

320140784P

Land at Higgins Brook, East of Chipping  
Lane, Longridge

## Planning Statement

On Behalf of Barratt Homes (Manchester)

August 2014

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## LAND AT HIGGINS BROOK, EAST OF CHIPPING LANE, LONGRIDGE

### PLANNING STATEMENT

<b>Project Ref:</b>	23210/A5	23210/A5	23210
<b>Status:</b>	Draft	Draft	FINAL
<b>Issue/ Rev:</b>	01	02	03
<b>Date:</b>	28 July 2014	04 August 2014	11 August 2014
<b>Prepared by:</b>	VR	VR/LD	VR/LD
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Date: August 2014

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## 1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Barton Willmore, on behalf of Barratt Homes (Manchester) (a trading name of BDW Trading Ltd) ("The Applicant"), and is submitted in support of an outline planning application for the proposed residential led development of land at Higgins Brook, to the East of Chipping Lane, north of Longridge ("The Site"). This Statement should be read in conjunction with the suite of additional documentation submitted in support of the Application, which is referenced throughout.
- 1.2 This Statement sets out the reasons why the proposal is acceptable in principle. The justification and rationale for the illustrative layout of the proposed development and overall outline approach to the design of development on the Site is set out in comprehensive detail in both the Design and Access Statement ("DAS"), prepared by e\*SCAPE, and the Landscape and Visual Impact Assessment ("LVIA"), prepared by Tyler Grange.
- 1.3 This outline planning application presents the Applicant's Masterplan for large scale sustainable development on an area of land fully within its control. A separate detailed planning application was submitted to Ribble Valley Borough Council ("RBVC") in April of this year for the first phase of the wider development proposal. The proposal, known as Bowland Meadows, is for 106 dwellings and presently awaits determination by RVBC (Application Ref: 3/2014/0438).

### **Summary of the Proposed Development**

- 1.4 This planning application seeks outline approval, with all matters reserved apart from access, for the development up to 520 homes, including affordable housing and housing for the elderly, the relocation of Longridge Cricket Club to provide a new cricket ground, pavilion, car park and associated facilities, new primary school, vehicular and pedestrian accesses, landscaping and public open space.
- 1.5 Homes will vary in size and location from 2-bedroom mews to 5-bedroom detached properties to meet a range of needs. 30% of dwellings will be affordable and an element will be specifically designed for the elderly.

- 1.6 Significant areas of public open space and green infrastructure will serve the development and the general public, which will include local and neighbourhood equipped play areas, as well as more naturalistic parkland.
- 1.7 The site of the existing Longridge Cricket Club will be developed for housing and it is proposed to develop an entirely new, high quality facility for the Cricket Club, all developed to English Cricket Board ("ECB") standards.
- 1.8 A single entry primary school is included within the proposals, in order to provide for the needs of the proposed residential development and the wider needs of Longridge.
- 1.9 Two new points of vehicular access are proposed to Chipping Lane. A number of secondary points of pedestrian/cycle access will be provided from existing adjacent streets, including a new direct link to Sainsbury's supermarket. Two emergency access points are proposed.
- 1.10 The proposed development will be described in further detail below, and is also described in detail with the submitted DAS.

#### **Pre-Application Consultation**

- 1.11 The Applicant has engaged with officers and RVBC through a series of meetings and ongoing dialogue up to the submission of the planning application. A public consultation event was held to introduce the Applicant's proposals to local residents, local councillors, the press and the wider public. The Applicant has also engaged with a number of key stakeholders within Longridge and the surrounding area.
- 1.12 A detailed account of the consultation carried out by the Applicant is set out within the Statement of Community Involvement ("SCI"), prepared by Lexington Communications, which accompanies this planning application.
- 1.13 A meeting was held with Planning officers on 24 February 2014 in order to present the draft illustrative Masterplan for the Higgins Brook proposals and seek Officers' reaction and input. Officers then considered the proposals and discussed them with some consultees. By letter dated 16 April 2014 the Officer's wrote to the Applicant offering pre-application advice, together with comments that had been obtained from a number of consultees, including Lancashire County Council ("LCC")

Archaeology, Education, Highways, AONB officer and Waste and Minerals officer, the Environment Agency, Ribble Rivers Trust, United Utilities and Sport England. Where possible pre-application comments have been addressed by the submitted proposals and accompanying technical documents.

### **Environmental Impact Assessment**

1.14 A written request for a Screening Opinion was issued to RVBC on 24 March 2014. The letter stated that whilst the development proposals fall into Schedule 2 (Urban Development Projects) Section 10 (B) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, neither the Site nor the adjoining land is classified as a "sensitive area". The Screening request concluded that the proposed development would not result in significant effects, and is not considered to constitute EIA development. The Screening request was accompanied by a number of documents, including an assessment of the proposals against the selection criteria in Schedule 3 of the EIA Regulations, a preliminary ecological overview, a preliminary landscaping and visual overview and an agricultural land quality report.

1.15 RVBC formally responded by letter dated 15 April 2014 and concurred with this view, concluding as follows:

**"Having screened the proposal against the selection criteria in Schedule 3 and evaluated the potential significance of the likely environmental effects, including in cumulation with other development, the local planning authority is of the opinion that the proposed development is not likely to have significant effects on the environment and as such, is not EIA development within the meaning of the [EIA] Regulations."**

1.16 Due to the slight variation in the site area to include the cricket club land and due to the alteration to the parameters of the scheme to include the Primary School and Cricket Club, an updated Screening Opinion was submitted to the Council on 6<sup>th</sup> August 2014 to take account of any potential amendments to the scheme. As the scale of development has not altered significantly, it is not considered by the Applicant that the proposed development will constitute as EIA development.

## Planning Application Package

- 1.17 The validation requirements for this planning application were confirmed with officers through a combination of verbal and written communication. Table 1.1 provides a list of the documents submitted in support of this planning application.

*Table 1.1 – Planning Application Submission Documents*

Document	Prepared By
Planning application form and certificate	Barton Willmore
Design and Access Statement	e*SCAPE
Planning Statement	Barton Willmore
Economic Benefits Summary (BW Plus)	Barton Willmore
Landscape and Visual Impact Assessment	Tyler Grange
Landscape Strategy	Tyler Grange
Ecological Assessment Report	Tyler Grange
Tree Survey and Arboricultural Impact Assessment	Tyler Grange
Flood Risk Assessment and Drainage Appraisal	RSK
Transport Assessment	Vectos
Interim Residential Travel Plan	Vectos
Statement of Community Involvement	Lexington Communications
Phase 1 Site Investigation Report	Curtins
Energy Statement	Barratts
Noise Assessment	WSP
Air Quality Report	WSP
Draft Section 106 Heads of Terms	Barton Willmore
Affordable Housing Statement (incorporated into Planning Statement)	Barton Willmore
Site Location Plan	e*SCAPE

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Document	Prepared By
Constraints and Opportunities Plan	e*SCAPE
Illustrative Masterplan	e*SCAPE

## **2. SITE LOCATION AND DESCRIPTION**

- 2.1 This Section provides details of the Site's location and surroundings, and its key physical characteristics. Further details are provided in the supporting DAS which accompanies the Application.

### **Longridge**

- 2.1 The Site is on the northern edge of the town of Longridge within the administrative area of RVBC. Longridge is located 8 miles north-east of Preston, 9 miles south-west of Clitheroe and 7.5 miles north-west of Blackburn. The closest settlements include Grimsargh, 3 miles to the south-west, and Ribchester, 3.5 miles to the south-east.
- 2.2 Longridge lies at the crossroads of the B5269 Whittingham Road/Kestor Lane and the B6244 Preston/Derby Road. The M6 is located to the south-west, adjacent to Preston and is accessible from Longridge via the B6244, B6243 and B6242 using the junction at Preston East. The M55 to Blackpool, the M61 to Manchester and the M65 to Blackburn, Accrington and Burnley are all directly accessible from the M6 or adjoining main road networks. These major road networks make Longridge highly accessible to the wider region.
- 2.3 The settlement has grown organically over the years, with the expanded settlement boundary pattern being dictated by the presence to the immediate west of the Preston City Council / RVBC local authority boundary, resulting in extension in predominantly southern and eastern directions.
- 2.4 Longridge is categorised as a Principal Settlement within the emerging Ribble Valley Core Strategy and is home to around 30% of the Borough's population. The town contains an excellent level of local services and stands out as having one of the largest local centres in the Borough, alongside Clitheroe, reflecting the role of a key service centre serving a wider catchment. Longridge has a wide range of local shops, including two supermarkets, local schools (primary and secondary), health care facilities and employment opportunities. The town also benefits from its excellent road links to larger towns and cities in the North West, as described above.

**Site Context**

- 2.5 The Site of Higgins Brook sits against the current northern settlement edge of the town, immediately adjacent to the Sainsbury's supermarket and surrounding residential neighbourhoods. To the east lies Chipping Lane/Longridge Road and sports facilities serving Longridge cricket and football clubs. To the north is open countryside with the Forest of Bowland in the middle distance and to the west lies the outer suburbs of Longridge and beyond them Longridge fell.
- 2.6 The Site is connected back into Longridge via Chipping Lane/Inglewhite Road presently, and there is potential for the Site to be served by footpaths and cycleways from Sainsbury's car park, Redwood Drive/Thornfield Avenue and Willows Park Lane. Existing bus services stop on Chipping Lane, Inglewhite road and Willow Park Lane, and further bus services are available in the town centre.
- 2.7 The Site is only a few minutes' walk from the town centre. Many of the town centre uses are located on Berry Lane, which is 230 metres from the Site at its closest point; with further town centre uses located less than 600 metres from Site.

**Site Description**

- 2.8 The Site extends to 24.80 hectares ("ha") in area and is currently farmland in use for pasture. Field boundaries in the form of strong mature hedgerows define both the Site boundaries and also a series of field parcels within the Site itself. The hedgerows are a strong feature of the Site. A number of mature and semi-mature trees on the Site are principally confined to the field boundaries.
- 2.9 The Site appears overall to be relatively level, although it does rise up by 20 metres from the north-western corner towards Longridge. On-site topography is gently undulating with a series of drainage ditches located at the base of each hedgerow. The drainage ditches drain into Higgin Brook.
- 2.10 Higgin Brook emerges from a culvert adjacent to Sainsbury's supermarket in the south-western corner of the Site and flows in a north-easterly direction initially, along an established hedgerow, before flowing north-west, following another hedgerow, until it disappears into a culvert below the existing Cricket Club and drains north.

- 2.11 The Site drainage ditches flow into a number of on-site ponds, only two of which appear to hold water, with others having dried up.
- 2.12 A number of views are available into the Site. Long distance views to and from the Site can be had from the Forest of Bowland. Mid-distance views can also be experienced to and from Longridge Fell. Localised views are available into and out of the Site from the rear of existing residential properties on the northern fringes of Longridge. Chipping Lane forms the principal public frontage to the Site.

### **3. PROPOSED DEVELOPMENT**

#### **Introduction**

- 3.1 As described in Section 1 of this Statement, the Applicant is seeking to obtain outline planning permission for the development up to 520 homes, including affordable housing and housing for the elderly, the relocation of Longridge Cricket Club to provide a new cricket ground, pavilion, car park and associated facilities, a new primary school, vehicular and pedestrian accesses, landscaping and public open space. All matters are reserved with the exception of access, for which detailed approval is sought.
- 3.2 A presentation of the proposals is set out on the illustrative Masterplan and the process of the development of the Masterplan is described at length within the supporting DAS, prepared by e\*SCAPE. Further details of the landscape strategy and ecological enhancement measures are presented within the relevant Tyler Grange documents. Information relating to the outline site draining strategy is presented within the Drainage Appraisal prepared by RSK.

#### **Development Details**

- 3.3 The Site is 24.80 ha in area and will include 13.81 ha of residential development and 10.99 ha of green infrastructure, which will include hedgerows, woodlands, wetlands and grasslands, incorporating naturalistic play areas, footpaths/cycleways and nature trails.
- 3.4 Set within the green infrastructure will be the replacement cricket ground facility for Longridge Cricket Club, over approximately 3.5 ha, and a new primary school on area of approximately 1.2 ha.
- 3.5 This is an outline application, consequently the development parameters are focused on establishing the strategic design objectives for the Site. Whilst the Masterplan is illustrative, for indicative purposes only, it demonstrates the Site's capacity to accommodate the homes and complementary uses proposed in a high quality landscape led development.

*Housing*

- 3.6 It is proposed that circa 520 homes can be accommodated on this Site with the primary focus being on the delivery of family housing, providing predominantly 3 and 4 bedroom homes, with some larger 5 bedroom properties. Some smaller 2 bedroom homes and elderly bungalows will also be provided. Whilst the specific scale and mass of the buildings is not yet determined, the character of the neighbourhood that is to be created lends itself to principally 2-storey (between 8 and 10 metres to ridgeline) development, based on local vernacular. Any increase in scale (up to 3-storey) would be delivered at principle junctions as opposed to the more sensitive extremities of the Site.
- 3.7 The net average density on the Site would be 39 dwellings per hectare ("dph"), with a gross density of 21 dph. The illustrative Masterplan shows a range of densities across the Site, where higher densities (approximately 45 dph) are experienced at the key focal points of squares and mews, forming enclosure at various locations across the development. Density reduces gradually towards outer edges of the development where properties sit adjacent to the green infrastructure network and overlook the countryside (25-35 dph).
- 3.8 The DAS describes the approach of establishing a series of character areas, which utilise existing site boundaries and local features. These areas will be informed by a pallet of materials and colours used within the public realm and built form, as well as landscape features such as hedgerows, woodland stands and wetlands.

*Affordable Housing*

- 3.9 The Applicant proposes that 30% of the dwellings to be delivered on Site will be affordable. The location, type, tenure and mix will be determined at the reserved matters stage. The Applicant has already secured interest from at least two potential partners to deliver affordable housing on the Site, both of which have experience of delivering affordable housing in Ribble Valley. The provision of affordable housing will be distributed around the Site, in accordance with the providers operational requirements, and will be indistinguishable, in terms of quality and design, from the open market housing when detailed at the reserved matters stage.

*Housing for the Elderly*

- 3.10 The illustrative Masterplan provides for a number of bungalows to be made available for elderly groups. The overall level of accommodation specifically for the elderly will be the subject of negotiation with RVBC and the selected provider(s) and would be delivered in the most accessible locations around the Site. A proportion of the elderly accommodation will be affordable.

*Access and Movement*

- 3.11 The illustrative Masterplan shows a number of proposed access points to the Site from the surrounding area. The vehicular points of access will be from Chipping Lane, details of which are included for consideration at the outline stage.
- 3.12 A number of secondary points of pedestrian and cycle access (9 in total) off the existing streets, including from Redwood Avenue and Willows Park Lane will ensure that the proposals are integrated and accessible by non-car modes. One of the pedestrian/cycleway links is proposed directly with Sainsbury's supermarket.
- 3.13 Emergency access will be required to serve a site of this scale. Two emergency access points are proposed, one at the eastern most end of Redwood Drive and the other on the junction with Willow Park Lane and Chaigley Road. The latter will also form a permanent access to Willow Farm.
- 3.14 Car parking for the residential development will be a mixture of on-street and on-plot (some frontage, some to the side of properties and some garaged), in line with guidance from Manual for Streets.
- 3.15 The DAS provides detailed commentary on the rationale behind the internal illustrative layout and movement strategy, which aligns with the landscape led design approach that follows Site contours and field boundaries and provides robust links between the green spaces and infrastructure. The footway and cycleway links have been chosen to ensure good connectivity with surrounding uses, such as the supermarket, bus stops and the wider town centre.

*Public Open Space*

- 3.16 A good proportion of the Site will be given over to use as public open space, providing a wide range of play and informal recreational experiences to encourage an active and healthy lifestyle and offering connections to the surrounding town and formal sports opportunities.
- 3.17 Two children's play areas are proposed within the development in the form of a Locally Equipped Area for Play ("LEAP") and a larger Neighbourhood Area for Play ("NEAP"). They will be located a suitable distance from surrounding properties, whilst being a focal point for the community with good levels of passive supervision to encourage independent play.

*Cricket Ground*

- 3.18 The proposals include an entirely new cricket ground facility for Longridge Cricket Club in the northern portion of the Site. The existing facilities are modest in scale and the strong membership of the Club, and wider community, would benefit significantly from new facilities that provide for its present and future needs.
- 3.19 The pitch will be designed to ECB standards, providing 12 wickets and an outfield of greater and more symmetrical proportions than the existing facility. A new pavilion, practice nets, storage facilities and car park, accessed from the existing Cricket Club access, will all form part of the proposals.
- 3.20 The new Cricket Club facilities will be located within the green infrastructure to the north of the Site and will be suitably landscaped with strong, tree planted edges helping to blend the wider Site into the rural perimeters. Pedestrian / cycleway routes will link the facility to the adjacent housing development.

*Primary School*

- 3.21 A new single form entry primary school will be developed to the north of the Site and to the east of the proposed Cricket Club facilities. The school will provide sufficient capacity for circa 210 pupils, ensuring that the primary education needs of the housing development are provided for in a highly sustainable manner and without impacting upon the capacity of schools elsewhere in Longridge.

- 3.22 Circa 1.2 ha of land has been set aside for the school and its facilities, which will include access suitable for service vehicles and coaches, a play ground and play pitches, all within a private, landscaped setting.

*Ecological Enhancement*

- 3.23 A number of ecological enhancement measures are proposed and include: the retention and management of existing ponds and provision of additional wildlife ponds; creation of rough margins to fields; establishment of low intensity grazing regimes which will improve the floral diversity of exiting grass sward and bird and bat boxes will be erected on mature trees where appropriate. A sustainable drainage system ("SUDS") will also form part of the proposals.

## 4. PLANNING POLICY CONTEXT

### Introduction

- 4.1 This Section establishes the appropriate basis for decision taking in respect of this planning application, having regard to the adopted and emerging Development Plan for Ribble Valley, national planning policy and relevant precedent.

### The Development Plan

- 4.2 In having regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise, the development plan in this case consists of the saved policies of the Ribble Valley Districtwide Local Plan 1998 ("Local Plan").
- 4.3 The Local Plan was programmed to run until mid 2006, to match the timescale of the Lancashire Structure Plan review 1991-2006. Whilst the Local Plan is therefore time-expired, a number of its policies have been saved by Direction of the Secretary of State, from 2007, until such time that they are replaced by a new Plan, or by a combination of development plan documents.
- 4.4 At the outset we highlight that the application Site lies outside the settlement boundary of Longridge, as identified on the adopted Local Plan Proposals Map; it is, therefore, contrary to adopted Local Plan policies relating to the supply and location of housing (policy H2). Accordingly, it is necessary to consider whether there are other material considerations indicating that an alternative conclusion can be reached and the granting of planning permission justified.
- 4.5 The National Planning Policy Framework ("NPPF") is a material consideration which local planning authorities must take into account in decision taking.<sup>1</sup> The NPPF states that, in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.<sup>2</sup> This means, for decision taking, that where relevant policies of the development plan are out-of-date, planning permission should be granted unless any adverse

<sup>1</sup> Paragraphs 2 and 212, NPPF

<sup>2</sup> Paragraphs 49 and 197, NPPF

impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole, or specific policies in the NPPF indicate that development should be restricted.<sup>3</sup>

- 4.6 The Local Plan's policies relating to the delivery of housing are out-of-date. This is not only by virtue of the passage of time since their adoption, but also the fact that the evidence base underpinning those policies is also out-of-date and has since been superseded. The reasons for this are highlighted in detail later in this statement. This position has been accepted by RVBC, Inspectors and the Secretary of State in recent appeals; namely Land off Waddington Road, Clitheroe<sup>4</sup> and Land to the South-West of Barrow and West of Whalley Road, Barrow<sup>5</sup>.
- 4.7 The NPPF is a material planning consideration of significant weight and, therefore, in circumstances where relevant development plan policies are out-of-date requires that planning permission should be granted unless there are significant and demonstrable reasons for not doing so.<sup>6</sup>
- 4.8 In this Statement we consider that position having regard to the saved policies of the Local Plan that remain relevant. We also consider the weight to be attached to the emerging Core Strategy, as a material consideration, which is intended to replace the Local Plan's strategic policies, especially relating to the quantum and broad distribution of housing development.

### **Material Considerations**

#### NPPF

- 4.9 The NPPF was published in March 2012. It represents a step change in national policy which is more positive towards sustainable development and growth.

#### *Weight attributed to Development Plans*

- 4.10 Annex 1 provides confirmation that the policies of the NPPF apply from the day of publication and are a material consideration in planning decisions. It confirms the status of the development plan when determining planning applications, and that developments which accord with an up to date development plan should be

<sup>3</sup> Paragraph 14, NPPF

<sup>4</sup> Appeal Reference: APP/T2350/A/13/2190088

<sup>5</sup> Appeal Reference: APP/T2350/A/13/2194601

<sup>6</sup> Paragraph 14, NPPF

approved. The NPPF makes clear that it is desirable that local planning authorities should have an up-to-date plan in place.<sup>7</sup>

4.11 The NPPF highlights that decision-takers may give weight, unless material considerations indicates otherwise, to emerging plans according to:

- The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to the relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF (the closer the policies in the emerging plan to the policies in the NPPF, the greater the weight that may be given).<sup>8</sup>

#### *Sustainable Development*

4.12 The NPPF states that one of the main objectives of the planning system is to contribute to the achievement of sustainable development<sup>9</sup>. There are three dimensions to sustainable development: economic, social and environmental, each giving rise to the need for the planning system to perform a number of roles.<sup>10</sup>

4.13 Furthermore, the NPPF outlines that sustainable development involves seeking positive improvement in the quality of the built, natural and historic environment, as well as in people's quality of life. This includes making it easier for jobs to be created in urban areas, improving design and the conditions in which people work.

4.14 We highlight above the meaning of the presumption in favour of sustainable development in the context of policies that are up-to-date or otherwise. To clarify in the full context, for decision taking, the presumption in favour of sustainable development means:

<sup>7</sup> Paragraph 12, NPPF

<sup>8</sup> Paragraph 216, NPPF

<sup>9</sup> Paragraph 6, NPPF

<sup>10</sup> Paragraph 7, NPPF

**“Approving development proposals that accord with the development plan without delay; and**

**Where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless:**

- **Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole; or**
- **Specific policies in this Framework indicate development should be restricted”<sup>11</sup>.**

4.15 There are 12 Core Planning Principles contained within the NPPF that should underpin both plan-making and decision-taking, which include ensuring that planning proactively drives and supports sustainable development. Of relevance, it confirms that the planning system should facilitate sustainable economic development to deliver homes and businesses to help drive the country forward.<sup>12</sup>

#### *Housing*

4.16 In relation to Housing, the NPPF states that in order to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area; and, identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under deliver of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.<sup>13</sup>

4.17 Planning applications for housing development should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the

<sup>11</sup> Paragraph 14, NPPF

<sup>12</sup> Paragraph 17, NPPF

<sup>13</sup> Paragraph 47, NPPF

supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.<sup>14</sup>

*Good Design*

- 4.18 The importance of good design is a requirement of the NPPF and it is identified as a key aspect of sustainable development that is indivisible from good planning.<sup>15</sup>
- 4.19 Developments should function well and add to the overall quality of the area, not just for the short term, but over the lifetime of the development. They should establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places. The potential of a development site should be optimised, to create and sustain an appropriate mix of uses, including green space and public open space, and support local facilities and transport networks. Developments should also respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. Environments that are created should be safe and accessible, addressing the potential for crime and disorder, or the fear of crime. Developments should be visually attractive through good architecture and appropriate landscaping.<sup>16</sup>

*Conserving the Natural Environment*

- 4.20 When determining planning applications the NPPF requires local planning authorities to aim to conserve and enhance biodiversity by applying a number of principles; including mitigation where significant harm would result from development; encouraging opportunities to incorporate biodiversity in and around developments<sup>17</sup>.
- 4.21 The NPPF confirms that planning decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development.<sup>18</sup>

<sup>14</sup> Paragraph 49, NPPF

<sup>15</sup> Paragraph 56, NPPF

<sup>16</sup> Paragraph 58, NPPF

<sup>17</sup> Paragraph 118, NPPF

<sup>18</sup> Paragraph 123, NPPF

*Decision Taking*

- 4.22 The NPPF states that local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development<sup>19</sup>, to look for solutions rather than problems, and seek to approve applications for sustainable development.<sup>20</sup>
- 4.23 In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.<sup>21</sup>

Laying the Foundations: A Housing Strategy for England

- 4.24 In November 2011, the Government published its Housing Strategy, which sets out a Strategy to deliver new homes for all. It makes clear the need to get the housing market moving, and to offer choice, flexibility and affordable housing. It also confirms that house building is crucial to economic growth.

**Applicable Development Plan Policy**

- 4.25 Having established the context for the determination of the development proposals, we now identify the relevant saved policies of the Local Plan, in Table 4.1 below, which can be taken into account in the decision making process. According to the Local Plan Proposals Map, the Site is outside, but immediately adjacent to the main settlement boundary of Longridge. The Site is therefore within the open countryside, but is otherwise undesignated. We have already established that Local Plan policies relating to the supply of housing are out of date and should be afforded very little weight. Notwithstanding this, the relevant policies are identified for information purposes only. Given that various policies that are non-specific to housing restrict development outside settlement boundaries to a limited range of circumstances, such as policies G2 and G5, we similarly afford these policies little weight, but, again, they are identified within Table 4.1 for completeness.

<sup>19</sup> Paragraph 186, NPPF

<sup>20</sup> Paragraph 187, NPPF

<sup>21</sup> Paragraph 197, NPPF

Table 4.1: Relevant Local Plan Policies

Policy	Summary
<p>Policy G1 Development Control</p>	<p>Requires all development proposals to provide a high standard of building design and landscape quality, setting out applicable criteria relating such matters as: size, intensity and nature; the impact of traffic generation and the public transport network; car parking; density, layout and the relationship between buildings; servicing and utilities; daylight and privacy; use of materials; open space and playing fields; impact on biodiversity; and protection of watercourses.</p>
<p>Policy G2 Wilpshire, Clitheroe, Billington, Longridge and Whalley</p>	<p>This policy states that development will be mainly directed towards land within main settlement boundaries as identified on the Proposals Map. The policy confirms that for Longridge development will be approved wholly within the built part of the settlement or the rounding-off of the built-up area.</p>
<p>Policy G5 Outside the main settlements</p>	<p>Outside main settlement boundaries planning consent will only be granted for small scale developments which are: i) essential to the local economy or the social well being of the area; or ii) needed for the purpose of agriculture or forestry; or iii) for local needs housing; or iv) small scale tourism and recreational development appropriate to a rural area; or v) other small scale uses appropriate to a rural area which conform to the policies of the Local Plan.</p>
<p>Policy G11 Crime prevention</p>	<p>The Council will take account of the need to design, layout and landscape development in a manner which makes crime more difficult to commit, increases the risk of detection and provides people with a more secure environment.</p>
<p>Policy ENV3</p>	<p>In the open countryside, outside the AONB and areas immediately adjacent to it, development will be required to be</p>

Policy	Summary
Open Countryside	in keeping with the character of the landscape area and should reflect local vernacular, scale, style, features and building materials.
Policy ENV6 Agricultural Land	The Council will safeguard the best and most versatile agricultural land (as classified by the Ministry of Agriculture) unless it can be shown that the need for development overrides agricultural considerations.
Policy ENV7 Species Protection	Development proposals that have an adverse effect on wildlife species protected by law will not be granted planning permission, unless arrangements can be made through planning conditions or agreements to secure protection of the species.
Policy ENV10 Nature Conservation	Where permission is granted for development affecting the nature conservation value of sites, conditions may be imposed or agreements sought to avoid damage to wildlife habitats or physical features of interest, secure retention or enhancement of wildlife habitats, and in appropriate cases require re-creation of habitats once the development has ceased.
Policy ENV13 Landscape Protection	The Council will refuse development proposals which harm important landscape features, including traditional stone walls, ponds, characteristic herb rich meadows and pastures, woodlands, copses, hedgerows and individual trees other than in exceptional circumstances where satisfactory works of mitigation or enhancement would be achieved, including rebuilding, replanting and landscape management.
Policy ENV16 Conservation Development Control	The desirability of preserving or enhancing the character and appearance of a conservation area will be a material consideration in deciding development proposals outside the designated area which would affect its setting or views into or

Policy	Summary
	out of the area.
<p>Policy H2 Dwellings in the Open Countryside</p>	<p>Outside settlement boundaries residential development will be limited to 1) that essential for the purposes of agriculture or forestry or other uses appropriate to the rural area; 2) appropriate conversion of buildings; and 3) development specifically intended to meet a provide local need. The policy states that the impact of proposals on the countryside will be an important consideration in determining all applications. Development should be appropriately sited and landscaped and the scale, design and materials used must reflect the character of the area.</p>
<p>Policy H19 Housing Needs: Large sites in Main Settlements</p>	<p>The Council will promote the provision of affordable housing throughout the Borough in areas where need is clearly identified. This will be achieved by negotiating a proportion of affordable housing.</p>
<p>Policy RT8 Open Space Provision</p>	<p>On all sites over 1 hectare the layout will be expected to provide adequate and useable public open space. The policy states that levels of provision will be based on figures provided in relation to policy RT9 of the Local Plan; however, policy RT9 has not been saved.</p>
<p>Policy T1 Transport and Mobility</p>	<p>The Council will attach considerable weight to: the availability and adequacy of public transport to serve the development; the relationship between the site and the primary route network; the provision made for access to the development by pedestrians, cyclists and those with reduced mobility; and proposals which locate developments in areas which maintain and improve choice for people to walk, cycle or catch public transport rather than drive between homes and facilities which they need to visit regularly.</p>

Policy	Summary
Policy T7 Parking Provision	Development proposals will be required to provide adequate car parking and servicing space.

**Core Strategy: A Local Plan for Ribble Valley – Submission Draft**

- 4.26 The emerging Core Strategy is a material consideration, albeit it can be afforded only limited weight at this moment in time, which has been confirmed in the Secretary of State decisions referred to in paragraph 4.6 above.
- 4.27 The Core Strategy (“CS”) was originally submitted for Examination in 2012, but the examination process was suspended following concerns raised by the appointed Inspector. Following a number of changes to the CS and further consultation, the examination eventually re-opened and Hearing Sessions took place in January 2014. Following closure of the Hearing Sessions the Inspector wrote to RVBC, by letter dated 31 January 2014, setting out a number of concerns over the soundness of the CS. The matters raised by the Inspector related to:
- a) The failure of the CS to meet the full, objectively assessed needs for housing;
  - b) The lack of justification for the grouping of proposed second tier settlements and the lack of certainty over the distribution of housing to those settlements; and
  - c) The lack of justification for re-allocating 200 homes through the ‘Longridge adjustment’ to second tier settlements.
- 4.28 RVBC responded to the Inspector by letter dated 5 February 2014 confirming that further work would be undertaken leading to main modifications to the CS. In May 2014 RVBC published a set of proposed modifications to the CS, which were subject to a 6-week consultation period.
- 4.29 Whilst a number of modifications are proposed to the CS, the modifications of principal relevance here include the proposal to increase the annual housing requirement from ‘at least 250’ to ‘a target of 280 dwellings’. The modifications also

now include a distribution of dwellings to a new hierarchy of Tier 1 Villages, which are considered by RVBC to be the most sustainable of the 32 defined settlements, where previously the CS did not seek to identify locations for growth in the rural area. The Longridge adjustment remains, but the residual housing requirement for Longridge is proposed to rise from 550 to 633 dwellings over the Plan period.

- 4.30 The Applicant, along with others, has maintained an objection to the CS despite the proposed modifications. In short, the Applicant considers the overall housing requirement to be insufficient to meet the full, objectively assessed needs of the Borough. The Examination Inspector was very clear in advising RVBC that the housing requirement should be **at least** 280 dwellings per annum, as opposed to 280 dwellings per annum being merely a target. This suggests that the actual figure should be in excess of 300 dpa would be more aligned with the Inspector's recommendations and align with the "Policy On" economic growth scenarios, and help to "boost significantly the supply of housing" in line with NPPF objectives.
- 4.31 The approach of the CS to distributing new housing development clearly favours concentration in the Principal Settlements of Clitheroe, Longridge and Whalley by means of a split commensurate with each settlements proportion of the Borough's population. Whilst this can be used as a guide to likely housing numbers apportioned to Longridge in the emerging CS, the final figure will be largely dependent on the work currently being undertaken by RVBC in relation to the allocation of housing to the Principal and second tier settlements.
- 4.32 The previously amended submission CS proposed that land needed to be found for 550 net additional dwellings in Longridge over the plan period to 2028<sup>22</sup>. This was based on the need for 250 dwellings per annum. We know that the annual requirement needs to be increased to a minimum of 280 dwellings per annum in order for the CS to meet housing needs. In terms of distribution, whilst this is still to be determined it would be wrong of RVBC to direct even more housing in the less sustainable second tier settlements than is currently proposed. On this basis there is the potential for the additional housing requirement to be absorbed by the more sustainable, principal settlements. For Longridge this is likely to result in a requirement to release land for well in excess 700 dwellings over the plan period,

<sup>22</sup> Paragraph 15.2, Submission Core Strategy with post Regulation 22 changes (tracked version)

the vast majority of which would need to be delivered through the release of sustainable Greenfield sites outside existing settlement boundaries.

- 4.33 Notwithstanding the limited weight to be attributed to the policies of the CS at this time, Table 4.2 sets out the draft policies that could be of relevance:

*Table 4.2: Relevant Emerging Core Strategy Policies*

Policy	Summary
<b>Key Statements</b>	
Key Statement DS1: Development Strategy	The majority of new housing development will be concentrated within an identified strategic site to the south of Clitheroe and the principal settlements of Clitheroe, Longridge and Whalley.
Key Statement DS2 Presumption in favour of sustainable development	When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. The policy reflects the wording of paragraph 14 of the NPPF.
Key Statement EN2 Landscape	The Council will expect development to be in keeping with the character of the landscape, reflecting local distinctiveness, vernacular style, scale, features and building materials.
Key Statement EN3 Sustainable Development and Climate Change	The Council will seek to ensure that all development meets an appropriate recognised sustainable design and construction standard where viable. All development will be required to demonstrate how it will contribute towards reducing the Borough's carbon footprint. The Council will assess applications against the current Code of Sustainable Homes, Lifetime Homes and Buildings for Life and BREEAM standards. Further requirements of the Key Statement include the adoption of sustainable development principles, construction methods and drainage principles within development; the

Policy	Summary
	need for conservation of biodiversity and green infrastructure; and minimising the use of energy through design and addressing of the potential for flood risk.
Key Statement EN4 Biodiversity and Geodiversity	The Council will seek to conserve and where possible enhance biodiversity and geodiversity. Negative impacts should be avoided or mitigated.
Key Statement H1 Housing Provision	Land for residential development will be made available to deliver 5,000 dwellings, 250 per annum, over the period 2008-2028.
Key Statement H2 Housing Balance	Requires a suitable mix of housing in accordance with the SHMA and housing needs surveys.
Key Statement H3 Affordable Housing	The Council will seek affordable housing provision at 30% of the units on site for developments of 10 units or more or site of 0.5ha or more. Through negotiations, 15% of units will be sought for elderly, 50% if which would be affordable.
Key Statement DMI1 Planning Obligations	Sets out the requirement for planning obligations covering matters of affordable housing, improvements to highway safety, open space and education.
Key Statement DMI2 Transport Considerations	New development should be located to minimise the need to travel and incorporate good access by foot and cycle and have convenient links to public transport.

Policy	Summary
<b>Development Management Policies</b>	
<p>Policy DMG1</p> <p>General Considerations</p>	<p>Includes the requirement for development proposals to: be of a high standard of design; be sympathetic to existing and proposed land uses; consider potential traffic and car parking implications; ensure safe access; consider daylight and privacy distances; consider implications for biodiversity and protected species; have regard to public safety and security; consider the density, layout and relationship between buildings; protect the amenities of the surrounding area; protect open space; use sustainable construction techniques; incorporate code for sustainable homes and lifetime homes;</p>
<p>Policy DMG2</p> <p>Strategic Considerations</p>	<p>Development should be in accordance with the Development Strategy of the CS. Proposals in defined settlements should consolidate, expand or round-off development so that it is closely related to built-up areas, ensuring it is appropriate in scale. Outside settlements development is restricted to a limited number of purposes. Reference is made within the policy to the fact that settlement boundaries will be updated in subsequent DPDs.</p>
<p>Policy DMG3</p> <p>Transport and Mobility</p>	<p>Consideration is given to the availability and adequacy of public transport and associated infrastructure; relationship to the primary and strategy road network; provision of access for pedestrians, cyclists and those with reduced mobility; accessibility by means other than the private car; the choice for people to walk, cycle and catch public transport between homes and facilities that are needed regularly; and the provision of car parking.</p>
<p>Policy DWM2</p> <p>Landscape and</p>	<p>Development proposals which significantly harm important landscape or landscape features will be refused.</p>

Policy	Summary
<p>Townscape Protection</p>	
<p>Policy DME3 Site and Species Protection and Conservation</p>	<p>Development that is likely to adversely affect protect species, SSSIs, priority habitats or species identified in the Lancashire biodiversity action plan, local nature reserves, county biological heritage sites; special protected areas and any acknowledged nature conservation value of sites, will be refused. Measures to enhance biodiversity will be encouraged.</p>
<p>Policy DME5 Renewable Energy</p>	<p>Residential developments of 10 or more units will be requested to provide at least 10% of their predicted energy requirements from decentralised and renewable or low carbon sources.</p>
<p>Policy DMH1 Affordable Housing Criteria</p>	<p>Sets out groups of people for whom affordable housing should be provided. Within the negotiations for housing developments, 15% of the units will be for elderly provision and within this 15% figure, a minimum of 50% would be affordable and be divided within the overall affordable housing threshold of 30%. The remaining 50% will be more market housing for elderly groups.</p>
<p>Policy DMH3 Dwellings in the open countryside and AONB</p>	<p>Residential development within the open countryside and AONB will be only be permitted in a limited range of circumstances, including for agricultural or forestry needs, conversions and replacement dwellings.</p>
<p>Policy DMB4 Open Space Provision</p>	<p>On residential sites of over 1ha, the layout will be expected to provide adequate and useable public open space and the Council will seek to secure an off-site contribution towards provision for sport and recreation facilities.</p>

## Conclusions

- 4.34 Whilst the policies of the Local Plan, outlined above, are a material consideration in the determination of this planning application, those relating to the supply of housing are out-of-date having been prepared some time ago and under a very different national planning policy regime, which did not take account of the need to meet the full, objectively assessed housing needs of the area, nor the need to boost significantly the supply of housing.
- 4.35 The housing policies of the Local Plan are also out-of-date by virtue of the failure of RVBC to be able to demonstrate a 5-year supply of deliverable housing sites<sup>23</sup>, which is discussed in further detail in the following section.
- 4.36 Accordingly, the proposed development should be determined in the context of the presumption in favour of sustainable development as set out in the NPPF, and Government policies promoting housing and economic growth. The starting point in the decision-taking process, therefore, is that planning permission should be granted for development unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. It is important to emphasise at this juncture that in undertaking this exercise, if the weighing of benefits against harm is finely balanced or there are adverse impacts that are deemed to outweigh the benefits, planning permission should still be granted. The NPPF clearly requires any adverse impacts to *significantly* and *demonstrably* outweigh the benefits of development, not merely outweigh them; consequently there should be a significant margin between the adverse impacts that are deemed to have been identified.

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<sup>23</sup> Paragraph 49, NPPF

## 5. HOUSING LAND SUPPLY

5.1 It is the Applicant's consideration that the housing policies of the Local Plan are out-of-date by virtue of the failure of RVBC to be able to demonstrate a 5-year supply of deliverable housing sites<sup>24</sup>. This section sets out the Applicant's position on the five year housing land requirement and supply in Ribble Valley and demonstrates that the Council are unable to demonstrate a five year supply of housing.

### National Planning Policy

#### NPPF

- 5.2 As set out in Section 4, the NPPF<sup>25</sup> sets out a requirement for local planning authorities to "boost" significantly the supply of housing<sup>26</sup>. This means identifying and updating annually a supply of specific deliverable sites to provide a five year supply of housing against their housing requirements, with an additional buffer of 5% to ensure there is choice and competition in the market for housing. Where there has been a record of persistent under delivery of housing, this buffer should be increased to 20% to provide a realistic prospect of achieving the supply, and to ensure choice and competition in the market.
- 5.3 Furthermore, the NPPF sets out the requirement that housing applications should be considered in the context of sustainable development and that relevant policies should not be considered up-to-date if a local planning authority cannot demonstrate a five year supply of deliverable housing sites.
- 5.4 The NPPF considers that for sites to be considered deliverable<sup>27</sup> they should be:
- **available now;**
  - **offer a suitable location for development now; and**
  - **be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.**

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<sup>24</sup> Paragraph 49, NPPF

<sup>25</sup> Paragraph 47, NPPF

<sup>26</sup> Paragraph 47, NPPF

<sup>27</sup> Footnote 11, NPPF

- 5.5 Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

*Planning Practice Guidance (PPG)*

- 5.6 The PPG was published in March 2014. It contains guidance on five year supply housing assessments, and sets out in paragraph 033 (Ref: ID 3-033-210140306) that LPAs should be:

**“Updating evidence on the supply of specific deliverable sites sufficient to provide five years worth of housing against housing requirements”**

- 5.7 It states that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. It continues to state that the demonstration of a five year supply is a key material consideration when determining housing applications.
- 5.8 The PPG also sets out information in Section 3 on the following relation to student accommodation, housing for older people (Use Class C2) and that it should be counted against the housing requirement, and any undersupply of housing should be dealt with in the first five years of the plan period where possible. However, this should be reflected in both the FOAN and housing land supply position.
- 5.9 The PPG also sets out guidance on what constitutes a “deliverable” site, and sets out the need for LPAs to provide robust, up-to-date evidence to support the deliverability of the site. Deliverable sites can include those allocated for housing and sites within planning permission, unless there is clear evidence that schemes will not be implemented within five years. It is also considered that a “developable” site are those which are in a suitable location for housing development and have a reasonable prospect that the site is available and could be viably developed.

### **Ribble Valley Five Year Housing Land Supply Position**

- 5.10 It is the Council's contention that it can demonstrate a five year housing land supply. The Applicant disagrees with this position.
- 5.11 The latest housing land supply position is set out in the "Housing Land Availability Statement – April 2014", which sets out two different scenarios, based on a requirement of 250 dwellings and a requirement of 280 dwellings (per annum). It is an accepted position that the "Sedgefield Method" is the most appropriate, as confirmed by the Planning and Development Committee in October 2013, and within recent Appeal Decisions and confirmed by the PPG which seeks to deal with undersupply in the first five years of the plan period.
- 5.12 The base date of the Council's Land Availability Statement is 1<sup>st</sup> April 2014 and the relevant five year period is therefore 1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2019.
- 5.13 We disagree with the Council's calculation and inclusion of sites within the five year supply and do not consider it to be robust, as set out below.

### **Full Objectively Assessed Needs ("FOAN")**

- 5.14 As set out above and in Section 4, the NPPF<sup>28</sup> sets out the requirement for LPAs to
- "use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area".**
- 5.15 As detailed in Section 4, in the Inspector's letter to RVBC on 31<sup>st</sup> January 2014, it was confirmed that RVBC were pursuing a low growth housing target, which would not meet the objectively assessed needs of the Borough and the economic growth strategy of the Local Plan would not be delivered.
- 5.16 It is considered by the Applicant and the Inspector during the EIP that 280 dpa was the "minimum" level of housing growth required to deliver the 100 jobs per annum growth aspiration. This is a matter of ongoing debate, however it is firmly accepted

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<sup>28</sup> Paragraph 47, NPPF

by the Inspector that the 250 dpa figure used by RVBC is not sufficient to meet the future growth needs of the Borough.

- 5.17 Within the Applicant's representation to the Core Strategy, Barratt Homes recommended that a housing requirement of or in excess of 300 dpa expressed as an "at least" figure was more appropriate to help meet the full objectively assessed needs of the Borough, and help meet the "Policy On" economic growth scenarios discussed in Section 4.

#### **Application of 20% buffer**

- 5.18 Paragraph 47 of the NPPF sets out that LPA's should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of supply with an additional buffer of 5% to ensure choice and competition and where there is a record of persistent under delivery of housing, LPA's should provide a buffer of 20% to provide a prospect of achieving the planned supply and to ensure choice and competition.
- 5.19 RVBC is confirmed as being a 20% authority as they have failed to achieve the required number of dwelling completions when compared against either the 250 dpa or 280 dpa figure as shown in the table below.

*Table 5.1: LPA completions table*

<b>Year</b>	<b>No of completions</b>	<b>Shortfall against 250 dpa</b>	<b>Shortfall against 280 dpa</b>
2008/09	75	175	205
2009/10	89	161	191
2010/11	69	181	211
2011/12	147	103	133
2012/13	172	78	108
2013/14	183	67	97
<b>Overall</b>	<b>735</b>	<b>765</b>	<b>945</b>

- 5.20 This persistent under-delivery demonstrates that a 20% buffer is required to be applied, in accordance with paragraph 47 of the NPPF.

5.21 This position is recognised by RVBC and the shortfall in supply is contained in the replicated tables below on which the LPA base their housing land supply position on.

*Table 5.2: LPA's five year supply position based on 250 dpa*

Based on a requirement of 250 dpa using Sedgefield Method

A	Planned Provision 2008- 2028	5,000
B	Annual equivalent	250
C	Five Year Requirement (B x 5)	1,250
D	Plus 20% buffer (B + C)	1,500
E	Completions 1/4/2008 – 31/3/2014	735
F	Shortfall [(6 X B) – E]	765
G	Total Five Year Requirement (D + F)	2,265
H	Annual Requirement (G/5)	453

Identified Supply as of 31<sup>st</sup> March 2014

Sites subject to S106 Agreements		1,206
Sites with planning permission		1,907
Affordable Units not started		587
	Sub Total	3,700
Less sites not deliverable		143
Less dwellings on large sites deliverable beyond 5 year period		944
	Sub Total	2,613
Less 10% slippage		261
	Sub Total	2,532
Plus sites under construction		359
<b>TOTAL</b>		<b>2,711</b>
<b>5.98 year supply (based on 250 dpa)</b>		

*Table 5.3: LPA's five year supply position based on 280 dpa*

Based on a requirement of 280 dpa using Sedgfield Method

A	Planned Provision 2008- 2028	5,600
B	Annual equivalent	280
C	Five Year Requirement (B x 5)	1,400
D	Plus 20% buffer (B + C)	1,680
E	Completions 1/4/2008 – 31/3/2014	735
F	Shortfall [(6 X B) – E]	945
G	Total Five Year Requirement (D + F)	2,625
H	Annual Requirement (G/5)	525

Identified Supply as of 31<sup>st</sup> March 2014

Sites subject to S106 Agreements	1,206	
Sites with planning permission	1,907	
Affordable Units not started	587	
	Sub Total	3,700
Less sites not deliverable	143	
Less dwellings on large sites deliverable beyond 5 year period	944	
	Sub Total	2,613
Less 10% slippage	261	
	Sub Total	2,532
Plus sites under construction	359	
<b>TOTAL</b>	<b>2,711</b>	
<b>5.16 years supply (based on 280 dpa)</b>		

- 5.22 Within the above table, the LPA accepts that a 20% buffer should be applied, in view of persistent under-delivery of housing. This is in accordance with paragraph 47 of the NPPF, and equates to an additional 250 dpa, 280 dpa and 300 dpa respectively.

- 5.23 RVBC do not currently include C2 uses in their housing land supply position, and nor should these be included in the supply as they are not included in the housing requirement figure, as they are not based on FOAN.

**Applicant's Five Year Housing Land Supply Position**

- 5.24 To calculate the housing land supply position in RVBC, we have undertaken an assessment of the Council's claimed supply in accordance with national planning policy, and the deliverability of sites and extant permissions identified in the Housing Land Availability Statement- April 2014.
- 5.25 The conclusions of this assessment are presented in Appendix 1.

**Assumptions and Methodology**

- 5.26 In undertaking our assessment, we have applied a number of assumptions and methodology as set out below, provided with the rationale behind each.

**Build Out Rates**

- 5.27 We have assumed conservative build-out rate of 30 dwellings per annum on those sites with a single housebuilder on board, and 50 dwellings per annum for those sites with two housebuilders on board. This aligns with guidance provided by the Regional Planning Manager for the Home Builders Federation in a letter dated 7th April 2008 (Appendix 2).

**Large Sites**

- 5.28 Due to the current market conditions in Ribble Valley, it is not considered by the Applicant that more than 2 housebuilders will be on site and therefore the above build out rates apply.

**Sites with Extant Planning Permission**

- 5.29 For those sites subject to extant planning permission, we have assumed that these are deliverable unless there is clear evidence to suggest that schemes will not be

implemented within five years. This aligns within the guidance contained in Paragraph 031: Reference ID: 3-031-20140306 of the PPG.

- 5.30 Such evidence includes whether a site has stalled, whether a site has outline or full Appellant Position on Five-Year Housing Land Supply planning permission (and hence making an allowance for the lead-in times associated with securing RM consent), whether there is a housebuilder(s) on board, and whether a site remains occupied and operational. Where planning permission has lapsed, and no renewal application has been submitted, these sites have been discounted from the supply.

Sites awaiting Section 106 Agreement

- 5.31 We have assumed that these sites are deliverable unless there is clear evidence to suggest otherwise.

Sites without Planning Permission

- 5.32 The PPG has introduced additional guidance on what constitutes a "deliverable" site in the context of housing policy (Paragraph: 031 Reference ID: 3-031-20140306). This states that:

**"Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe. The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five year housing supply."**

- 5.33 In view of the above, we have adopted the position that sites without planning permission can be included within the five year housing land supply, albeit only where this is justified by RVBC with robust and up to- date evidence.

- 5.34 However, the Council only seek to include sites with planning permission in their housing land supply.

Lead in Times

- 5.35 In terms of lead in times, RVBC assume that all sites within the Housing Land Availability Assessment will come forward within the five years. We disagree with this view, and have utilised this in our assessment enclosed in Appendix 1 on a case by case basis.

Student Accommodation and Use Class C2 Accommodation

- 5.36 We have included these use classes (where relevant) within the five-year housing land supply in accordance with the latest guidance contained in the PPG. However, as RVBC have not included this in their FOAN, this should not be included within the supply.

Slippage

- 5.37 The Council have anticipated and allowed for 10% slippage allowance within their five year supply calculations. Whilst we consider that this should be higher, due to the amount of schemes which have been significantly delayed to date, and been in the housing land supply for over 5 years. However, for consistency with the Council's table, we have kept this in accordance with the Council's position and five year housing land supply calculation.

Historic Permissions

- 5.38 There are a number of historic permissions which have been implemented or to date remain unimplemented.
- 5.39 Those sites which planning permission has been implemented but the remaining development in over 7 years (since 2008) have been excluded from the supply.
- 5.40 Sites which permissions have not been implemented since 2008 have been excluded from the supply.

- 5.41 Permissions which the planning permission has expired have also been discounted from the supply.

#### **Five Year Supply Assessment**

- 5.42 On the basis of the above we have assessed the latest Housing Land Availability Assessment (April 2014) and the site assessment is provided in Appendix 1.
- 5.43 It is our view that a minimum of 280 dpa is required, in line with the Inspector's findings at EIP which confirmed a minimum of 280 dpa rather than a "target" of 280 dpa, and a more realistic housing target to meet the full objectively assessed needs of the Borough is 300 dpa.
- 5.44 We have assessed the five year supply position on this basis.
- 5.45 Barton Willmore's assessment of supply has demonstrated provision for the delivery of 2,178 dwellings.
- 5.46 Taking account of the annual housing requirement of 280 dwellings per annum, this equates to a 4.14 year supply, inclusive of an allowance for a 20% buffer, and housing under- delivery.
- 5.47 Based on the adjusted figure of 2,178 dwellings, RVBC are only able to demonstrate at best a **4.14 year supply** (based on 280 dpa).

Table 5.4: Applicant's Five year supply position based on 280 dpa

Barton Willmore Identified Supply as of 31<sup>st</sup> March 2014 (requirement of 280 dpa)

	LPA Figure	LPA Revised Figure	BW Figure
Sites subject to S106 Agreements*	1,206	166	166
Sites with planning permission	1,907	2,947	2,392
Affordable Units not started**	587	587	587
Sub Total	3,700	3,700	3,145
Less sites not deliverable	143	143	143
Less dwellings on large sites deliverable beyond 5 year period	944	944	944
Sub Total	2,613	2,613	2,058
Less 10% slippage	261	261	205
Sub Total	2,532	2,532	1,853
Plus sites under construction***	359	359	325
<b>TOTAL</b>	<b>2,711</b>	<b>2,711</b>	<b>2,178</b>
<b>4.14 years supply (based on 280 dpa)</b>			

\*Standen and Barrow included in s.106 and sites with planning permission

\*\*Accounted for in sites with planning permission

\*\*\* Croft Way, Pasture Grove and Meadow Lane, Longridge and Brown Leaves and Water Meadows (34 units)

### Conclusions

- 5.48 RVBC are therefore unable to demonstrate a five year supply of deliverable housing sites as required by paragraph 47 of the NPPF.
- 5.49 In the absence of a five-year housing land supply, the provisions of paragraphs 49 and 14 of the NPPF are engaged.
- 5.50 The proposed development of the Site should therefore be granted permission in the context of the presumption in favour of sustainable development set out under

paragraph 14 of the NPPF, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or specific policies contained in the NPPF indicate that development should be restricted.

## 6. COMPLIANCE OF THE PROPOSED DEVELOPMENT WITH NATIONAL PLANNING POLICY

### Introduction

- 6.1 This Statement has established the decision making context for the development proposal, whereby planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.
- 6.2 This section assesses the relevant policies that arise in assessing the impact of the proposed development, and applying the relevant policies of the NPPF.

### Accordance with the NPPF

#### Sustainable Development

- 6.3 The NPPF states that there are three dimensions to the presumption in favour of sustainable development: 1) economic; 2) social and 3) environmental, which give rise to the need for the planning system to perform a role under each<sup>29</sup>
- 6.4 We consider the proposed outline scheme delivers all three dimensions of sustainable development as set out below:

*Table 6.1- NPPF Assessment*

Dimension	Benefits of the Proposed Development
Economic	<ul style="list-style-type: none"> <li>• The development will have significant economic benefits for Longridge and Ribble Valley.</li> <li>• The economic benefits of house building are set out in the Government's 2012 Housing Strategy Laying the Foundations. It is estimated that housing development accounts for 25-30% of jobs in the construction sector.</li> <li>• The proposal will support 143 full time construction jobs over the construction period. The construction process will also</li> </ul>

<sup>29</sup> Paragraph 7, NPPF

Dimension	Benefits of the Proposed Development
	<p>potentially provide supply chain opportunities for local businesses in Longridge and the wider Borough and generate £5.2m per annum through the construction workers, and over a 10 year period £52m.</p> <ul style="list-style-type: none"> <li>• When the dwellings are occupied this will result in increased annual household spending of £10.7m for the local economy of Longridge and the surrounding area.</li> <li>• The provision of 1 primary school would generate around 18 jobs..</li> <li>• Increase population in the area.</li> <li>• New Homes Bonus of over £3.4m</li> <li>• The development will be of economic benefit to the local authority through the provision of new homes bonus payments to the Council.</li> <li>• Provide opportunities for apprenticeships and training opportunities during construction for residents in the local area.</li> <li>• Enhance the vitality and viability of Longridge and the wider Ribble Valley area.</li> </ul>
Social	<ul style="list-style-type: none"> <li>• The development will result in significant social benefits by providing a supply of housing required to meet the <b>"needs of present and future generations"</b> and meet the identified needs of the area in accordance with the NPPF</li> <li>• The development will help to deliver a wide choice of homes and widen opportunities for home ownership in line with the NPPF</li> <li>• Provision of 30% affordable homes pepper potted throughout the development to meet an acknowledged local shortage, both in Longridge and the wider Ribble Valley Borough.</li> <li>• The development will provide aspirational housing for families in a high quality built environment with excellent links to Longridge Town Centre and its many facilities.</li> <li>• Increase in local population generating economic benefits</li> <li>• The development proposals include significant areas of accessible public open space (10.99 ha) to the north of the</li> </ul>

Dimension	Benefits of the Proposed Development
	<p>developed area, providing opportunities for healthy living and access to the rural fringe of the settlement. The proposal also includes provision for a local play space for young children, providing opportunities for safe, outdoor physical and social interaction for children and families through both a LEAP and NEAP.</p> <ul style="list-style-type: none"> <li>• Enhancement of local primary education facilities through the provision of a new primary school.</li> <li>• Relocation and upgrading of existing Cricket club which will enhance the existing facilities.</li> <li>• Creation of pedestrian and cycle linkages to and within the Site.</li> </ul>
Environmental	<ul style="list-style-type: none"> <li>• Whilst the proposed development will result in the loss of previously undeveloped, Greenfield agricultural land, it is species poor, semi-improved grassland of negligible ecological value and lower grade agricultural quality. Consequently, the best and most versatile agricultural land and land of the highest ecological value is preserved.</li> <li>• The proposal will not damage the environment. Detailed consideration has been given to the proposal to ensure that any impact on the environment and ecology is mitigated. The development will result in significant improvements to biodiversity and the ecological value of the remaining land; particularly to the north of the site, which is being retained for part recreation and part ecological enhancement measures.</li> <li>• Enhancement measures include new species rich hedgerow planting, the improvement and management of retained hedges, the improvement to the wildlife value of ditches through management, a Landscape Strategy that propose additional wildlife ponds, the creation of rough margins to fields, the establishment of low density grazing regimes to improve floral diversity, and the establishment of new bird and bat boxes at appropriate locations.</li> <li>• A Sustainable Urban Drainage System ("SUDS") will be</li> </ul>

Dimension	Benefits of the Proposed Development
	<p>incorporated within the Site's green infrastructure</p> <ul style="list-style-type: none"> <li>• The proposal has been designed to ensure it does not increase the flood risk, either on site or elsewhere and will not impact on any historic or archaeological features.</li> <li>• The Site is not in the Green Belt, or any other designations referred to in footnote 9 of the NPPF such as AONB,</li> <li>• The Site benefits from good transport linkages to the local highway network, public transport services and pedestrian and cycle provision to Longridge Town Centre and beyond via existing routes and a proposed new pedestrian access to the south of the Site.</li> <li>• It scores highly in terms of accessibility according to the Lancashire County Council residential development accessibility questionnaire.</li> <li>• Located in close proximity to a number of facilities and amenities, limiting the need to travel by private car and providing choice.</li> <li>• The accompanying residential travel plan sets out measures with the primary target of reducing single occupancy car journeys, which will reduce the impact of the development upon the environment and encourage walking, cycling, use of public transport and car sharing measures.</li> <li>• The development will be constructed to achieve high efficiency ratings resulting in CO2 emission reductions in accordance with Part L of the Building Regulations, in order to mitigate climate change and movement towards a low carbon economy.</li> <li>• Building for Life standards will be applied across the development.</li> <li>• Scheme has been sensitively designed and is in keeping with the local character of Longridge.</li> </ul>

6.5 It is therefore my view that the proposed development constitutes as a sustainable development, and any adverse impacts of the proposal are outweighed by its benefits and the proposal is compliant with the overarching objectives of the NPPF.

- 6.6 In addition to the above, RVBC has assessed part of the Site within the 2013 SHLAA Update. It is covered by two SHLAA sites- Reference 035 "Corner of Chipping Lane and Inglewhite Road, Longridge" and Reference 385 "Land North West of Junction of Chipping Lane, Inglew". Both SHLAA sites are considered to be deliverable and included in the five year supply.
- 6.7 Site 385 refers to the site which is subject to this application, with the exception of the Cricket Club, which is not included within the SHLAA site boundary, but forms part of the application boundary. Site 035 refers to the south western field parcel only.
- 6.8 The SHLAA identifies the Site (under Site 385) which is subject to this application, as suitable, available (within 0-5 years), achievable and deliverable and is considered by the Council in their assessment that "there is a reasonable prospect that housing will be developed on the site". The Site has also been assessed as scoring 98 out of a possible 110 and no other SHLAA site in Longridge scored higher in terms of sustainability, and supports the Applicant's consideration that the Site is sustainable.
- 6.9 For the above reasons, it is clear that the proposed development is sustainable, and will contribute to sustainable development through economic, social and environmental means, and the benefits outweigh any disbenefits of the scheme in sustainable terms, and weigh significantly in favour of the application.

Delivering a wide choice of high quality homes

- 6.10 The NPPF sets out the requirement to:
- "deliver a wide choice of high quality homes, wider opportunities for home ownership and create sustainable, inclusive and mixed communities"**
- 6.11 The proposed development will significantly assist in boosting significantly the supply of housing within Longridge and the Ribble Valley. The proposed development represents a genuinely deliverable, well conceived development that seeks to deliver a high quality design incorporating a mix of house types, styles and tenure to meet identified needs. In circumstances such as that of Ribble Valley, where there is

currently a failure to demonstrate a 5-year supply of deliverable housing sites, the proposed development will deliver significant benefits.

- 6.12 The development will deliver 30% affordable dwellings which is a significant benefit that weighs in favour of the proposed development.
- 6.13 The most recent Strategic Housing Market Assessment 2013 ("SHMA") identifies that 918 households are considered to be unsuitable housing, and of these 594 are considered to be in need on the basis that they could not afford market housing. This is a significant level of unmet need and translates, as set out in the SHMA into a net annual requirement of 404 affordable dwellings.
- 6.14 The emerging Local Plan does not propose to meet this need in full, or even half this need, which places an even greater importance on the delivery of affordable housing through market housing schemes such as this.
- 6.15 Whilst the SHMA does not identify a need for Longridge specifically, the Longridge Housing Need Report 2013 sets out the local needs. The Report states that of those who responded to the Housing Needs Survey 33% had someone in their household who was in housing need. Whilst, there was a relatively low response rate to the survey, it still equates to 148 respondents in housing need. A worrying statistic contained within the Report is the fact that in the last 10 years there have been less than 10 affordable dwellings built in Longridge. Without further development, such as that proposed by the Applicant, the problems of need will only be exacerbated. The delivery of 30% affordable dwellings through this scheme is therefore a significant benefit to weigh in its favour.

#### Conserving and Enhancing the Natural Environment

- 6.16 Section 11 of the NPPF sets out the Government's policy in relation to the contribution and enhancement of the natural and local environment.

#### Ecology

- 6.17 An Ecological Assessment Report has been prepared by Tyler Grange in respect of the Outline application and concludes that the proposals are not likely to result in any adverse impacts to statutory or non-statutory nature conservation designations.

- 6.18 Whilst it is accepted that some loss of habitat is inevitable it will be largely confined to poor semi-improved grassland of negligible ecological value. Species rich hedges, trees and ponds will largely be retained with green infrastructure and buffers to avoid degradation. This green infrastructure runs through the developed area of the Site and to the north in the area of open space.
- 6.19 The protected species survey have determined that whilst there are ponds present within 250m of the Site, it does not support Great Crested Newts but do support common frogs, hedges are likely to provide habitat for nesting birds, and other species such as hedgehogs may be present. It is also considered that any impact on bats or breeding birds can be accommodated within the proposed development, and these will be informed where necessary by further surveys or through planning conditions. However, it is considered that that the species can be accommodated through appropriate implementation of mitigation.
- 6.20 It is therefore considered that the overall impact is not considered to be adverse, and new green infrastructure and ecological enhancement measures are proposed and the site can be developed in conformity with relevant planning policy which seeks to protect and enhance ecological resources.

#### Landscape

- 6.21 A Landscape and Visual Impact Assessment, prepared by Tyler Grange, accompanies the planning application. Overall it concludes that the character effects are localised and the visual effects are limited and will be addressed by the landscape strategy response and Illustrative Masterplan.
- 6.22 The Site is not covered by any specific Development Plan landscape designation, but is located approximately 1.1km away from the Forest of Bowland AONB. The LVIA concludes that there will be no perceptible impact upon the AONB, Longridge Fell or the Longridge Conservation Area.
- 6.23 The majority of the relevant landscape policy objectives and landscape character area objectives are satisfied completely or in-part through an appropriate development response that responds to the site specific criteria and established landscape strategy. There will be some tree and hedgerow loss along Chipping Lane to facilitate vehicle access, which may result in a localised impact. However, the

landscape strategy response and Masterplan proposes to mitigate this through compensatory planting more than what is being removed.

#### Loss of Agricultural Land

- 6.24 The accompanying Agricultural Land Quality Report, prepared by Fisher German concludes that the Site falls under the category of Grade 3B in the agricultural land classification. The NPPF seeks to protect the best and most versatile agricultural land, commonly referred to as Grade 1, 2 and 3A, from significant development and requires local planning authorities to consider the economic and other benefits of such land<sup>30</sup>. The Site does not fall under this category; consequently there is no justification for the protection of the Site from development.

#### Noise

- 6.25 A Noise Assessment, prepared by WSP accompanies the planning application, which considers the various elements of the proposal including the school and Cricket Club and concludes that the proposed attenuation by mitigation measures are sufficient to ensure the daytime noise limits are met in the gardens of the dwellings closest to the road network, supermarket, relocated Cricket Club and primary school. It considers that appropriate ambient noise levels can be achieved subject to appropriate mitigation. It is therefore determined that acceptable noise levels will be achieved.

#### Flood Risk

- 6.26 The application is accompanied by a Flood Risk Assessment and Drainage Appraisal prepared by RSK. It confirms that the Site is located wholly within Flood Zone 1, confirming that the Site is not at risk of flooding from fluvial and/or tidal sources and the Sequential Test has been met<sup>31</sup>. It confirms further that flooding from fluvial sources can be considered low following the implementation of a suitable surface water drainage scheme. Overall, flood risk to the proposed development from all other sources is considered to be low and there are no reasons that the development of the site should be precluded on flood risk grounds.

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<sup>30</sup> Paragraph 111, NPPF

<sup>31</sup> Paragraph 100-103, NPPF

- 6.27 Any increase in surface water run-off from the proposed development will be attenuated on-Site and discharged at pre-development rates to on-Site watercourses, subject to approval from the relevant authorities. A number of recommendations and options are also available to manage post development drainage and the disposal of surface water via sustainable urban drainage systems ("SUDS").
- 6.28 Details of the Drainage Appraisal proposals are contained in Appendix E of the report.
- 6.29 The proposed development is therefore considered to be acceptable in flood risk terms with no resultant adverse impacts weighing against the presumption in favour of sustainable development.

#### Promoting Sustainable Transport

- 6.30 The application is accompanied by a Transport Statement ("TA") and a Travel Plan ("TP") prepared by Vectos.
- 6.31 The TA concludes that the Site is accessible by sustainable modes of travel given its proximity to Longridge town centre. It highlights that there is an established network of footways located within the vicinity of the site providing links to the surrounding retail, employment, educational and residential areas, and this in turn results in the sustainable credential of the site being strengthened with the provision of the primary school on site as it will reduce the need to travel to/from the Site during the highway networks peak hour periods.
- 6.32 Furthermore, there is a bus route located within 400 metres of the site with further services provided with Longridge town centre, which enhances the Site's accessibility.
- 6.33 The TA concludes that proposed development will not have a material impact to the operation to the majority of the existing highway network in and around Longridge, and where a reduce level of service is offered, it is considered that the level of impact is not severe, in line with the NPPF<sup>32</sup> in relation to traffic impact.

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<sup>32</sup> Paragraph 32, NPPF

- 6.34 A TP has also been prepared as part of the application and sets out a range of measures which can be adopted to maximise opportunities for the use of sustainable transport modes. These measures include: Travel Plan promotion and a Welcome Pack to local residents providing details of local walking and cycling routes, and made aware of the cycle to work scheme, alongside local bus timetables and maps. Details of car sharing schemes and financial contributions to Lancaster County Council such as contributions to bus passes and bicycle contributions are also detailed within the TP, and as part of the development scheme, it is proposed that the existing bus stops along Chipping Lane, will be upgraded and connectivity enhanced.
- 6.35 Additional traffic is a consequence of development, but the proposed scale of development will not result in a harmful material impact on the existing highway. The TA and TP demonstrate that the development is well connected to the Town Centre and surrounding sustainable travel options, including public transport, walking and cycling. A range of measures are detailed within the Travel Plan which seek to encourage and facilitate opportunities for the use of sustainable transport modes and it is considered that the proposed development is in accordance with the Policies of the NPPF<sup>33</sup>.

#### Air Quality

- 6.36 An Air Quality Assessment has been prepared by RSK and concludes that the proposals comply with national (and local) planning policy and the overall impacts will be negligible. This is on the basis that the effects range from slight adverse to negligible to neutral for the Site. It is therefore considered that the proposed development is in accordance with the Policies of the NPPF.

#### Trees

- 6.37 A Tree Survey has been prepared by Tyler Grange and concludes that whilst there will be some loss of hedgerows this will be compensated by providing new species-rich hedgerow planting within the site, totalling approximately 1,264m. This will augment retained habitats and enhance connectivity between similar habitats. Native tree planting is also proposed, with over 200 new trees proposed. Any potential tree

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<sup>33</sup> Paragraphs 29-41, NPPF

loss and associated mitigation/compensation measures have also been considered as part of the accompanying Ecological Assessment, and it is therefore considered to be compliant with the NPPF.

#### Requiring Good Design

- 6.38 The NPPF sets out the importance of good design, and considers it to be a key aspect of sustainable development, which should contribute positively towards creating better places for people to live<sup>34</sup>.
- 6.39 A Design and Access Statement ("DAS") has been prepared by E\*scape and explains the overall approach to the design of the Site, how it has evolved, and the linkages between the application for 106 dwellings which is pending consideration, and the outline application. The parameters and rationale for the Masterplan are also explained within the DAS and it sets out that how the homes and the Primary School will become part of the surrounding environment. Both new and existing residents will have access to the leisure and education uses through the new primary school and Cricket Club and will create a contextually responsive edge to the Site, and will become a positive asset to the settlement in terms of the design, layout and open space.
- 6.40 The DAS provides a detailed presentation of the design rationale, which is not replicated in the Planning Statement and sets out the justification and support for the proposal and that it satisfies the policies within the NPPF and the presumption in favour of sustainable development.

#### **Conclusions**

- 6.41 We have reviewed the proposal in the context of the NPPF, and have demonstrated that when considered alongside the detailed content within the accompanying suite of documents, that the proposed development represents sustainable development in accordance with the NPPF. As stipulated in Table 6.1, there are a number of economic, social and environmental benefits that weigh significantly in favour of the proposed development.

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<sup>34</sup> Paragraph 56, NPPF

- 6.42 There are no adverse impacts identified that would be regarded as “significantly and demonstrably” outweighing the significant and numerous benefits of the proposal.
- 6.43 In applying the presumption in favour of sustainable development, as defined by the NPPF, planning permission should be granted for the proposals.

## 7. ACCORDANCE WITH THE DEVELOPMENT PLAN

### Introduction

- 7.1 Within this section, we will consider how much weight can be attached to the policies of the Local Plan, in the absence of a five year housing land supply, and the fact that the Local Plan was prepared under the auspices of the 1990 Act rather than the 2004 Act. This Statement has already concluded that in applying the presumption in favour of development, the NPPF takes precedence and compliance with the policies of the NPPF has been demonstrated. Compliance with adopted Local Plan policies is summarised below.

### Compliance with the Policies of the Local Plan

- 7.2 We have set out the relevant policies of the Local Plan in Section 4 of the Statement (Table 4.1), and Table 7.1 below summarises how the proposal complies with these policies.

*Table 7.1: Assessment of the Proposals Against Local Plan Policies*

Policy	Response
Policy G1 Development Control	The accompanying suite of application documents and drawings and the various comments elsewhere within this Statement demonstrate that the proposed development will achieve a high standard of building design and landscape quality, and that the scale and intensity of the development is appropriate; the impact of traffic generation has been demonstrated to be acceptable and an appropriate level of car parking will be provided; the proposals will deliver significant areas of publicly accessible open space and extensive ecological enhancement measures will be delivered. The proposal is therefore considered to be in accordance with policy G1.
Policy G2 Wilpshire,	Policy G2 is considered to be out of date because it restricts the scale and location of housing development in a situation

Policy	Response
Clitheroe, Billington, Longridge and Whalley	where RVBC cannot demonstrate a 5-year supply of housing land. This policy is therefore afforded no weight.
Policy G5 Outside the main settlements	As with policy G2, policy G5 is strategic in nature and determines the extent of development permitted outside existing, now dated, development boundaries, which will need to change in the emerging Local Plan in order to accommodate future development. The policy is therefore out of date in this respect. The policy is also out of date by virtue of the fact that RVBC cannot demonstrate a 5-years supply of housing land. This policy is therefore afforded no weight.
Policy G11 Crime Prevention	The accompanying DAS highlights measures employed in the design of the development to create a safe and accessible environment. The proposed development is considered to comply with this policy.
Policy ENV3 Open Countryside	The accompanying LVIA demonstrates how the landscape character of the surrounding open countryside has been taken into account in determining the development boundaries of the proposal, the approach to the design of the development and in assessing impact. On the basis of the conclusions of the LVIA, the proposed development is considered to be in accordance with policy ENV3.
Policy ENV6 Agricultural Land	This policy is not in accordance with the approach of paragraph 112 of the NPPF; it is therefore afforded no weight. Also as the land is Grade 3B there is no justification for the protection of this land.
Policy ENV7 Species Protection	Detailed consideration has been given to the proposal to ensure that any impact is mitigated and the accompanying ecological assessment report concludes that the development proposals are not likely to result in any adverse impacts to statutory or non-statutory nature conservation designations.

Policy	Response
	<p>There are no GCN on site, and it is concluded that any impact on bats or breeding birds can be accommodated and the overall impact is not considered to be adverse. Furthermore, the proposed ecological enhancement measures will provide benefits in the form of improved habitat for protected species. The proposed development is therefore in accordance with policy ENV7.</p>
<p>Policy ENV10 Nature Conservation</p>	<p>The nature conservation of the Site is not considered to be of notable value. The proposed development will result in the delivery of managed nature conservation benefits, through the creation of the proposed green infrastructure and extensive ecological enhancement measures. The proposed development is therefore in accordance with policy ENV10.</p>
<p>Policy ENV13 Landscape Protection</p>	<p>The LVIA concludes that the landscape character effects of the proposed development are localised and the landscape character area objectives are satisfied either completely or in part through the site specific landscape strategy. It also concludes that there will be no perceptible impact on the AONB, Longridge Fell and Longridge Conservation Area. The proposed development is therefore in accordance with the policy ENV13.</p>
<p>Policy ENV16 Conservation Development Control</p>	<p>The LVIA concludes that the proposed development is sufficiently detached from the setting of Longridge Conservation Area to avoid any impact upon its character or appearance. Similarly, the proposed development does not impact upon the setting of any listed buildings. The proposed development is therefore in accordance with policy ENV16.</p>
<p>Policy H2 Dwellings in the Open Countryside</p>	<p>Policy H2 is for the most part out of date because it relates to the impact of the supply of housing in the open countryside when RVBC cannot demonstrate a 5-year supply of housing land. In addition, settlement boundaries will need to be revised to include existing areas of open countryside through</p>

Policy	Response
	<p>the emerging Local Plan process to accommodate future housing growth; as set out in the Inspector's comments at EiP, however, the extent and location of this is yet to be determined. The impact of the proposals upon the open countryside in a more general sense is covered in other policy considerations.</p>
<p>Policy H19 Housing Needs: Large sites in Main Settlements</p>	<p>30% of the proposed dwellings will be affordable. This is a significant benefit to the local area and provides compliance with policy H19.</p>
<p>Policy RT8 Open Space Provision</p>	<p>The proposed development will deliver significant public open space, which also support ecological enhancement measures, in addition to the green infrastructure within the developed area of the Site, and the cricket club provision. Over 10.99 ha of green space will be provided, and a further 3.5 ha for the Cricket Club. A LEAP and a NEAP will also be provided on site. The proposed development is therefore significantly over-providing in public open spaces and is compliant with RT8.</p>
<p>Policy T1 Transport and Mobility</p>	<p>The proposed development is located within 400m of an existing bus route, on Chipping Lane, with access to further bus services in Longridge Town Centre, which is accessible on foot and by cycle. This accessibility is enhanced through the provision of an improved footway on Chipping Lane and new pedestrian link from the development to Sainsbury's to the south east.</p>
<p>Policy T7 Parking Provision</p>	<p>The internal layout is designed to accommodate the movements of delivery and refuse vehicles, as well as emergency vehicles. The proposed arrangements for parking and servicing are therefore considered to be in accordance with policy T7, and will be dealt with at RM stage.</p>

**Other Policy Considerations**

**Compliance with Policies of the Emerging Local Plan**

7.3 Section 4.0, sets out potentially relevant policies of the emerging Core Strategy ("CS"), which includes development management policies. It is concluded above that CS policies are not yet sufficiently advanced to carry significant weight in the determination of these development proposals. However, for completeness, we set out in Table 7.2 below the demonstration of compliance with the CS.

*Table 7.2: Assessment of the Proposal Against Emerging Core Strategy Policies*

Policy	Response
<b>Key Statements</b>	
Key Statement DS1: Development Strategy	Longridge is identified as a principal settlement and the majority of new housing development will take place in and around those settlements over the Plan period. The proposed development is therefore consistent with the development strategy of the CS, which is to concentrate higher levels of growth in the most sustainable locations.
Key Statement DS2 Presumption in favour of sustainable development	These development proposals constitute sustainable development with significant benefits that are not outweighed by other considerations. This is set out in Table 6.1. In applying the presumption in favour of sustainable development, the proposed development is in accordance with policy DS2.
Key Statement EN2 Landscape	For reasons highlighted above, in relation to landscape impact and the conclusions of the LVIA, the proposed development is considered to be in accordance with policy EN2.
Key Statement EN3 Sustainable Development and Climate Change	The fact that the proposed development is sustainably located, with good access to public transport and links by walking and cycling to Longridge town centre, in addition to the Travel Plan measures proposed, means that the need to travel by car is reduced and thus CO <sub>2</sub> emissions. The proposed development will be constructed to meet Building

Policy	Response
	<p>Regulations requirements, with a fabric first approach to securing CO<sub>2</sub> reductions for the lifetime of the development. The proposed development will include dwellings built to Lifetime Homes standards. The accompanying Air Quality Report clearly sets out that the proposed development will have a negligible overall impact. The proposed development is in accordance with policy EN3.</p>
<p>Key Statement EN4 Biodiversity and Geodiversity</p>	<p>Highlighted elsewhere within this Statement and demonstrated in the accompanying Ecological Assessment Report, is the conclusion that the proposed development will not result in significant harm to ecological interests and will deliver net beneficial ecological enhancement measures. The proposed development is therefore in accordance with policy EN4.</p>
<p>Key Statement H1 Housing Provision</p>	<p>This policy is the subject of significant objection. Notwithstanding this, the provision of up to 520 dwellings in the Principal Settlement of Longridge will contribute to the delivery of the Borough's housing needs in a sustainable manner, when RVBC cannot demonstrate a 5-year supply of housing land and further growth will be directed to Longridge.</p>
<p>Key Statement H2 Housing Balance</p>	<p>The proposals take full account of the SHMA and Longridge Housing Needs Survey, as well as market signals, in order to provide a suitable mix of housing on-site, through the provision of 3, 4 and 5 bed properties, alongside smaller two bed properties in accordance with policy H2.</p>
<p>Key Statement H3 Affordable Housing</p>	<p>The proposed development will deliver the required 30% affordable housing in accordance with policy H3.</p>
<p>Key Statement DMI1 Planning Obligations</p>	<p>This matter will be the subject of discussion during the planning application process. The principle of planning obligations is supported by the Applicant, through the inclusion of the primary school and Cricket Club in the proposals.</p>

Policy	Response
<p>Key Statement DMI2</p> <p>Transport Considerations</p>	<p>The proposed development is in a sustainable location, with excellent links to Longridge town centre as proposed, and the many shops and services that it offers, as well as having good access to public transport, in the form of bus services on Chipping Lane and in the town centre. Measures to encourage the use of public transport, walking and cycling are included within the accompanying Travel Plan.</p>
<b>Development Management Policies</b>	
<p>Policy DMG1</p> <p>General Considerations</p>	<p>Policy DMG1 sets out a wide range of development control requirements, including in relation to design, traffic and parking implications, residential amenity, biodiversity and protected species, open space protection and sustainable construction. For the reasons set out within this Statement the proposed development is considered to be in accordance policy DMG1.</p>
<p>Policy DMG2</p> <p>Strategic Considerations</p>	<p>The location of the Site, on the edge of the principal settlement of Longridge, is in accordance with the strategic policies of the CS. The settlement boundaries of Longridge will need to be redrawn to take account of Greenfield land release which is necessary to meet development needs.</p>
<p>Policy DMG3</p> <p>Transport and Mobility</p>	<p>The availability of public transport and associated infrastructure; relationship to the existing road network; and provision of access for pedestrians, cyclists and those with reduced mobility to Longridge town centre, detailed within this Statement and the accompanying documents demonstrates compliance of the proposed development with policy DMG3.</p>
<p>Policy DWM2</p> <p>Landscape and Townscape Protection</p>	<p>As already highlighted elsewhere in this Statement and within the accompanying LVIA, the proposed development is not considered to have a significant detrimental impact upon the character and qualities of the landscape.</p>

Policy	Response
Policy DME3 Site and Species Protection and Conservation	The proposed development will not impact adversely upon protected species or any features of nature conservation value. Furthermore, the proposed development provides significant measures for the enhancement of biodiversity. The proposed development is therefore in accordance with the requirements of policy DM3.
Policy DME5 Renewable Energy	Policy DME5 is contrary to national planning policy by setting local renewable energy standards for development proposals.
Policy DMH1 Affordable Housing Criteria	30% of the proposed dwellings will be affordable, in accordance with the policy. The provision of accommodation for the elderly will be the subject of discussion with RVBC during the planning application process.
Policy DMH3 Dwellings in the open countryside and AONB	Whilst the Site is presently within the open countryside, the emerging Local Plan has not yet advanced to the stage where settlement boundaries have been drawn in a way that will ensure delivery of Longridge's development needs for the Plan period. This process will inevitably lead to the expansion of Longridge, and other settlements, into the open countryside, to help meet the requirements of the Borough.
Policy DMB4 Open Space Provision	The built area of the Site includes public open space, as well as a children's play area in the form of a LEAP and a NEAP, and land to the north of the developed area. This public open space provision is extensive (10.99 ha of green space provision) and complies with the requirements of policy DMB4. In light of the significant over-provision of public open space within the development, and the onsite provision of the LEAP and NEAP, any contributions towards sport and recreation facilities will be discussed as part of the planning application.

7.4 The CS is yet to have completed the formal process of Examination and forms only part of the emerging Local Plan for Ribble Valley, which will not be complete in its

preparation until both the CS and Allocations document are found sound and then adopted. However, the above assessment demonstrates that the proposed development does comply with the strategic policies of the CS, in terms of the location of the proposed development.

## 8. AFFORDABLE HOUSING STATEMENT

- 8.1 In line with existing and emerging Development Plan policies the Applicant is committed to delivering affordable housing as part of the development. In this respect 30% of the proposed dwellings will be affordable.
- 8.2 Within this statement it is established that, according to the Ribble Valley Strategic Housing Market Assessment 2013 (SHMA), there are 918 households in unsuitable housing in the Borough, 594 of which were considered to be in need on the basis that they could not afford market housing. This is a significant level of unmet need and translates, into a net annual requirement of 404 affordable dwellings. Importantly, the emerging Local Plan does not propose to meet this need in full, or even half this need, which places an even greater importance on the delivery of affordable housing through market housing schemes such as this.
- 8.3 The Longridge Housing Need Report 2013 helps to provide a picture of needs locally. The Report states that 33% of those who responded to the survey had someone in their household who was in housing need. Whilst there was a relatively low response rate to the survey, it still equates to 148 respondents in housing need. The Report also highlights, however, that there are over 400 people on the social housing waiting list in Longridge, which suggests that affordable housing need in Longridge is greater than the survey indicates. This is exacerbated by the worrying statistic that in the last decade there has been less than 10 affordable dwellings built in Longridge. Without further development, such as that proposed by the Applicant, the problems of need will only be exacerbated. The proposal to deliver 40% affordable dwellings through this scheme is therefore a significant benefit to weigh in its favour.
- 8.4 The Applicant seeks further guidance from RVBC during the planning application process of the desired tenure split of the affordable housing proposed, which has not been expressed at pre-application stage. The Applicant will therefore negotiate positively with RVBC in this regard.
- 8.5 The affordable units will be distributed throughout the Site in order to encourage community integration and, in accordance with Development Plan and national policy guidance, the affordable units will not be discernible, in quality and appearance, from the market housing on Site.