

SOUTH RIBBLE EXAMINATION

**SITE ALLOCATIONS & MANAGEMENT POLICIES
DEVELOPMENT PLAN DOCUMENT**

Representation by Mr David Roocroft

5 Poplar Avenue, Longton, Preston, PR4 5PA

Representor Reference 10

Representation ID: 13

Matter 3

Day Two, Wednesday 6th March 2013

1. This representation relates to a site of approximately 0.95 hectares of unused vacant land located to the south of Chapel Lane, west of Chapel Park Road, Longton and as identified on the attached plan DR1 as site ID13.
2. The site is currently designated in the Publication version of the *Site Allocations and Development Management Policies* DPD as forming the eastern part of a wider area of *Protected Open Land* south of Chapel Lane, under Policy G4. It is located immediately south of existing residential development to the north which fronts Chapel Lane and is adjacent to Site Q to the east which is allocated under the DPD Policy D1 *Allocation of Housing Land* as a 1.1 hectare housing site with an estimated capacity of 10 dwellings.
3. As previously confirmed and for reasons addressed below it is considered that the DPD is unsound & not justified and it is accordingly requested that the subject site be allocated for residential development as a small extension to Site Q.
4. This statement addresses the Inspector's most recent *Matters Issues and Questions* relating to questions 2 and 3 of Matter 3 *Housing – Chapter D*.

General – Policies D1 & D2.

Inspector's Question 2:-

- *"Is sufficient land allocated to meet the objectively assessed needs over the plan period?"*
- *Is the approach consistent with the CS?*
- *Is there a need to identify additional land for housing?"*

5. “Is sufficient land allocated to meet the objectively assessed needs over the plan period?”

Whilst I am not in a position to provide a qualified view on this particular matter, I have nevertheless noted from representations to the DPD that there is a general contention on behalf of a number of developers and other parties that, for various reasons, insufficient land has been allocated under DPD Policy D1 to adequately meet the housing needs for the South Ribble district over the plan period, as required by Policy 4 of the Central Lancashire Core Strategy.

I also note that this matter is to be specifically addressed at the examination session dealing with the General Housing Discussion on the morning of day 2. If the Inspector eventually concludes that more housing sites should be allocated in South Ribble district then, for reasons addressed later in this statement, it is considered that Longton and the subject site are very well placed to accommodate an appropriate degree of further housing.

6. “Is the approach consistent with the CS?”

Notwithstanding the Inspector’s eventual conclusions on the above matter, I note that in any event, CS Policy 1: *Locating Growth* sets out a hierarchical approach to the promotion of growth and investment in the various settlements throughout Central Lancashire. Longton is identified under Policy 1(e) as one of three *Rural Local Service Centres* where limited growth

and investment will be encouraged to help meet local housing and employment needs and to support the provision of services to the wider area. CS Policy 1(f) essentially states that development at all other settlements and villages, not listed under CS Policy 1(a) – (e), is to be limited to more small scale developments etc. and which would accordingly apply to smaller villages in South Ribble such as Hutton and Walmer Bridge.

I note however that in seeking to meet the overall CS housing requirement, DPD Policy D1 allocates housing sites at Hutton (site N – 45 dwellings) and Walmer Bridge (site Y – 69 dwellings) which total 5.9 hectares with an estimated capacity of 114 dwellings. Whilst it is appropriate that the unidentified smaller settlements in the district, covered by CS Policy 1(f), should indeed have a degree of small scale housing allocations for the reasons set out in the policy, I must question whether the extent of the proposed allocations at sites N & Y are in compliance with CS Policy 1(f). I am aware that site Y has recently been granted planning permission and that as such it is no longer a matter for consideration at this examination. However I would contend that the extent of the allocation for site N at Hutton, which I understand is in the ownership of Lancashire County Council, should be reduced in order to more readily accord with the provisions of CS Policy 1(f). I note in this respect that Hutton Parish Council have objected to the allocation of site N and that the matter is to be addressed at other sessions of the Examination.

If the Inspector were to conclude that the extent of the allocation of site N was unsound then it would be appropriate for any reduction in the number of dwellings allocated at Hutton to be accommodated in whole or in part at Longton as this would more readily accord with the provisions of CS Policy 1(e).

7. *“Is there a need to identify additional land for housing?”*

In light of the above, I consider that there is a need to identify some additional and / or re-located land to meet the general housing requirements for the district as set out in CS Policy 4. In this respect and for the following reasons I contend that the subject site is very well placed for an additional or replacement allocation.

- In the first instance and as previously stated, Longton, as a *Rural Local Service Centre* subject to CS Policy 1(e) with a wide range of services and facilities is an appropriate settlement to accommodate any additional or replacement housing needs.
- The subject site is only 0.9 hectares and would form a natural extension of site Q (1.1 hectares) resulting in a possible total allocation of approximately 2.0 hectares.
- The resultant site size would more readily enable the provision of much needed affordable housing at this part of Longton and which is most unlikely to be forthcoming from the current allocation for site Q. In this respect it is noted that CS Policy 7: *Affordable and Special Needs*

Housing requires sufficient provision of such housing and applies a minimum threshold of 15 dwellings before the need for affordable housing would be triggered at a site such as the currently allocated site Q. The stated capacity in the DPD for this site is 10 dwellings. Furthermore, I note that the site has been the subject of a very recent planning application (07/2013/0063/FUL) for 14 dwellings and that the applicants are not proposing any affordable housing on the basis that CS Policy 7 would not require any in this instance. The allocation of the subject site in addition to the current allocation for site N could however result in a total provision of around 25 dwellings thereby creating the potential for around 30% of the dwellings to be for affordable housing. It is accordingly contended that an amended allocation for site Q to incorporate the subject site would more readily satisfy the provisions of of CS Policy 7.

- The justification text at paragraph 10.37 of DPD Policy G4: *Protected Open Land* states that the Council wishes to protect valuable open areas of land to ensure natural breaks in the built-up areas and settlements. It also states that the intention of the policy is to retain the openness and natural character of local areas. At paragraph 10.38 it additionally states that the land fulfils a key role in the character, appearance and openness of the settlement and that as such it is worthy of protection in its own right. It is contended that the subject site is no different in character, appearance or openness to the

adjoining site Q which is allocated for housing and does not therefore fulfil the stated reasons for the allocation of the site as *Protected Open Land*.

- I am not aware of there being any technical reason why the subject site of 0.9 hectare would not be an appropriate site to accommodate an additional allocation.

8. Summary and Conclusion

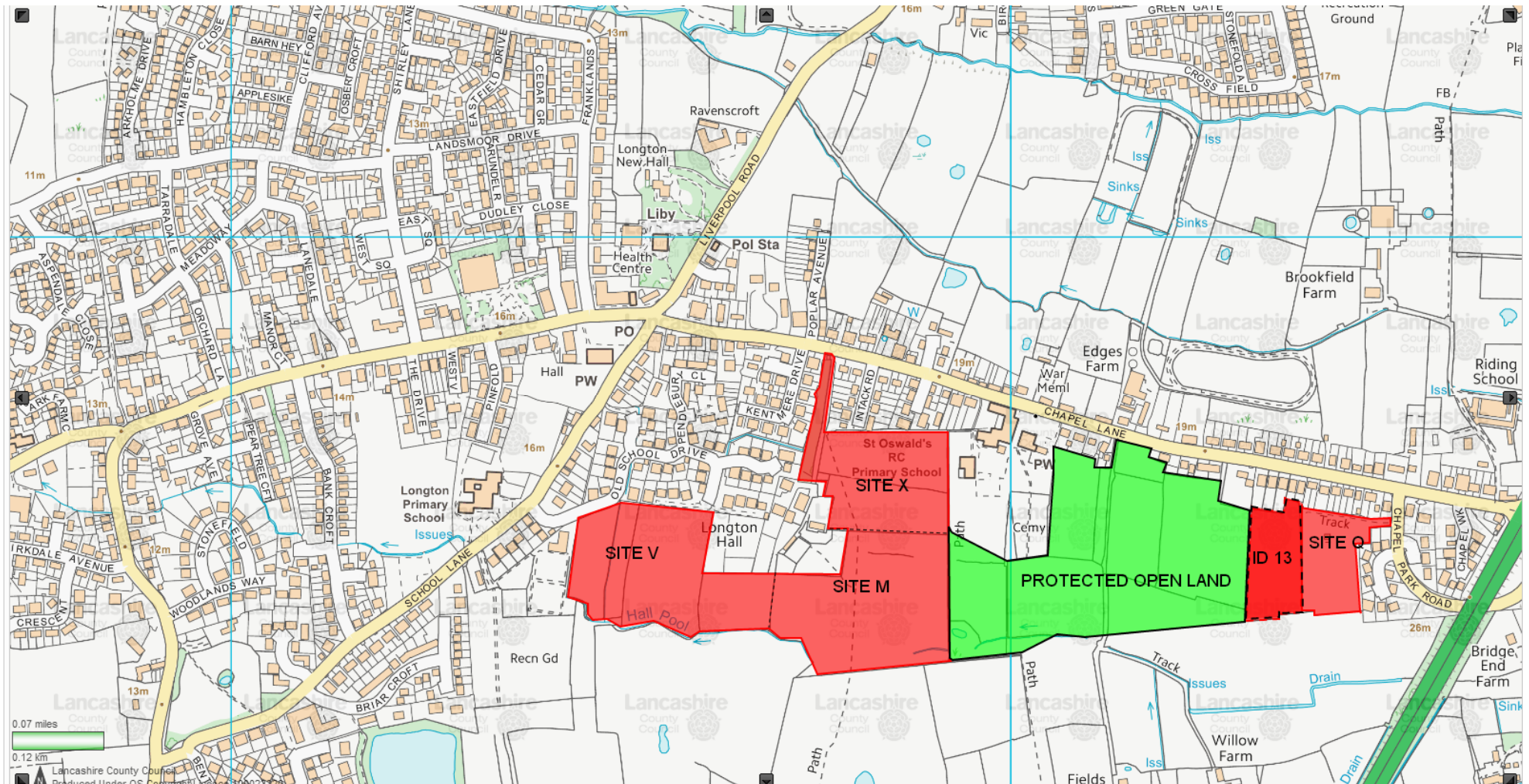
- If the Inspector considers that the DPD is unsound as a result of insufficient housing land having been allocated, then the subject site, being within a CS Policy 1(e) settlement, would be an appropriate allocation as a small scale extension to Site Q.
- In any event, it is considered that the DPD is unsound in that the extent of the allocations at CS Policy 1(f) villages would appear to not reflect the provisions of that policy. In this respect a redistribution of part of the Site N allocation over to Longton, as a CS Policy 1(e) settlement, would more appropriately reflect the CS settlement hierarchy of Policy 1. It is accordingly requested that the subject site be allocated for housing.
- In addition, the allocation of the subject site as an extension to Site Q would, unlike the current allocation, result in the overall requirement for 30% affordable

housing to be provided which would more readily accord with the provisions of CS Policy 7.

- Furthermore, the allocation of the small subject site for housing would not undermine the intentions of DPD Policy G4 particularly as there would remain a large area of Protected Open Land as identified on the attached plan DR1.

David Roocroft

February 2013



REPRESENTOR REF. 10 REPRESENTATION ID: 13 **PLAN DR1**