



Strategic Land Group

**Henthorn Road,
Clitheroe**

**Ribble Valley BC
5 Year Housing Land
Supply Analysis**

December 2012

Ref: 2012-156-006b

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Analysis**

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**Authorised for and on behalf NJL
Consulting LLP**



**Nick Lee
Partner**

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1.0 Policy Background

- 1.1 Following the adoption of the National Planning Policy Framework (NPPF), in order to significantly boost the supply of housing, Local Planning Authorities (LPAs) are required to *'identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements.'* In order to ensure choice and competition in the land market, an extra buffer of 5% should be allowed in addition to this target, increasing to 20% where there is a *'record of persistent under delivery'* (paragraph 47). In the event that an adequate supply of housing land cannot be demonstrated, *'relevant policies for the supply of housing should not be considered up-to-date'* (paragraph 48). This is a re-affirmation of the position for housing supply as set out in Planning Policy Guidance Note 3, which was superseded by the NPPF.
- 1.2 The approach to calculating the supply of housing land was set out in the DCLG's Strategic Housing Land Availability Assessment (SHLAA) Practice Guidance (July 2007). This is not identified in Annex 3 of the NPPF as having been replaced, and is therefore presumed to still be relevant insofar as it is consistent with the NPPF itself, and specifically paragraphs 47 to 49 which cover housing supply issues.
- 1.3 In summary, these two documents identify that, to be included in the 5 year housing land supply, sites should be:
- **Available:** *'there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This means that it is controlled by a housing developer who has expressed an intention to develop, or the land owner has expressed an intention to sell.'*
 - **Suitable:** *'would contribute to the creation of sustainable, mixed communities'* and is not constrained by policy restrictions, physical problems or limitations, potential unacceptable impacts and environmental conditions.
 - **Achievable:** *'A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time.'* This must take into account market, cost and delivery factors.
- 1.4 A key change introduced by the NPPF is that sites with planning permission should now be included in the supply unless there is clear evidence that schemes will not be implemented within 5 years. Such factors include the site not being viable, long term phasing plans, or a lack of demand for the type of units proposed.

2.0 Housing Targets in Ribble Valley BC

- 2.1 Ribble Valley Borough Council's (RVBC's) most recent assessment of their housing land supply position is set out in two documents, the '*Housing Land Availability Schedule*', dated October 2012 and the '*Report to Planning & Development Committee*', dated July 2012, but presented to the September Committee. The Housing Land Availability Schedule report identifies the housing target as a rate of 161 dwellings per annum (dpa), as set out in the Regional Spatial Strategy (RSS) for the North West. The Government has announced its intention to revoke the RSS, and LPAs are now allowed to set their own, objectively assessed housing targets.
- 2.2 RVBC are well progressed with preparing their new Core Strategy which is intended to have a new housing target equivalent to 200 dpa.
- 2.3 The Report to Planning and Development Committee provides information on the most recent results of the Housing Land Availability Survey and calculates RVBC's 5 year supply based on both the RSS requirement and the forthcoming proposed Core Strategy requirement. That Core Strategy, which is intended to cover the period until 2028, has now been submitted for Examination in Public, prior to its formal adoption.
- 2.4 The status of the emerging housing target was discussed in a recent appeal relating to a site on Henthorn Road in Clitheroe. The Inspector commented in this instance that the appropriate housing requirement figure to be used in determining the appeal would be '*not less than 200 dwellings per annum*' although the Inspector noted that robust evidence does suggest that the actual housing target could be much closer to 330 to 350 dwellings per annum.
- 2.5 Therefore the appropriate annual target for RVBC should be considered to be at least 200 dwellings per annum. This would equate to a target over 5 years of 1,000 dwellings, and it is this figure which has been used as the basis for this assessment. The annual housing figure is taken from the Council's wish to deliver 4000 homes over the plan period (2008-2028).
- 2.6 Over the last 9 years, the Ribble Valley Housing Land Availability Schedule identifies that the RSS housing target has only been achieved once (in 2003/4). This is a comparable record of deliver with Wigan MBC (who achieved their target just twice in 9 years). The Inspector considering the Wigan Core Strategy concluded that, in this case, a 20% buffer should be provided. The same buffer should therefore clearly be allowed in RVBC, and this is acknowledged by RVBC in their own assessment of housing supply. Applying this buffer would therefore give a revised housing target over the next 5 years of 1,000 (the 5 year supply) plus 200 (the 20% buffer) totalling 1,200 dwellings.

- 2.7 The Ribble Valley Housing Land Availability Schedule also identifies that in the 4.5 year period between 2008 to 2012, 439 dwellings have been completed. The target for this period would have been 900 dwellings (4.5 years x 200dpa) resulting in a shortfall of 461 dwellings accruing against the housing target.
- 2.8 The ethos of the NPPF is that housing delivery should be front-loaded – this is best exemplified by the requirement to allow a buffer against the required housing target, by bringing completions forward from later in the plan period. In another recent appeal decision (Sellars Farm, Hardwicke [2165865]) the Inspector clearly stated that, in keeping with this philosophy, any accrued shortfall should be added to the 5 year housing supply rather than being recovered over the duration of the plan period.
- 2.9 This point is further illustrated by an appeal decision on a site in Honeybourne (2172588) where the Inspector clearly states that *'it is better to meet the shortfall sooner rather than later. Moreover, if the buffers are brought forward into the first 5 years as in the NPPF, so also should the shortfall'*. Adding this shortfall to the 5 year housing target would therefore give a revised 5 year supply of 1,200 (5 year supply + 20% buffer) plus 461 (accrued shortfall) totalling 1,661 dwellings. This target is equivalent to 332 dwellings per annum. Although this methodology is different to the one employed by RVBC, it is clear from the body of evidence that it is the correct approach.
- 2.10 The report presented to Committee takes a slightly different approach to the shortfall. Rather than add the buffer simply to the housing target it is, instead, also added to the accrued shortfall. If the 20% buffer were added to the accrued shortfall using our calculations, the housing target would be 1,000 (the 5 year target) plus 461 (the accrued shortfall) plus 292 (the revised 20% buffer) totalling 1,753 dwellings. This target is equivalent to 350 dpa
- 2.11 Consequently, this revised figure of 1,753 dwellings for the 5 year housing target will be used as the basis of this assessment.

3.0 Housing Supply in Ribble Valley BC

- 3.1 A total of supply of 1,414 units are identified in the Housing Land Availability Schedule. Compared to our previously discussed assessment of the housing target, this would equate to a 4.2 year supply of housing land. If the 20% buffer is also applied to the accrued shortfall, as well as the actual target, this would equate to a 4.0 year supply.
- 3.2 Notwithstanding the lack of a 5 year supply, the identified figure of 1,414 would appear to be overstated. Further analysis has been carried out on those sites identified in the *Housing*

Land Availability Schedule dated October 2012 to determine whether or not the sites identified are, in fact, suitable, achievable and deliverable.

- 3.3 This exercise has involved examination of the planning history of each site along with consideration of other site specific issues which could impact delivery. It is not intended to be an exhaustive exercise, but it does provide a reasoned assessment of the actual number of dwellings likely to be delivered off each of those sites in the next five years. This assessment was carried out in accordance with the DCLG SHLAA Guidance (July 2007) apart from those elements of that Guidance which have subsequently been superseded by NPPF paragraphs 47 to 49 and the associated footnotes. The outcome of that site by site analysis is contained in Appendix 1 and 2.
- 3.4 The analysis of the housing supply was also informed by recent appeal decisions which considered this matter. For example, in an appeal allowed on 23 August 2012 in the High Peak Borough Council area, the Inspector confirmed that sites without planning permission should not be included in the calculated housing supply.
- 3.1 As the SHLAA is now over 3 years old, the Housing Land Availability Schedule (October 2012) has been used to assess and analyse the housing position within the Ribble Valley.

Sites under Construction

- 3.2 The Schedule identifies 185 units under construction. 139 units are '*sites on which development has started, units under construction*' and 46 units of '*Conversions to dwellings, development commenced*'. Out of the 46 sites with '*Conversions to dwellings*', 14 of these have planning permissions that are older than two years and up to 15 years old. The majority of these sites are single dwelling conversions, and as such, one can assume the construction process should take no longer than two years. In light of this, it is reasonable to assume that all such permissions that commenced over two years ago are unlikely to be completed and can now be excluded from the assessed supply.
- 3.3 37 units are listed in the small sites category of '*Sites on which development has commenced, units under construction*', 27 units are from permissions that date back to 2009 or older. As the vast majority of these sites are for single dwelling construction, it is reasonable to assume that these should also be excluded from this calculation. Therefore 41 units should be eliminated from the housing supply.
- 3.4 This leaves a revised figure of **144 units under construction** of which to be included in the supply.

Affordable Housing Units

- 3.5 Ribble Valley Borough Council identified 240 affordable housing units in their analysis. In addition to this, the Housing Schedule document then identified a number of Affordable Units in the '*Sites over 0.4 hectares*' section. For ease of comparison, NJL have separated the schemes to show Market and Affordable housing units as individual analyses; this consequently shows a higher number of affordable units than the Ribble Valley Housing Schedule.
- 3.6 After analysis of the Affordable Housing figures (which are available in Appendix 1), a number of sites have been removed from the list. This is due to the current market situation and actual prospect of the sites coming forward. For example, if the consent was a renewal of an original consent and the site has still not come forward, the prospect of the site materialising imminently is low given the dependence of affordable housing schemes on grant funding. In addition, on one of the sites, the developer has informed NJL that the site is not currently viable and will be subject to a renewed application at some point in 2013; as such this site has been excluded.
- 3.7 In summary, and making the appropriate corrections to the supply, out of the identified 268 affordable units, a revised figure of **216 affordable units** have been included in the housing supply.

Sites subject to Section 106 Agreements

- 3.8 The Committee Report identifies 232 units which, as yet, only have resolutions to grant planning permission subject to entering into a Section 106 Agreements. Notwithstanding that none of these sites yet have planning permission and should, strictly, not be included in the 5 year supply, the length of time these S106 Agreements have been outstanding gives an indication of the likely ability of the site to deliver.
- 3.9 For example, the site at the Old Manchester Offices, Whalley New Road, Billington should reasonably be removed from this list due to the amount of time the S106 has been outstanding. The site is for 18 dwellings and went to Committee in May 2010. The S106 Agreement for the Woone Lane site has also been pending for some time, and case could also be made for the removal of these 113 units from the supply.
- 3.10 For the purposes of this analysis, just the 18 dwellings from Billington will be removed. Removing these dwellings would therefore leave a revised **S106 Agreement figure of 214 units**.

Sites with Planning Permission

- 3.11 The House Land Availability Schedule identifies 893 sites with Planning Permission (Full, Outline or Reserved Matters). NJL assess the total number of dwellings to be 865 excluding

the aforementioned affordable housing units. After analysis of the units in the schedule, a number of sites can reasonably be discounted due to current market conditions precluding the delivery of affordable apartment schemes or an over estimation of potential delivery rates.

- 3.12 An analysis of the sites is appended to this document (Appendix 2). In summary the analysis demonstrated that 112 units should be excluded from the supply, leaving a revised **Market housing total of 753 units**.

Slippage Allowance

- 3.13 In RVBC's assessment of the Housing Land Supply, a slippage allowance of 10% has been applied to all those units which are not currently under construction. This is intended to reflect non-delivery of units for reasons that cannot be currently foreseen, and is an approach that has been supported at a number of appeals.
- 3.14 The slippage allowance has also been applied to our assessment of the housing supply, having already eliminated those units which should not be included in the supply in the first instance.
- 3.15 Table 1 compares our assessment with the one carried out by RVBC and the number of dwellings by which the supply has changed as a result.

Factor	LPA Assessment	NJL Assessment
Sites subject to Section 106 agreements	232	214
Affordable Units	268	216
Sites with Planning Permission	865	753
Sub-Total	1365	1183
Less 10% Slippage Allowance	1229	1065
Sites under construction	185	144
Total Supply (including slippage allowance)	1414	1209

Table 1: Summary of reasons for adjustment to housing supply.

- 3.16 In total, this assessment has identified that a total of 205 dwellings should be excluded from the five year housing supply.

4.0 Conclusion

4.1 Based on this analysis, Ribble Valley's Housing Supply is summarised in table 2.

Stated 5 Year Supply In Ribble Valley (Committee Report, September 2012)	1,414 dwellings
Adjustment For Overstatement In Report	205 dwellings
Recalculated 5 Year Supply	1,209 dwellings
Annual Housing figure inclusive of Shortfall and 20% Buffer	350 dwellings per annum
Ribble Valley Housing Supply (1209/350)	3.45 years

Table 2: Recalculated Housing Supply.

- 4.2 It is clear from the Housing Land Schedule and Committee Report that housing supply has been overstated while the housing target has been understated.
- 4.3 This report has demonstrated through recent appeals that the shortfall in supply should be addressed over a 5 year period not over the entire plan period as Ribble Valley have. This report has also demonstrated that an overstatement of approximately 205 dwellings has been made.
- 4.4 The housing land supply position actually totals 1,209 dwellings, equating to a **3.45 year supply** (or a 3.6 year supply if the 20% buffer is not applied to the shortfall as well).
- 4.5 In line with NPPF paragraph 49, '*relevant policies for the supply of housing should not be considered up-to-date*'; applications for the residential development should be approved as a matter of urgency where they represent sustainable development as defined by the NPPF.

Appendix 1 – Affordable Housing Analysis

Appendix 1 - Affordable housing analysis

SITE REF	SITE LOCATION	TOWNSHIP	LPA Estimate	NJL Est. DELIVERY	DATE OF APPROVAL	COMMENTS
3/2010/0918	Land adj 28 Kirkmoor Rd	Clitheroe	3	0	12/01/2011	Renewal of application 3/2007/0575P. Application has not been delivered since 2007, therefore presumed unviable.
3/2010/0820	Land north of Riddings Lane	Whalley	24	24	16/09/2011	Approved at Appeal; Assumed deliverable.
3/2010/0550	Former Barkers Garden centre - Whalley Road	Clitheroe	9	0	28/09/2011	Application for outline planning permission to construct 30 apartments, 2 houses and a 40 bed nursing home - current market not favourable for apartments.
3/2010/0113 3/2012/0368	Land adj Whalley Road	Sabden	8	8	12/10/2011 4/5/2011	Non-material amendment to planning permission 3/2010/0113P
3/2010/0751 3/2011/0460	Land at Whalley New Road	Whalley	11	0	25/11/2011 8/8/2011	Outline approval for affordable units - approved on the 8th November 2011 and no reserved matters have come forward. Therefore presumed not viable.
3/2010/1014	11 Stubbins Lane	Sabden	1	1	28/11/2011	Removal of redundant industrial unit. Proposed construction of 5no. houses with associated parking.
3/2010/0934	Black Bull Hotel Church Street	Ribchester	2	0	16/12/2011	7 new dwellings. Developer is offering 49 & 50 Blackburn Rd as affordable dwellings - this does not contribute additional units to housing supply and is therefore double counting.
3/2011/0039	Land Hambleton View	Simonstone	1	1	3/2011/0039	Replacement of garages with terrace houses.
3/2009/1011	Land adj Petre House Farm Whalley Road	Langho	24	24	12/03/2012	Outline application (all matters except landscaping) for erection of affordable dwellings.
3/2011/0129	Victoria Mill Watt Street	Sabden	27	0	15/03/2012	Scheme is currently on hold due to market conditions - a new application for 43 units will be submitted in 2013. Affordable housing estimate is circa 13 units.
3/2010/0719	Land off Henthorn Road	Clitheroe	81	81	26/03/2012	Outline application. Current reserved matters application not submitted.
3/2011/0482	Brown Leaves Country Hotel	Copster green	5	5	03/04/2012	Outline for residential; quantum of development unknown. 18 dwellings estimated subsequently affordable contribution is an estimate.
3/2011/0247	Chapel Close	Low Moor	16	16	02/05/2012	Outline consent with Reserved matters now approved.
3/2011/0316	Preston road	Londridge	18	18	18/06/2012	Outline for erection of affordable units
3/2011/0776	Land at Whiteacre Lane	Barrow	2	2	22/08/2012	Outline for erection of affordable units
3/2010/0929	Land accessed between 36 & 38 Henthorn Rd	Clitheroe	8	8	18/09/2012	Demolition of garages & erection of affordable dwellings
3/2011/0541	Croft Way & Pasture Grove	Longridge	15	15	05/04/2012	Full consent for 49 units 34 market & 15 affordable
	Ash grove, Alder Drive, Elm Close & Willow Avenue	Whalley	13	13	12/09/2012	Full consent for 46 units 33 market & 13 affordable
TOTAL			268	216		

Appendix 2 – Sites with Planning Permission Analysis

Appendix 2 - Sites with Planning Permission Analysis							
SITE REF	SITE LOCATION	TOWNSHIP	SOURCE OF SUPPLY	SITE AREA (Ha)	LPA ESTIMATE REMAINING TO BE DEVELOPED	NJL ESTIMATE (5yr COUNT)	COMMENT
3/2011/0307	Hey Road & Ashburn Close	Barrow	Site with FPP	1.14	12	12	Approved 20th February 2012. Development started.
3/2011/0776	Land at Whiteacre Lane, Barrow	Barrow	Outline Consent	0.70	5	5	Awaiting S106.
Numerous Applications	Land off Dale View	Billington	Numerous Reserved Matters Consents	2.14	23	0	Approval dates back to 2000/2003. 26 units have been built out. Site area left is steep ground, potential delivery issues. An attempt was made to sell the remainder of the site in c. 2009/10 but without success, demonstrating the undeliverability of the site.
3/2011/0460	Land at Whalley New Road	Billington	Outline Consent	1.58	28	28	3/2010/0751 - consent at appeal - decision date 25th November 2011 3/2011/0460 - separate application submitted due to original refusal - approved 8th November 2011
3/2012/0629	Land off Chapel Close, Low Moor	Clitheroe	RMPP Pending	1.88	38	38	Reserved Matters application due for consideration 3/2012/0629 at Committee in November. 54 units (38 markets dwellings 16 affordable)
3/2010/0719	Land off Henthorn Road	Clitheroe	Outline Consent	8.27	189	159	Outline for 270 units (189 market, 81 affordable). Outline approved at Appeal (2161186). Reserved Matters coming forward imminently. Over estimation of dleivery supply within 5 years due to assumed development programme: Approximately 12 months to secure Reserved Matters; preperation work; first legal; then 60dpa (shared between TW & BDW). This would leave a residue at 5 years. Conservative estimate being 30 units (last phase of development so assumption of all market).
3/2010/0550	Former Barkers Garden Centre, Whalley Road	Clitheroe	Outline Consent	0.76	23	0	Outline for 32 units, 30 apartments of which 9 are affordable, 2 houses and 40 bed nursing home. Apartment scheme - no reserved matters application submitted. Widely reported issues with apartment market and financial issues facing nursing homes mean this scheme is unlikely to go ahead.
3/2010/0288 3/2011/0286	Primrose Road	Clitheroe	Site with FPP	0.48	0	0	Built out.
Numerous Applications	Primrose, Woone Lane	Clitheroe	Numerous Apps	1.04	78	78	Original outline application 3/2008/0526 consented for Maximum 162 dwellings. Recently consented application 3/2012/0394
3/2010/0756	Site of Rectella Works, Woone Lane	Clitheroe	Site with RMPP	0.68	34	34	Reserved matters 3/2012/0392.
3/2011/0482	Brown Leaves County Hotel, Longsight Road	Copster Green	Outline Consent	0.63	13	13	Outline Consent for 18 dwellings (13 market and 5 affordable).Demolition of the existing hotel and associated outbuildings and the subsequent redevelopment of the site for residential use. Outline consent received 3rd April 2012 - Subject to legal agreement. LCC contributions of £82,000 request (school x 6 pupils + waste management)
3/2010/0758	Palatine Cottages, Lancaster Cottages, Jubilee Cottages, Tough Road	Dunsop Bridge	Site with FPP	0.66	0	0	Built out.
3/2011/0541	Croft Way & Pasture Grove	Longridge	Site with FPP	2.02	43	34	Full consent for 34 market and 15 affordable dwellings - Ribble Valley have included the whole site in this section (NJL have included the Affordable Housing element in the Affordable Housing Analysis document).
3/2011/0316	Land at Preston Road	Longridge	Outline Consent	2.55	42	42	Outline consent granted 18 June 2012 subject to Legal Agreement. (Ecological issues delayed application).
Numerous Applications	Cheery Drive, Brockhall Village	Old Langho	Site with FPP	0.56	2	2	Numerous applications for a small site. Potentially built out.
3/2010/0103	Eden Gardens, Brockhall Village	Old Langho	Site with FPP	0.47	0	0	Full consent - small site, 6 units, 2 completed, 4 dwellings under construction. Potentially built out.
3/2010/0387	Land at Hillside, Brockhall Village	Old Langho	Site with FPP	0.41	1	1	Full consent - small site, 3 units,, 1 completed, 1 under construction, 1 remaining.
3/2011/0971	Mill Court & Cobden Close	Sabden	Site with RMPP	0.81	0	0	Reserved matters approved on 16 March 2012. Scheme advertised on Rightmove.
3/2011/0129	Victoria Mill, Watt Street	Sabden	Site with FPP	1.12	43	0	Consent for Demolition of part mill and conversion to apartments, conversion of former office building to 3 town houses, 4 affordable elderly bungalows, 23 affordable dwellings and 18 market dwellings. Approved 15 March 2012. Scheme is currently on hold due to market conditions - a new application for 43 units will be submitted in 2013.
3/2011/0837	Ash grove, Alder Drive, Elm Close & Willow Avenue	Whalley	Site with FPP	2.51	45	33	Full consent - 33 market and 13 affordable units.Ribble Valley have included the whole site in this section (NJL have included the Affordable Housing element in the Affordable Housing Analysis document).
3/2010/0820	Land North of Riddings Lane	Whalley	Outline Consent	2.12	56	56	Outline consent - approved at Appeal. (80units, comprising 56 market and 24 affordable homes).
3/2010/0202 3/2010/0216	The Grange, Ribchester Road	Clayton-le-dale	Site with FPP	0.87	0	0	Full application for conversion of Tabley Arms.
	TOTAL				675	535	

Our Ref: DM/jmb

19th November 2012

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For the attention of Paul Smith

Dear Mr. Smith

Re; Victoria Mills, Sabden

Further to our recent discussions, I can confirm our intentions on the above site, are to resubmit a new application to revise our approved scheme for 70 units.

We have not yet finalised our proposals, but following meetings with the planning and housing departments have support to amend the scheme to circa 45 units.

We intend to submit this scheme within the next 3 months.

Yours sincerely



David Morris
CEO