

SOUTH RIBBLE BOROUGH COUNCIL: EXAMINATION OF THE SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES DEVELOPMENT PLAN DOCUMENT

WRITTEN STATEMENT PREPARED BY TURLEY ASSOCIATES ON BEHALF OF REDROW HOMES LTD (LANCASHIRE DIVISION)

HEARING AGENDA MATTER 3: HOUSING – CHAPTER D

REPRESENTOR NUMBERS: 233 and 236

HEARING DATE: 6 AND 7 MARCH 2013

Introduction

This Statement is provided by Turley Associates (TA) on behalf of Redrow Homes Ltd (Lancashire Division) ('Redrow'). It responds to the questions asked by the Inspector in respect of Matter 3: Housing – Chapter D.

The principal issue identified by the Inspector at Matter 3 is:

Is the Plan's approach to housing justified, consistent with national planning policy and capable of effective implementation?

Paragraph 47 of the NPPF seeks to “boost significantly” the supply of housing. To achieve this goal, it confirms local authorities should identify a supply of specific deliverable sites, which should include a 5% buffer or a 20% buffer of additional sites, depending on whether there has been ‘persistent under delivery’. South Ribble has not met the RSS annual housing requirement since the period 2005 – 2006 and they have accepted in Policy D2 the need to work to a 20% buffer in order to assist housing delivery in the borough. This is to be achieved by allocating land in excess of their basic five-year housing requirement.

Nevertheless, in light of recent appeal decisions, discrepancies in the Council's evidence base and concerns regarding the delivery of some sites identified in the Site Allocations document, there remain general concerns regarding the potential to meet objectively-assessed housing needs. In light of this, Redrow consider that in the interests of addressing these issues and securing a justified and effective plan, it is imperative that deliverable housing sites, such as allocations CC, DD, P, M, V and X and the omission site at Claytongate Drive are secured as allocations in the Site Allocations and Development Management Policies Development Plan Document (SADMDPD).

These concerns are explored further below through responses to the specific questions set out in Matter 3, focussing on questions 2 and 3 (Redrow have not responded on Question 1 relating to Gypsy and Traveller sites). Each question is addressed in turn below.

Question 2 (General – Policies D1 and D2): 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?

The current under-supply of deliverable housing sites against the Core Strategy requirement of 417 dwellings per annum is well documented. A recent appeal by Wain Homes (reference APP/F2360/A/12/2168530) for their site at Long Moss in May 2012 clearly identifies a deliverable supply of less than five years. In his assessment of that appeal, the Inspector did not set out an exact figure for supply, but held that the deliverable supply was likely to be somewhere between the 4.3 years claimed by the Council and the significantly lower 1.8 years claimed by the appellant. This substantial disparity in calculated supply brings into question the potential deliverability of housing sites in South Ribble's claimed supply and the ability of those sites to meet objectively assessed needs. Whilst Redrow is not seeking to question specific sites identified in the SADMDPD, issues regarding the phasing of some notable sites were raised at earlier consultation stages (see Redrow's previous representations, in particular commentary relating to the phasing of site EE – 'Pickering's Farm').

The Council's Housing Land Position Statement, dated October 2012 (CD4.2), provides an update on the residual housing requirement in the borough. This confirms that the shortfall against the target housing requirement of 417 dwellings per annum is now 560 dwellings (referred to in Paragraph 7.12 of the Publication document); a shortfall that the Council propose should be recovered over the entire plan period, rather than in the first 5 years (the latter being known as the Sedgefield approach¹). The difference between the two approaches is significant, with the Council's approach resulting in a residual annual housing requirement of 457 dwellings over the remainder of the plan period, whilst the (preferred) Sedgefield approach would result in a 5-year requirement of 529 dwellings per annum.

The Government has made clear through a number of other recent appeal decisions² that local authorities should seek to address any shortfall in housing delivery in the short-term (i.e. within 5 years using the Sedgefield approach). Given the clear national imperative to increase the supply of housing, and the particular need to remedy the situation of persistent under-delivery in the borough, the SADMDPD should adopt the Sedgefield approach and aim to ensure that sufficient sites are identified and brought forward in the early part of the plan period. This would bring the 5 year requirement with 20% buffer to **3,062 dwellings** (417 x 5 + 20% + 560) and would accord with both national policy on housing delivery and Core

¹ Document Land Supply Analysis Checks (Communities and Local Government, 2009)

² appeal decisions APP/X3025/A/10/2140962 dated 30th June 2011; APP/C3810/A/11/2155343 dated 19th; November 2011 and APP/C1625/A/11/2165865 dated 28th May 2012

Strategy Strategic Objectives of fostering growth (SO1) and making available and maintaining a supply of deliverable housing land (SO5). It would also accord with Housing Policy 4 (criterion c) of the Core Strategy which seeks to ensure sufficient, deliverable housing land to meet need.

In the circumstances, the allocations identified in the SADMDPD for the first 5 years of the plan period are not sufficient to meet the (Sedgefield approach) target. In any event, the allocations for 2,712 dwellings are only just sufficient to meet the council's preferred 5-year target of 2,702 dwellings (5 years x 457 plus 20% buffer). In the circumstances, the plan does not pro-actively plan to deliver housing and make up the shortfall that has occurred to date. Further, should the allocated sites in Policy D1 fail to deliver to the extent anticipated by Wain Homes, then the housing shortfall would be exacerbated.

In order to address the above concerns it is essential that the plan identifies sufficient deliverable sites within the first phase, such as those previously promoted by Redrow (sites CC, DD, the omission site, P, M, V and X).

Question 3 (Housing Sites): Are the allocated sites, on the available evidence, appropriate, justified and deliverable having regard to the alternatives? Have alternatives been subject to adequate sustainability appraisal and consultation?

Redrow refer to their previous representations that have been submitted in relation to sites CC, DD and the omission site, P, M, V and X. The allocation of each of these sites is justified on the basis that they are deliverable and developable in accordance with Paragraph 47 of the NPPF and the definitions set out in footnotes 11 and 12 of that document. In addition, Redrow would like to add the following points:

Site P

Site P has been the subject of a development strategy exercise, undertaken by Redrow, which sets out the proposed phasing to deliver that large allocation. The document helped to inform the phasing strategy taken forward in the SADMDPD and is fully supported as being achievable. The document is appended to this statement for reference.

The allocation and phasing strategy adopted by the Council in Policy D1 for site P is considered to be sound. However, Paragraph 7.43 of the SADMDPD indicates that the development would be expected to deliver on-site affordable housing, as well as providing land for an extension to Worden Park. While this is also supported, the extent of land required for Worden Park is not identified on the Proposals Map; in the circumstances, the plan does not provide clarity or the certainty that developers require.

As the site is deliverable (in the context of the tests set out paragraph 47 and footnote 11 of the NPPF), the allocation of the site in Policy D1 is considered to be justified and consistent

with national planning policy. However, the allocation is considered unsound in the absence of clear guidance regard the extent of land required for the Worden Park extension.

Omission Site (Extension of Allocation DD)

The 'omission site' was promoted through previous stages of the SADMDPD as an extension to the Gas Holders site (site DD). This land is located adjacent and to the north of Redrow's existing Claytongate Drive site (permission reference '07/2010/0472/FUL). A plan is enclosed identifying the site and highlighting how the development of site DD will remove a current HSE Consultation Zone which previously restricted the comprehensive masterplanning of this area as part of that application.

The Council has reviewed Redrow's representations and it originally confirmed at page 44 of document SRSD002a (Summary of Representations Received up to and Including 15/8/12) that the site would be appropriate for allocation in the SADMDPD:

"With the withdrawal of the safety zone, the Council accepts that the land south of allocation DD should be allocated for residential development. Minor Change required to Proposals Map, and to Table 2 if this change is accepted by the Inspector (in negotiation with the developers)."

However, recent correspondence with the Council, enclosed with this statement has confirmed that this statement was an error and that, in their opinion, it is too late to submit additional sites. However, the Inspector's note on Question 3 confirms, *"Representors seeking to promote additional sites are asked to demonstrate that the tests set out in this question are satisfied"*. Therefore, contrary to the view of the Council, it would appear that there remains an opportunity to allocate the site. Indeed, in light of Redrow's views with regard to the Council's housing supply referred to in Question 2 of this Hearing Statement, it is considered every effort should be taken to secure allocations and provide certainty for developers at the forward planning stage to ensure the delivery of new housing in the next 5 years.

Redrow therefore enclose below a supplementary assessment regarding the deliverability of the omission site for consideration:

Supplementary Assessment: Deliverability of the Omission Site

Foot note 11 to Paragraph 47 of the NPPF confirms that for a site to be considered deliverable, sites 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. The omission site at Claytongate Drive complies with these requirements:

- **Available** – the omission site is available for development now. The development of site DD will remove a current HSE Consultation Zone which previously restricted the comprehensive masterplanning of this area as part of their planning application

(reference 07/2010/0472/FUL). The removal of this restriction and availability has been confirmed by the Council in document document SRSD002a (see above).

- **Suitable** – the site is located in a sustainable location within the main urban area, and it would comprise a natural extension to the Claytongate Drive development, which has recently been completed by Redrow. The site is located in the vicinity of shops, services and public transport. Redrow could provide a range of housing to meet local needs and the development of the site would contribute to the creation of a sustainable, mixed community in Lostock Hall. The site does not contain any overriding technical or physical constraints that would potentially impede the delivery of housing on site.
- **Achievable** – Redrow controls the site and the company has a successful track record in delivering good quality housing directly adjacent to the site. The site measures 1.2 hectares and it is considered that if the development density of the adjacent Claytongate Drive site were used as a benchmark for development (see enclosed plan which identifies the permitted scheme), the site could readily provide a viable development comprising up to 30 family dwellings in the next 5 years.

As we have only been made aware of the Council error at the very latest stage in the proceedings, a full site specific Sustainability Appraisal has not been prepared for submission. However, in light of the proximity to site CC also located on Claytongate Drive, it is considered the Council's Sustainability Appraisal in document SRSD005 would be equally relevant to the omission site. The summary statement for site CC on page 31 of that document confirms:

“The site scores well on the sustainability appraisal as it has good access to services, healthcare and employment opportunities. The site would not have adverse effects on biodiversity or heritage and is deliverable. It is in an existing built-up area and is linked to an adjacent site that has planning permission and is under construction for residential use.”

A copy of the full Sustainability Appraisal from document SRSD005 is enclosed with this Hearing Statement, which has been amended with regards to access and flood risk (identified as tracked changes). These changes confirm the site would score more favourably than site CC, based on there being no access or flood risk constraints.

Based on this assessment, the omission site off Claytongate Drive is a prime candidate for early development in accordance with the identified Phasing Strategy in draft Policies D1 and D2. Redrow consider the allocation of the site in accordance with this strategy will help ensure a continuous supply of housing from the site over the plan period, which is in accordance with national planning policy, Ministerial Statements and the Central Lancashire Core Strategy.

Conclusion

Redrow consider that for the plan to be sound and ensure delivery of sufficient new housing to meet national policy objectives, it is necessary to allocate and bring forward additional housing sites in the first five years of the plan period. In tandem with this, it is therefore essential that deliverable sites (such as sites CC, DD, P, M, V and X) are retained as allocations in the plan and, if necessary, brought forward for development in the first phase.

Further, it is considered important that the omission site at Claytongate Drive is allocated as originally indicated by the Authority. The site offers an opportunity to further bolster the Council's housing supply by up to 30 units and every effort should be made to provide certainty for Redrow by allocating the site now.

All the above sites are considered to be justified and deliverable given their location within the main urban areas of the borough and lack of any insurmountable technical or other constraints.