

Land at south of Whittingham Lane, Grimsargh

Planning Statement

Affordable Housing Statement

Addendum

indigo.

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Grimsargh**
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August 2018

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1. Introduction

- 1.1. This Planning Statement Addendum has been prepared on behalf of Seddon Homes Limited (Seddon), in relation to a planning application (ref. 06/2018/0711) at land south of Whittingham Lane, Grimsargh for:

“Outline application for up to 70 dwellings with associated infrastructure with all matters reserved except for access.”

- 1.2. This Addendum has been prepared following the publication of the revised National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) in July 2018, as requested by the case officer. It considers the implications of new national policy upon the determination of the planning application and should be read alongside Indigo’s original submitted Planning Statement (June 2018).

- 1.3. This Addendum is structured as follows:

- Section 2: National Planning Policy;
- Section 3: The Case for Development;
- Section 4: Affordable Housing Statement; and
- Section 5: Conclusions.

2. Planning Policy

National Planning Policy Framework (2018)

- 2.1. The revised NPPF was published on 24 July 2018 and is a key material consideration in the determination of planning applications from the day of its publication.

Achieving sustainable development

- 2.2. Sustainable means meeting the needs of the present without compromising the ability of future generations to meet their own needs (paragraph 8). The planning system has three overarching objectives in achieving sustainable development: economic, social and environmental.
- 2.3. Planning should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).
- 2.4. At the heart of the NPPF is the ‘presumption in favour of sustainable development’ (“the presumption”) set out at paragraph 11, which establishes the planning principles in pursuing sustainable development in a positive way.
- 2.5. Proposals that accord with an up to date development plan should be approved without delay. Where there are no relevant development plan policies or the policies which are most important for determining the application are ‘out of date’, permission should be granted unless:

“i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

- 2.6. Footnote 7 states for applications involving the provision of housing, policies will be ‘out of date’ in situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer) or where the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years (from November 2018).
- 2.7. Paragraphs 14 and 216 clarify the adverse impact of allowing development in conflict with a neighbourhood plan is likely to significantly and demonstrably outweigh the benefits if:
- a) the neighbourhood plan was part of the development plan before the date on which the decision is made (up to and including 11 December 2018) or became part of the development plan two years or less before the date on which the decision is made (from 12 December 2018); and
 - b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement; and
 - c) the local planning authority has at least a three year supply of deliverable housing sites; and
 - d) the local planning authority’s housing delivery was at least 25% of that required

over the previous three years (from November 2018, stepping up to 45% in November 2019).

- 2.8. Paragraph 48 states weight may be given to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections and the degree of consistency with the NPPF.
- 2.9. Paragraph 213 clarifies existing policies should not be considered out-of-date simply because they were adopted prior to the publication of the revised NPPF. Due weight should be given to them, according to their degree of consistency with the NPPF.

Delivering a sufficient supply of homes

- 2.10. Paragraph 59 makes clear to support the Government's objective of significantly boosting the supply of homes, a sufficient amount and variety of land should come forward where it is needed, addressing the needs of groups with specific housing requirements and that land with permission is developed without unnecessary delay.
- 2.11. Paragraph 60 states to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national practice guidance, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. Any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 2.12. Paragraph 33 clarifies relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly and they are likely to require earlier review if local housing need is expected to change significantly in the near future.
- 2.13. Paragraph 61 recommends the size, type and tenure of housing needed for different groups in the community should be recognised, including affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.
- 2.14. Paragraph 64 requires at least 10% of the homes on major housing developments to be made available for affordable home ownership, unless this would exceed the level of affordable housing required in the area or significantly prejudice the ability to meet the identified needs of specific groups.
- 2.15. Paragraph 72 acknowledges the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.
- 2.16. Paragraph 73 states local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old (unless these strategic policies have been reviewed and found not to require updating).
- 2.17. Annex 2 (Glossary) states to be considered deliverable, sites for housing 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. Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 2.18. Paragraph 73 goes on to state the supply of specific deliverable sites should in addition

include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
 - b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
 - c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.
- 2.19. Paragraph 74 clarifies a five year supply of deliverable housing sites (with the appropriate buffer) can be demonstrated where it has been established in a recently adopted plan or in a subsequent annual position statement which:
- a) has been produced through engagement with developers and others who have an impact on delivery and been considered by the Secretary of State; and
 - b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.
- 2.20. Paragraph 75 adds where the Housing Delivery Test indicates delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years.
- 2.21. Paragraph 77 highlights in rural areas, decisions should be responsive to local circumstances and support housing developments that reflect local needs.
- 2.22. Paragraph 78 adds to promote sustainable development in rural areas, housing should be located where it will enhance the vitality of rural communities.

Promoting healthy and safe communities

- 2.23. Paragraph 91 aims to achieve healthy, inclusive and safe places which promote social interaction (eg through street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods and active street frontages). Developments should be safe and accessible (eg through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas). They should also enable and support healthy lifestyles (eg through the provision of safe and accessible green infrastructure, sports facilities, local shops and layouts that encourage walking and cycling).
- 2.24. Paragraph 96 identifies access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities.
- 2.25. Paragraph 98 suggests protecting and enhancing public rights of way and access, including taking opportunities to provide better facilities for users, eg by adding links to existing rights of way networks.

Promoting sustainable transport

- 2.26. Paragraph 102 requires transport issues to be considered from the earliest stages of development proposals, so that the potential impacts on transport networks can be addressed; opportunities from existing or proposed transport infrastructure, technology and usage are realised; opportunities to promote walking, cycling and public transport use are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to

making high quality places.

- 2.27. Paragraph 103 recommends significant development should be focused on locations which are or can be made sustainable. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas and this should be taken into account.
- 2.28. Paragraph 110 highlights applications should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; address the needs of people with disabilities and reduced mobility; create places that are safe, secure and attractive; allow for efficient delivery of goods and access by service and emergency vehicles; and be designed to enable charging of plug-in and other ultra-low emission vehicles.

Making effective use of land

- 2.29. Paragraph 117 promotes an effective use of land in meeting the need for homes and other uses while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 2.30. Paragraph 120 states decisions need to reflect changes in the demand for land and be informed by regular reviews of land allocated for development in plans and of land availability.
- 2.31. Paragraph 122 supports development that makes efficient use of land, taking into account the identified need for different types of housing and the availability of land suitable for accommodating it; local market conditions and viability; the availability and capacity of infrastructure and services as well as their potential for further improvement and scope to promote sustainable travel modes that limit future car use; the desirability of maintaining an area's prevailing character and setting; and the importance of securing well-designed, attractive and healthy places.
- 2.32. Paragraph 123 makes clear where there is an existing or anticipated shortage of land for meeting identified housing needs, homes should not be built at low densities and ensure developments make optimal use of the potential of each site. Authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

Achieving well designed places

- 2.33. Paragraph 124 states the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 2.34. Paragraph 127 ensures that developments will function well and add to the quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting; establish or maintain a strong sense of place; accommodate and sustain an appropriate amount and mix of development including greenspace and support local facilities and transport networks; and create places that are safe, inclusive and accessible and which promote health and wellbeing.

Meeting the challenge of climate change, flooding and coastal change

- 2.35. Paragraph 150 requires new development to avoid increased vulnerability to the range of impacts arising from climate change and help reduce greenhouse gas emissions.
- 2.36. Paragraph 163 stipulates local planning authorities when determining applications should

ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site specific flood risk assessment (containing a sequential and exception test as applicable).

- 2.37. Paragraph 165 expects major developments to incorporate sustainable drainage systems, unless there is clear evidence they would be inappropriate.

Conserving and enhancing the natural environment

- 2.38. Paragraph 170 requires the contribution and enhancement of the local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; recognising the intrinsic character and beauty of the countryside and wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, trees and woodland; minimising impacts on and provide net gains for biodiversity; and preventing new development being subject to unacceptable levels of soil, air, water or noise pollution or land stability.
- 2.39. Paragraph 175 states significant harm to biodiversity should be avoided or adequately mitigated, or as a last resort, compensated for. The loss or deterioration of irreplaceable habitats should be avoided unless there are wholly exceptional reasons and a suitable compensation strategy exists.
- 2.40. Paragraph 178 ensures a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination.
- 2.41. Paragraph 180 expects new development is appropriate for its location, taking account the likely effects of pollution on health, living conditions and the natural environment.
- 2.42. Paragraph 181 highlights sustaining and contributing towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified.

Definition of affordable housing

- 2.43. Annex 2 (Glossary) provides an amended definition of affordable housing. It now includes starter homes and discounted market sales housing in addition to more traditional affordable housing models:

“Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

b) Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set

out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement."

Planning Practice Guidance

- 2.44. PPG is published online and individual sections are updated at different times. It is stated that the PPG will, where necessary, be updated 'in due course' to reflect changes to the revised NPPF.

Housing and economic development needs assessments

- 2.45. At the time of writing, only part of the housing and economic development needs assessments section had been updated on 24 July 2018. This provides guidance on how the minimum annual local housing need figure should be calculated using the standard method (referred to in paragraphs 60 and 73 of the NPPF).
- 2.46. However, a health warning should be applied to this guidance with a statement confirming (emphasis added):

"The government is aware that lower than previously forecast population projections have an impact on the outputs associated with the method. Specifically it is noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September 2018.

*In the housing white paper the government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, **we will consider adjusting the method after the household projections are released in September 2018. We will consult on the specific details of any change at that time.***

It should be noted that the intention is to consider adjusting the method to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in Planning for the right homes in the right places consultation and continues to be consistent with ensuring that 300,000 homes are built per year by the mid 2020s."

- 2.47. We understand the household projections will be published on 20 September 2018, although no details for the proposed public consultation or an expected date when the revised

standard method will be published.

- 2.48. In the interim, we also note that a final version of the standard method table ('Application of proposed formula for assessing housing need, with contextual data', last published 14 September 2017) has not been released.

Viability

- 2.49. The viability section of the PPG was updated alongside the revised NPPF on 24 July 2018.
- 2.50. Paragraph 007 (ref. 10-007-20180724) states where up to date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.
- 2.51. Paragraph 008 (ref. 10-008-20180724) clarifies the weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case.

Housing Delivery Test measurement rule book

- 2.52. The Housing Delivery Test measurement rule book was published alongside the revised NPPF on 24 July 2018. It explains how the housing delivery test referred to in paragraphs 11 (footnote 7), 75 and 215 of the NPPF will be applied, once it comes into effect on the day following publication of the results in November 2018.
- 2.53. There is a phased application of the Housing Delivery Test (paragraph 215 of the NPPF). The 'delivery of housing which was substantially below the housing requirement' means where the results published in:
- November 2018 indicate that delivery was below 25% of housing required over the previous three years;
 - November 2019 indicate that delivery was below 45% of housing required over the previous three years;
 - November 2020 and in subsequent years indicate that delivery was below 75% of housing required over the previous three years.

Emerging Local Plan

- 2.54. On 17 August 2018, the three Central Lancashire authorities formally marked the commencement of the Local Plan Review with the launch of an initial Call for Sites consultation.
- 2.55. Submissions are invited from sites that may be available for development over the next 15 years to help inform future decisions on allocations in the Local Plan.
- 2.56. The following updated timescales for the Local Plan are now envisaged:

Stage	Dates
Call for Sites	17 August to 9 November 2018
Issues and Options consultation	December 2018 to January 2019
Publication Draft consultation	Spring 2019
Submission to Secretary of State	Autumn 2019
Examination	Spring 2020

Stage	Dates
Adoption	Winter 2020

3. The Case for Development

- 3.1. This section focuses on how revised national policy has impacted upon the case for development. As the case for development and rationale for the application has not changed, it is structured around the same subheadings as provided in the original Planning Statement (June 2018).
- 3.2. However, it does not represent the full justification supporting the site's development (including an assessment of other material considerations). This is provided in the original Planning Statement (June 2018) and is not repeated here. The Addendum should therefore be read alongside that document.

Housing land supply

- 3.3. The requirement to demonstrate a five year supply of specific deliverable sites has been maintained in the revised NPPF at paragraph 73. Footnote 7 makes clear the presumption (or the "titled balance"), now in paragraph 11, applies where a five year supply (with the appropriate buffer) cannot be demonstrated.
- 3.4. The council cannot demonstrate a five year housing land supply and therefore the findings of the Inspector in the Broughton appeals (APP/N2345/W/17/3179105 and APP/N2345/W/17/3179177) are relevant to this application. That assessment found there to only be a 3 to 3.5 year supply. No further appeal decisions have been issued which contradict these findings.
- 3.5. Whilst a lower threshold of housing delivery is now afforded to areas with adopted neighbourhood plans that meet the four qualifying criteria at paragraph 14 of the NPPF, the emerging Grimsargh Neighbourhood Plan has not progressed any further since reported in the original Planning Statement and remains at an embryonic stage. It therefore still holds very little weight and given this, paragraph 14 of the NPPF is not relevant in the determination of this application.
- 3.6. Footnote 7 clarifies the titled balance applies where the local planning authority cannot demonstrate a five year supply of deliverable housing sites with the appropriate buffer or where the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years. The titled balance applies to decision making in Preston due to a lack of a five year housing land supply (ie the presumption applies where either the housing delivery test is failed or there is no five year supply).
- 3.7. Paragraph 60 of the NPPF requires strategic policies to be informed by a local housing need assessment. It states the standard method should be used unless exceptional circumstances justify an alternative approach. Paragraph 73, footnote 37 and the Housing Delivery Test measurement rule book state this figure should be used to assess the five year housing land supply and housing delivery test where the strategic policies are more than five years old, unless these strategic policies have been reviewed and found not to require updating.
- 3.8. Although the adopted Central Lancashire Core Strategy is over five years old, by the government's own admission, there are concerns with the standard method, particularly with the forthcoming publication of new household projections on 20 September 2018. A final standard method table detailing the targets for each authority has not been published in the interim. As such, the new standard method should be afforded limited weight. Furthermore, the local housing need using the standard method is referred to as the starting point. In the

case of Preston City Council there may be factors which generate more housing need than that produced by the Government's standard method. Those factors could include (inter alia):

- i. the need to promote economic growth
- ii. the need to address the problem of out-migration from the council's administrative area.

- 3.9. Therefore, we consider that the currently adopted housing requirement for Preston of 507 dwellings per annum (dpa), as set out in Policy 4 of the Central Lancashire Core Strategy, is still relevant, as confirmed by the Memorandum of Understanding (MoU) (October 2017) signed between the three authorities. We are of the firm view that any departure from this position would require the discussion with an approval of all three authorities.
- 3.10. A Local Plan review is underway which will determine whether the existing figure, in the context of the forthcoming household projections and revised standard method, needs revising. The application, if approved, will make a meaningful contribution to the current severe shortfall and the delivery of open market and affordable housing should be afforded significant weight in the planning balance.
- 3.11. Even if the council was able to demonstrate a five year housing land supply, the targets are still viewed as an absolute minimum as it is the government's clear objective, at paragraph 59 of the NPPF, to significantly boost the supply of homes. Together, the original Planning Statement (June 2018) and this Addendum demonstrate the site is a sustainable, well located site and that there are no overarching significant adverse impacts which outweigh the benefits of the scheme.

A suitable location for housing

- 3.12. The site still comprises a logical infill site on the edge of the existing settlement boundary of Grimsargh and within close proximity of the existing residential area.
- 3.13. Paragraph 72 of the NPPF gives helpful direction by encouraging extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Paragraphs 77 and 78 further emphasise that housing should be located where it will enhance the vitality of rural communities and reflect local needs.
- 3.14. In this regard, it has already been demonstrated through the original Planning Statement (June 2018) that the site is well located and supported by necessary infrastructure and facilities.
- 3.15. In addition, as this is an outline application, issues of design (appearance, landscaping, layout and scale) can be appropriately be dealt with at the reserved matters and detailed design stage. However, the submitted Development Framework Plan (Drawing no: 8450-L-02) shows how the site will respond to the character of the local area and provide residential areas, together with public open space, landscaping and the retention and enhancement of existing vegetation and ponds. Paragraphs 124 and 127 of the NPPF which encourage good design will therefore be satisfied.
- 3.16. The development will also contribute towards local needs by providing much needed family and affordable housing and address the severe housing shortfall. The additional households generated by the development will be supported by and contribute to existing infrastructure and services, such as through additional spend.
- 3.17. As explained in the original Planning Statement, the application will provide a density of 25 dwellings per hectare (dph), which accords with the character of the location and approved developments adjacent to the site. However, paragraph 123 of the NPPF suggests where there is an existing or anticipated shortage of land for meeting identified housing needs, even higher densities should be considered to make optimal use of the potential of each site.

- 3.18. Therefore, the applicant has sought to achieve an appropriate balance between addressing the identified severe shortfall of housing by making optimal use of the site while responding to character of the local area and the natural environment, mindful of paragraph 170 of the NPPF. A sustainable balance has been struck in the proposals which accords with Policy 5 (Housing Density) of the Central Lancashire Core Strategy.

Accessibility and sustainability

- 3.19. The conclusions of the site's accessibility and sustainability have not changed in light of the revised NPPF.
- 3.20. Our community infrastructure audit, provided in Appendix 1 and 2 of the original Planning Statement (June 2018), demonstrates Grimsargh benefits from good access to services, jobs, facilities and bus services. The village itself contains a pharmacy, village store, post office, cricket club, football club, local play area, a pre-school, primary school, church, pub and takeaway.
- 3.21. The site can therefore be concluded to be in a sustainable location with good transport links and served by a range of facilities and services, in compliance with paragraph 102 of the NPPF.
- 3.22. The site will also result in a healthy, inclusive and safe place which promotes social interaction, in accordance with paragraph 91 of the NPPF.

Compliance with the Development Plan

- 3.23. Our conclusions on the compliance of the application's proposals against the main key policies have not changed in light of the revised NPPF. These are set out in detail in our original Planning Statement (June 2018).
- 3.24. There is a severe housing shortfall in Preston and therefore the tilted balance in paragraph 11 of the NPPF is engaged.
- 3.25. Paragraph 213 of the NPPF also states existing policies should be given weight according to their degree of consistency with the NPPF
- 3.26. We summarise the weight to be given to relevant policies below:
- Policy 1 (Locating Growth) – is clearly out of date and therefore housing development should be allowed on sustainable and deliverable sites on the edge of “smaller villages”, such as the application site to ‘make good’ the shortfall. Even if the policies were attached full weight, the site offers a range of public benefits, which outweigh any conflict;
 - Policy 4 (Housing Delivery) – we still attach some weight to Policy 4 in light of the signed MoU (October 2017) and paragraphs 60 and 73 of the NPPF;
 - Policy EN1 (Development in the Open Countryside) – is not a policy for the supply of housing and is not out of date;
 - Policy EN4 (Areas of Separation) – is not a policy for the supply of housing and is not out of date;
 - Policy AD1(a) (Development within (or in close proximity to) the Existing Residential Area) – is not a policy for the supply of housing and is not out of date; and
 - Policy HS4 (Rural Exception Affordable Housing) – is not a policy for the supply of housing and is not out of date.
- 3.27. In addition, the emerging Grimsargh Neighbourhood Plan has not progressed to any formal

stage of preparation and therefore does not hold any weight in the determination of this application in line with paragraph 14 of the NPPF.

The Benefits

- 3.28. The benefits of the development as detailed in the original Planning Statement (June 2018) and have not changed. They form the positive side of the planning balance as required by paragraph 11 of the NPPF.
- 3.29. In summary, the benefits to the Grimsargh and Preston area include:
- Construction of up to 70 dwellings, including 35% affordable housing;
 - Provision of amenity greenspace;
 - A meaningful contribution towards the severe shortfall of housing in Preston;
 - Over £623,968 per annum of increased consumer spending by the proposed new households;
 - £129,164 per annum in additional Council Tax payments to Preston City Council;
 - £3.36 million in New Homes Bonus payments to Preston City Council; and
 - Around £3.2 million in GVA added to the local economy through construction employment and 4.6 full time construction jobs created.

4. Affordable Housing Statement

- 4.1. Annex 2 of the revised NPPF (2018) changed the definition of affordable housing to include:
- Affordable housing for rent;
 - Starter homes;
 - Discounted market sales housing; and
 - Other affordable routes to home ownership (including shared ownership, equity loans, other low cost homes for sale and rent to buy).
- 4.2. The council's affordable housing policy requirements are set out in detail in Section 5 of the original Planning Statement (June 2018). There is a target for 35% affordable and special housing in rural areas on sites in or adjoining villages. The presumption is that affordable housing will be provided on-site to create a mix of housing.
- 4.3. In line with paragraph 213 of the NPPF, we consider that weight should still be given to this approach.
- 4.4. As the application is submitted in outline with all matters reserved (except for access) for up to 70 dwellings, the exact number and mix of housing has yet to be determined.
- 4.5. The application site will provide 35% affordable housing on-site, in line with policy requirements. Based on a development for up to 70 dwellings, this would equate to up to 24.5 affordable dwellings being required.
- 4.6. The overall sizes, types and tenures of dwellings, both market and affordable, will be determined at the reserved matters stage and based upon the most up-to-date evidence on local housing need and demand from the SHMA and other market sources. For the avoidance of doubt, this will include a consideration of the tenures now considered to meet the definition of affordable housing in the revised NPPF (2018), as set out at paragraph 4.1 above.
- 4.7. The affordable housing will be 'pepper potted' throughout the site and the design will be 'tenure blind', so that there is no discernible difference in quality, materials or finish. This will help result in the creation of sustainable, mixed communities.
- 4.8. The provision of affordable housing will be secured through a S106 agreement. Draft Heads of Terms are provided at Appendix 7 to the original Planning Statement (June 2018).
- 4.9. The proposals are therefore compliant with paragraph 64 of the NPPF, Policy 7 (Affordable and Special Needs Housing), Policy HS4 (Rural Exception Affordable Housing) and the Affordable Housing SPD. The provision of affordable housing on this site should be afforded significant weight.

5. Conclusions

- 5.1. This Addendum, together with the original Planning Statement (June 2018) and other supporting reports that make up this outline submission, demonstrate that the proposed development comprises sustainable development and accords with revised national planning policy and the development plan as a whole.
- 5.2. These proposals offer a deliverable opportunity for Preston City Council to secure much needed housing development in the form of high quality market and affordable housing in a sustainable location for growth.

The planning balance

- 5.3. The revised NPPF has not changed the tilting of the planning balance.
- 5.4. There is still a severe shortfall of housing and the tilted balance is engaged. The site is a sustainable, well located site and that there are no overarching significant adverse impacts which outweigh the benefits of the scheme.
- 5.5. The site still comprises a logical infill site on the edge of the existing settlement boundary of Grimsargh and within close proximity of the existing residential area.
- 5.6. The conclusions of the site's accessibility and sustainability have not changed in light of the revised NPPF. The site is in a sustainable location with good transport links and served by a range of facilities and services.
- 5.7. The benefits of the development as detailed in the original Planning Statement (June 2018) and have not changed. They form the positive side of the planning balance as required by paragraph 11 of the NPPF.
- 5.8. Our conclusions on the compliance of the application's proposals against the main key policies have not changed in light of the revised NPPF. The weight to be afforded to existing development plan policies has also not changed.
- 5.9. The site will provide 35% affordable housing and will take account of the new definition of affordable housing when determining the provision of appropriate tenures at the reserved matters stage.
- 5.10. The proposals fully accord with the requirements of the NPPF, the CLCS and SADMP by assisting in the creation of a wider choice of high quality homes, widening opportunities for home ownership and creating a sustainable, inclusive and mixed community.
- 5.11. In accordance with the presumption in favour of sustainable development as set out in the NPPF, planning permission should be granted without delay.

