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## **EXAMINATION OF THE RIBBLE VALLEY HOUSING AND** ECONOMIC DEVELOPMENT, DEVELOPMENT PLAN DOCUMENT (HED DPD) HEARING STATEMENT RESPONSE TO THE COUNCIL'S HOUSING **POSITION PAPER**

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## **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 Housing Position Paper published by Ribble Valley Borough Council on 5<sup>th</sup> December 2018. The Housing Position Paper has been prepared to inform the Examination of the Ribble Valley HED DPD. It focuses on housing and is intended to deal with a number of matters raised as a result of the Council's approach to five year land supply following the submission of the plan, and more recently the submission of a new 5 year housing land supply statement (as at 30<sup>th</sup> September 2018) published November 2018, a Housing Land Availability Survey (as at 30<sup>th</sup> September 2018) published November 2018, and the supporting Evidence of Delivery that were all submitted to the Inspector on 20<sup>th</sup> November 2018, one week before the commencement of the HED DPD examination hearings.
- 1.4. Paragraph 2.1 of the Council's Housing Position Paper, states that 'the HED DPD itself has a narrow focus given the extent of development already committed in the area and what is considered necessary to achieve the requirements of the Core Strategy. It also provides a vehicle to provide an updated proposals map in conjunction with the allocations process.' However, 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.
- 1.5. This is highlighted in Appendix 2 of the Housing Position Paper. It is well documented within the Council's Core Strategy that the Council's Development Plan needs to deliver as a minimum 5600 dwellings over the course of the plan period. However, under the aforementioned appendix, the expectation that 3289 dwellings will be delivered over the plan period, alongside the current actual completions up until 30<sup>th</sup> November 2018 of 2018, will deliver just 5651 dwellings. A mere additional 51 dwellings above the 5600 minimum housing requirements of the Core Strategy.
- 1.6. Without dissecting each site or allocation foreseen to provide the 3289 dwellings over the plan period, it is clear that allowing such small flexibility provides little room for manoeuvre should sites not come forward, or if indeed the deliverability of sites is deemed to provide a far smaller amount of dwellings than an outline planning permission was granted for. Such an example is already evidenced within the Council's Housing Position Paper. Under Table 2 of Appendix 2 details are provided as to how the 3289 dwellings are made up. As part of this calculation, land east of Chipping



Lane, Longridge, Phases 2 and 3 is considered to provide for 239 dwellings over the plan period, based on the extant outline planning permission. However, within POST 2.28, the Council's Evidence of Delivery for its 5-year supply, evidence is provided within ENV21 in the statement of common ground with the developer (Barratt Homes) dated 15<sup>th</sup> November 2018, that the development will in fact deliver just 184 dwellings, as opposed to the 239 dwellings secured through the outline planning permission. This is supplemented further by a current reserved matters application for 184 dwellings (planning application ref. 3/2018/0975). This would result in a reduction of 55 dwellings within the Council's housing trajectory, bringing the total dwellings anticipated to 3234, and the total including completions to 5596 dwellings over the plan period, below the required 5600 minimum target set out within the Core Strategy.

- 1.7. Whilst this is just one site (not all sites have been assessed in detail by PWA Planning), it does underline the deficiency in the Council's housing trajectory and lack of housing allocations within the proposed HED DPD to ensure the minimum housing targets set out within the Council's Core Strategy are achieved.
- 1.8. 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. planning application ref. 3/2018/0507). Such allocations should then be reflected within HED DPD and the settlement boundaries on the Proposals Map.