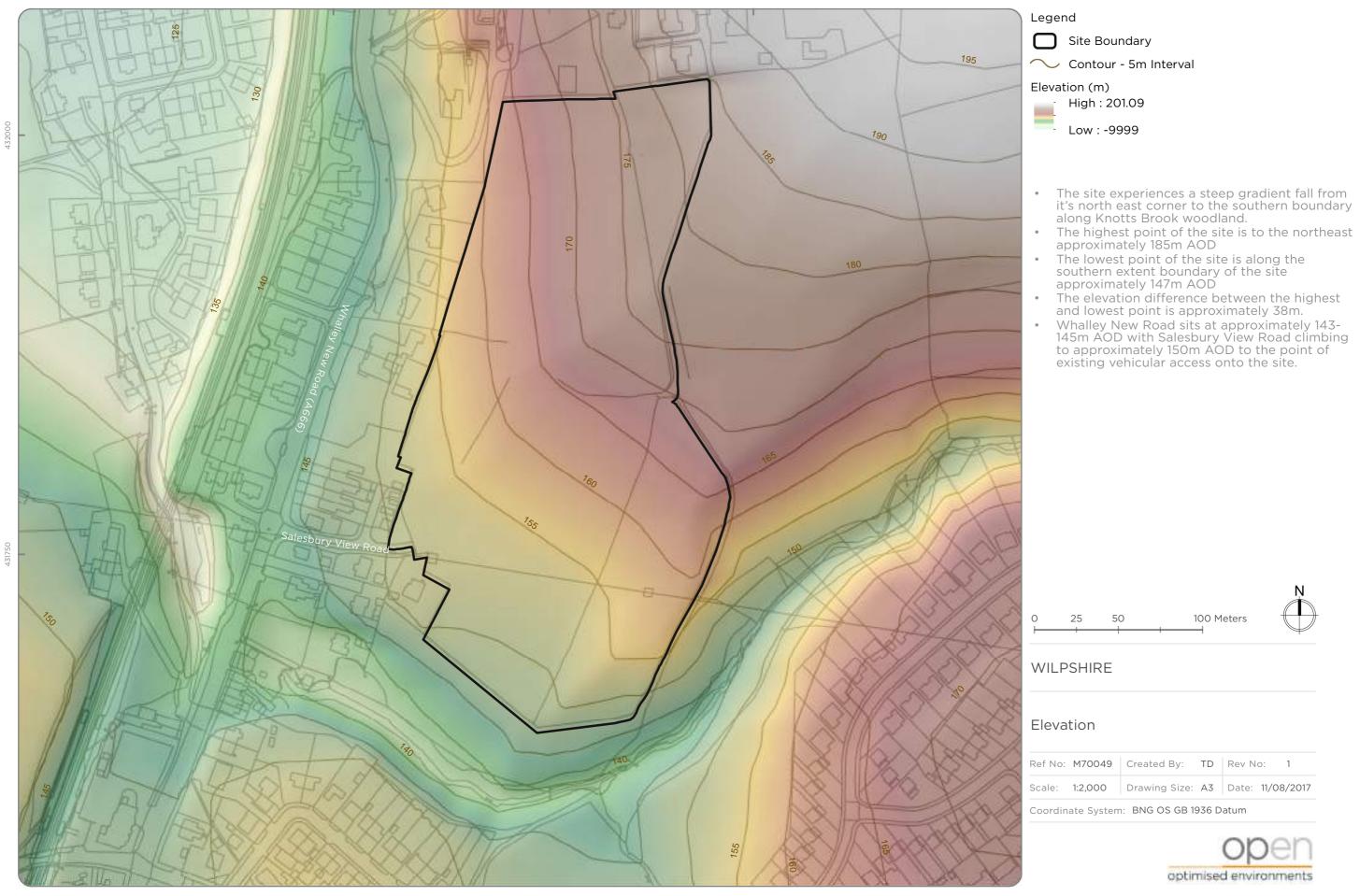


Project: Land off Salesbury Road, Wilpshire Document: M70049_WilpS_01

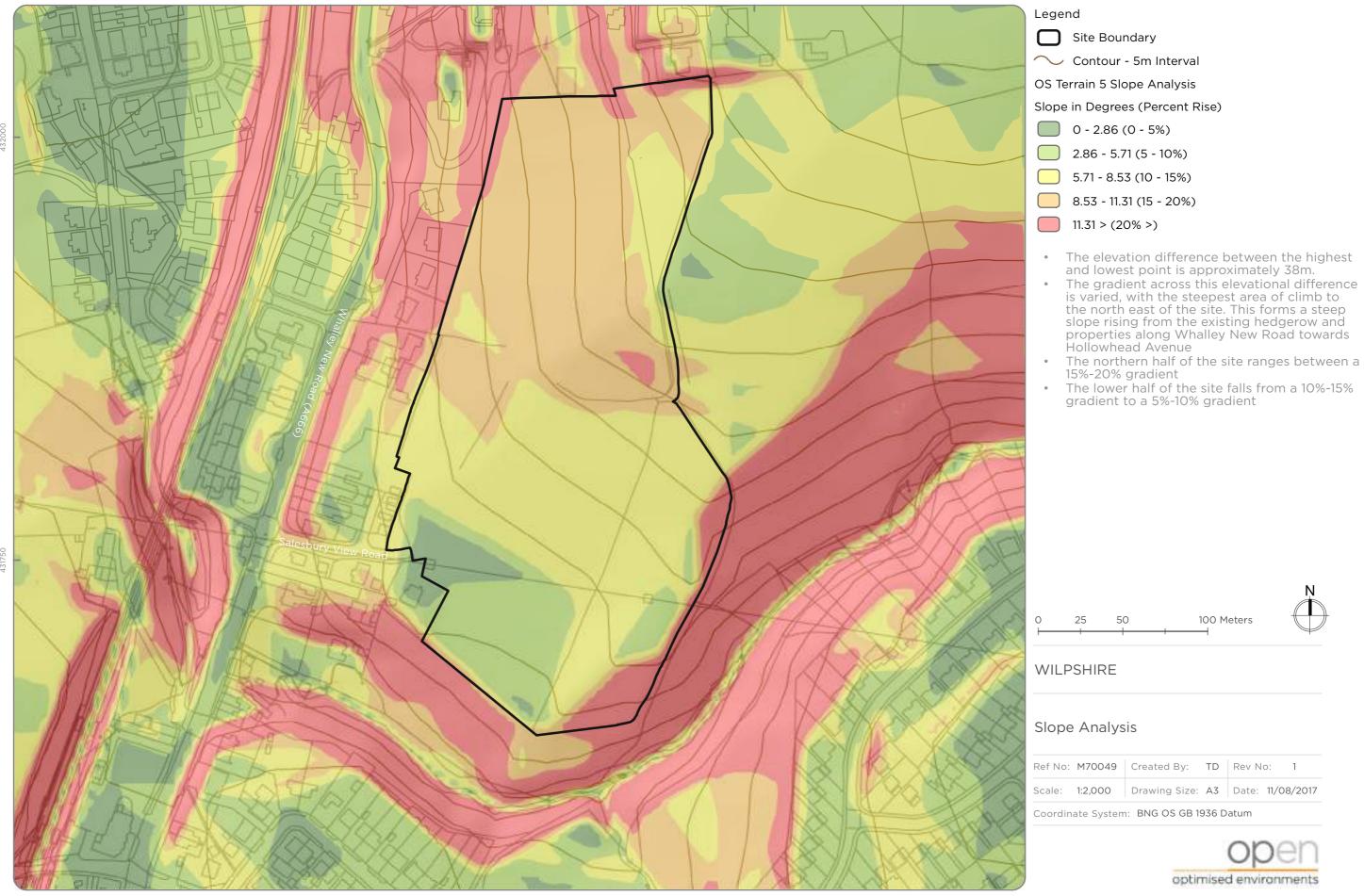
Issue	Revision	Ву	Approved	Date
2	Updated drawings, client comments and additional text and plan material	MF	JF	06/12/17
3	Updated drawings, client comments and additional text and plan material	MF	JF	07/12/17
4	Amends to text and minor updates to plan	MF	JF	07/12/17



Elevation

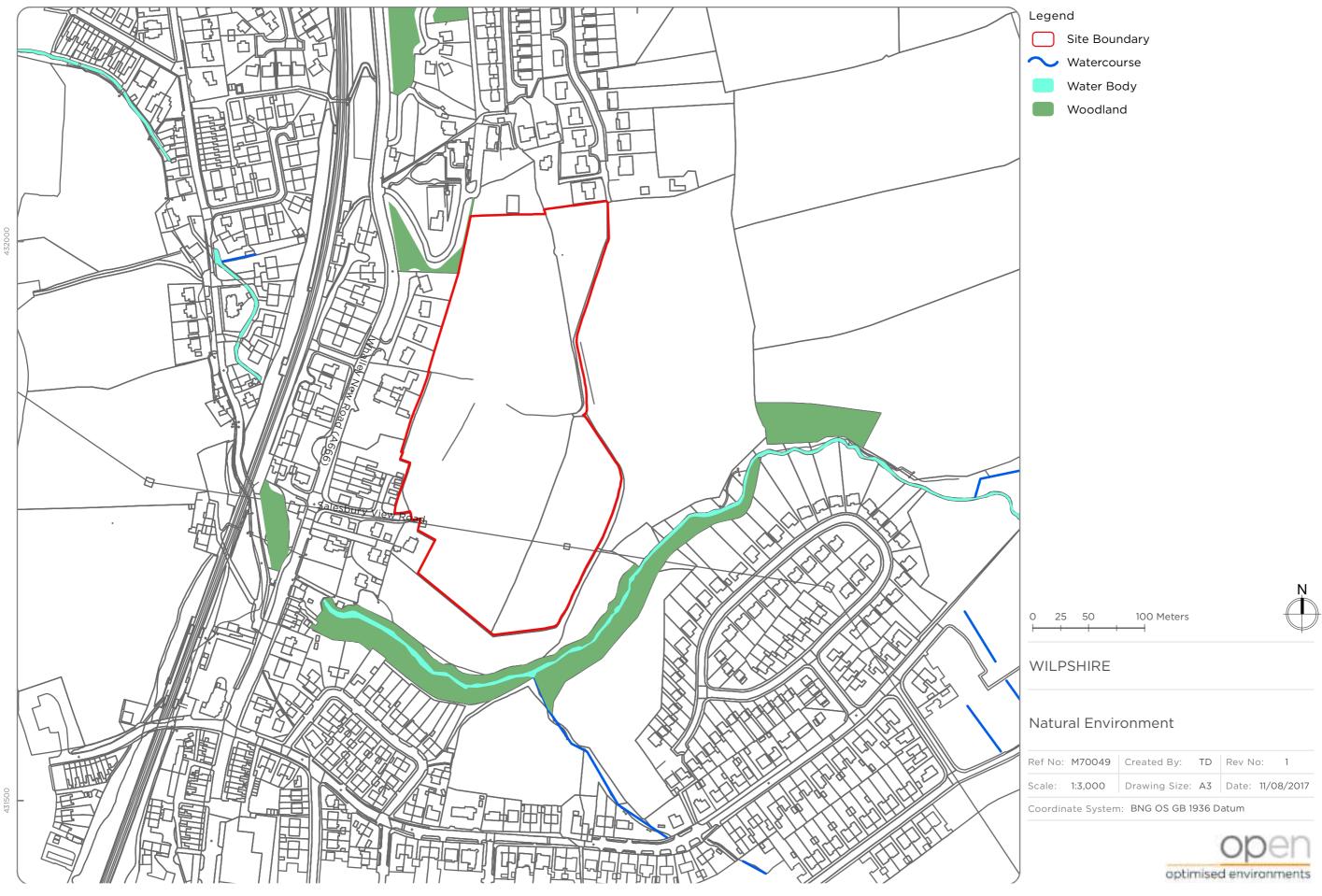


Slopes



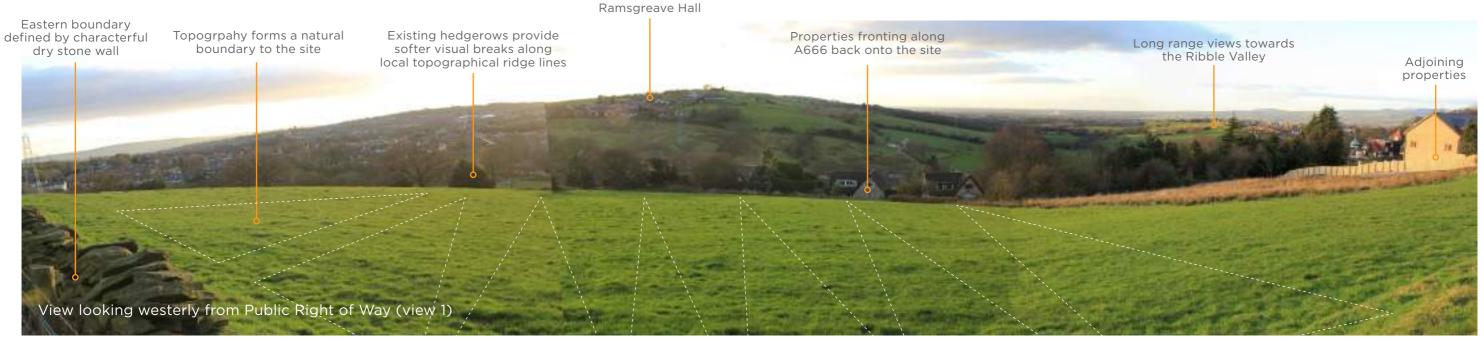


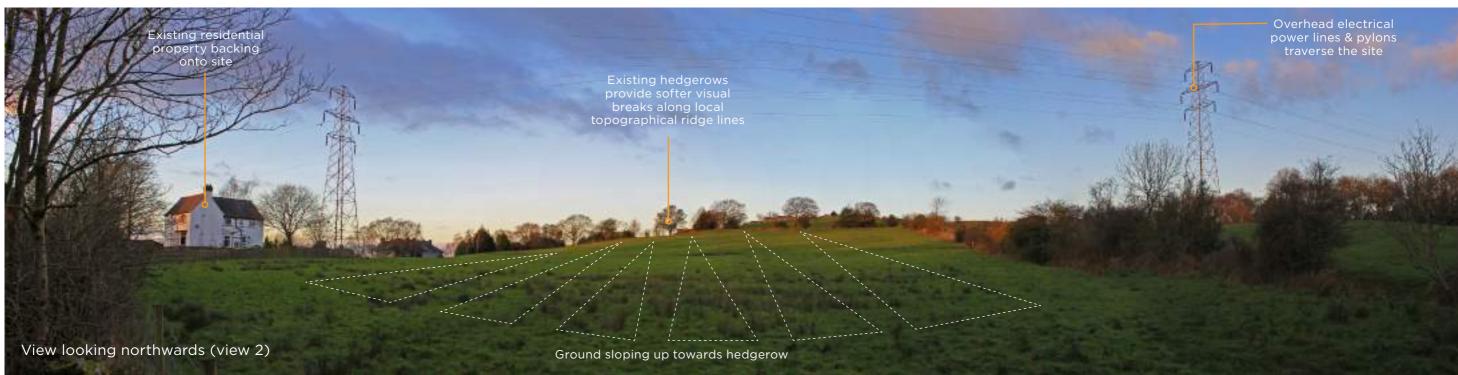
Natural features

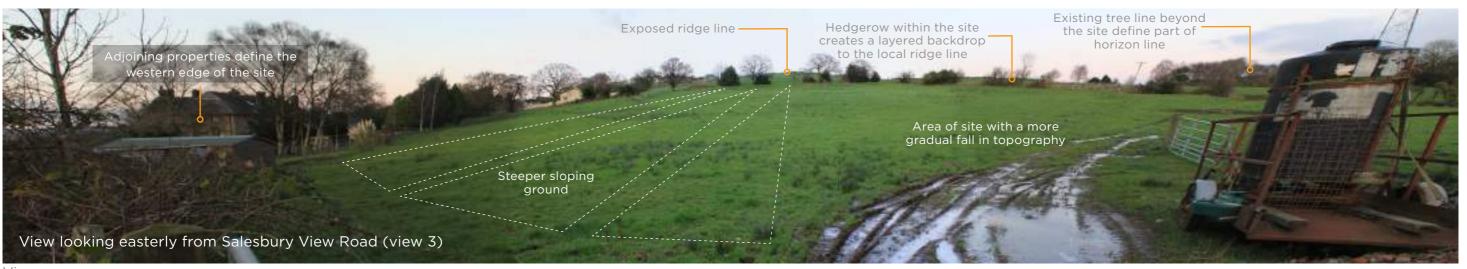


Site views





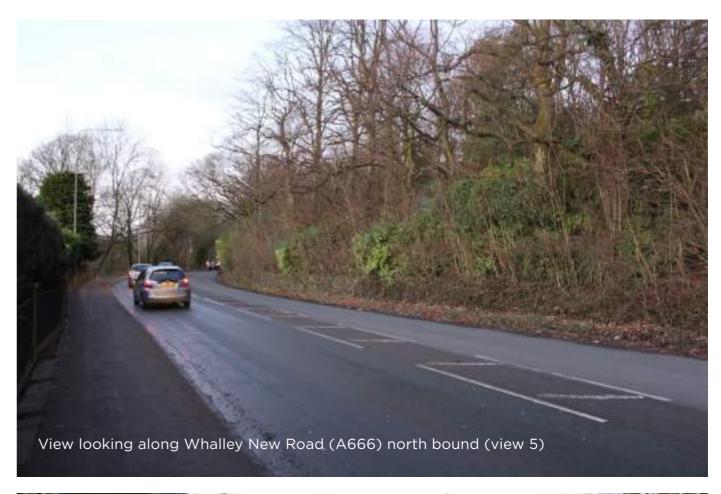




Views

Vehicular access & movement









Land off Salesbury View Road, Wilpshire: Workbook

Pedestrian access & movement









Surrounding built form and topography



> Built character















Built form responses to topography









Natural character









Technical and place-making considerations



Land off Salesbury View Road, Wilpshire: Workbook

pg. 16

Design Concept

Sustainable urban growth which integrates with the surrounding landscape profile:

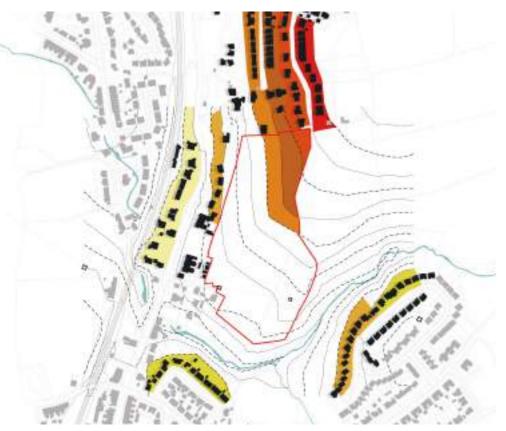
- The Wilpshire settlement sustainably extends eastwards, reflecting growth patterns to the areas immediately north and south of the site. The site forms a logical and discrete proposal for further settlement growth to Wilpshire
- The local topography that characterises the area to the east of Whalley New Road will inform the development response across the site. The site allows development to nestle against the existing settlement edge whilst preserving the dominant hill top ridge line.

Development would form a natural extension to Wilpshire which is spatially consistent to that of the existing building form.





Development approaches to topography



Existing development structures in response to topography

Dwellings follow topographical contours, creating ribbons of linear development. Development at Salesbury View Road will need to respond to the contour profile of the site Existing development along Hollyhead

preservation of the hilltop ridge line

housing development responds to the existing topography and views

preservation of the hedgeline and existing trees

Maximise the shallow slope with higher density housing

Existing development fronting along Whalley New Road

Working with topogrpahy and existing features

Along steeper areas of the site, dwellings can climb the hillside through a series of platforms, opening up long range views. Retaining the trees and hedgerows through the centre of the site form a visual break in the urban form. The lower parts of the site form more gradual contours, where more traditional housing forms could be accommodated.





Layering of landscape features & new development

Retaining the existing trees and hedgerows through the centre of the site, creates a layering of dwellings and landscape. The horizon line formed by hedgerows and trees is still visible, with new development siting below, amongst landscape spaces and vegetation.



> Preliminary development capacity

Capacity testing plan has been developed to gain an understanding to the development potential across the site, in relation to the site constraints, it's immediate context and the local topography.

This is an initial draft plan for the purposes of consultation with the Local Council. The applied densities of 30 dwellings per hectare (dph) are used to inform the initial capacity testing exercise and are subject to consideration in light of discussions with the relevant stakeholders

Preliminary Development Schedule

TOTAL SITE AREA: 5.40ha

GREEN SPACE: 0.96ha

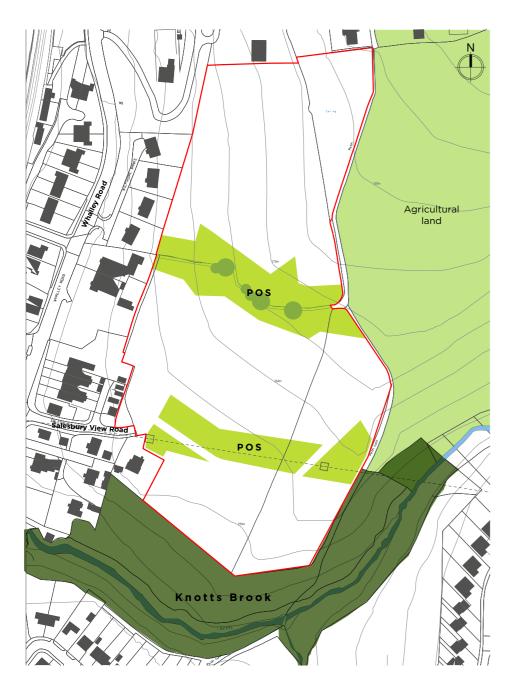
NET DEVELOPABLE AREA: 4.44ha

@ 30dph: 134



Initial development framework

Masterplan structure components



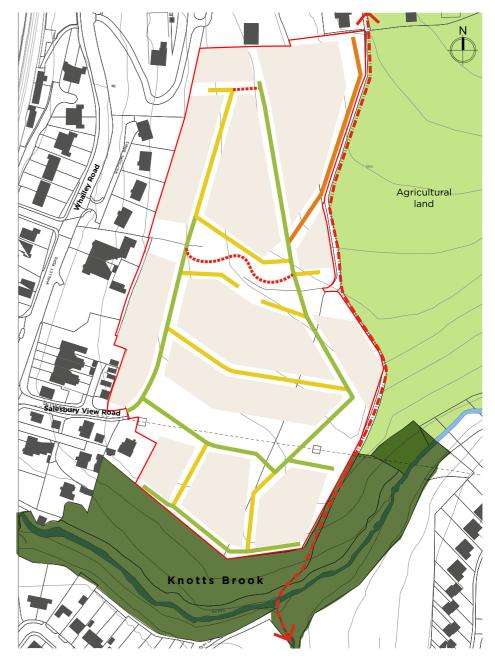
Public open space structure & tree retention

- East to west areas of linear public open space which connect to the adjacent countryside and PRoW
- Most northern linear space focused around the retained hedgerows and tree groups, which help to form a visual break in the built form of the development
- Second linear space located under and along the overhead power lines



Development structure

- Development parcels respond to the technical challenges of the local topography whilst also creating a legible and permeable block structure
- Parcels orientated to ensure natural surveillance and maximising short and long range views where possible
- Site gradients are managed through the development parcels ensuring where possible proposed dwellings address the street
- Northern development parcels follow the existing contours; a response present further north of the site.



Accessibility of the street network

- An internal street structure and hierarchy that serves perimeter blocks
- Pedestrian and vehicular accessibility is promoted through a connected and permeable street structure
- All streets look to achieve a minimum of 1:12 gradient
- Green: Gently rising streets with an average gradient of 1:20
- Yellow: Intermediate streets between 1:20 1:12 gradients
- Amber: Street profile rises up at a gradient no steeper than 1:12
- Red: Pedestrian connections (including existing PRoW) which are steeper than 1:12 gradient.

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