

Ribble Valley Housing and  
Economic Development –  
Development Plan Document  
(HED DPD)



**Regulation 19  
(Publication) comments  
response Form**

Before using this form to make any comments please ensure that you have read the Housing and Economic Development – Development Plan Document and the Guidance Notes, which can be found on Ribble Valley Borough Council's website - [www.ribbonvalley.gov.uk](http://www.ribbonvalley.gov.uk) and follow the HED DPD.

If after reading the Guidance Notes you should have any queries in completing the form please telephone 01200 425111.

This form has two parts: -

**Part A** - Personal Details (you need only complete one copy of Part A)

**Part B** - Your comment(s) (Please complete a separate Part B for each comment you wish to make.)

All completed comments forms must be received by the Council no later than 5:00pm on Friday 9th June 2017.

Please return paper copies marked 'HED DPD PUBLICATION CONSULTATION' to Council Offices, Church Walk, Clitheroe, BB7 2RA

**Part A**

**Q1** Please can you provide the following information which will assist us in contacting you if we need to discuss any of your comments further.

Name

Name of Organisation (if you are responding on behalf of an organisation)

Database Reference number (if you have one)

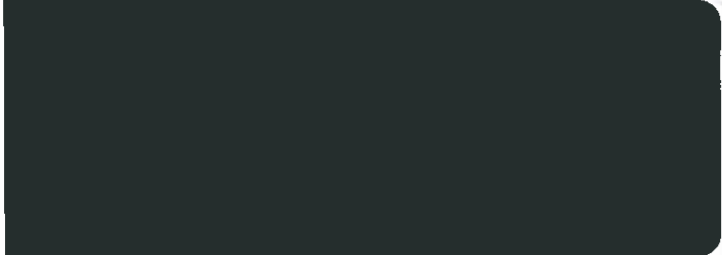
Address

Post Code

Email Address

Phone number





Copies of all comments made in Part B of the form will be put in the public domain and are not confidential, apart from any personal information. All personal information within Parts A and B will only be used by the Council in connection with the Local Development Framework and not for any other purpose and will be held in accordance with the Data Protection Act 1998. The Council will summarise the comments and all representations will be made available to the Planning Inspectorate.

**Q7** Please set out what change(s) you consider necessary to make the HED DPD legally compliant or sound, having regard to the test you have identified at Q5 above where this relates to soundness.

You will need to say why this change will make the HED DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible. *Please continue on a separate sheet if required.*

SEE ATTACHED SHEET

**Please note:** your comment should cover succinctly all the information, evidence, and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be another opportunity to make further comments based on the original comment made at the publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination in the forthcoming Examination in Public. Please note also that the Inspector is not obliged to consider any previous comments that have been made in respect of the HED DPD. You are urged, therefore, to re-submit on this form any previously submitted comments that, in your view, remain valid and that you wish the Inspector to consider.

**Q8** If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination



Yes, I do wish to participate at the oral examination



Q6 The Council does not currently have a 5 year housing supply, therefore it is not in a position to proceed to adopt the DPD. See attached correspondence with the Council regarding its 5 year supply.

Q7 Allocate additional sites to provide a 5 year supply. Sites in sustainable locations such as Higher Road, Longridge are entirely suitable. Even if the council did have a 5 year supply, it could only be considered, at best, marginal. Furthermore the council is not building in a sufficient 'buffer' in its planning strategy for new housing. It will therefore inevitably find it difficult to guarantee a robust supply and ensure choice in the housing market.

Reference may be made to the officer report to committee on planning application reference 3/2016/1082, which offers a sensible and pragmatic analysis of the 5 year housing land supply issue. Paragraphs 5.15 and 5.16 say:

*"Given the marginal supply position as demonstrated in the latest monitoring figures and given that an interim position has demonstrated that the Local Planning Authority may not be able to demonstrate a 5 years supply. Taking a balanced, realistic and pragmatic view, given latest projections, I consider it is not unreasonable to conclude that housing supply may from time to time fluctuate below 5 years.*

*Taking a long-term holistic and strategic view in respect of housing supply within the Borough, it could be argued that the singular solution to ensure that the Local Planning Authority can robustly demonstrate a 5 year supply of housing, both in the long and short term, would be to ensure and maintain an acceptable level or degree of 'oversupply' through the granting of additional consents for housing. It is further considered that the level of 'oversupply' should allow sufficient margins to take into account potential under delivery or take account of the inevitable lag in relation to sites coming forward following the granting of outline consents which inevitably cause fundamental fluctuations in housing trajectories and may result in a legacy of undersupply or under delivery that may become evident in future monitoring."*

I am the selling agent for the land at Barrow and I have no doubt that the figures that have been used in the five year housing land supply are over estimated and in no way achievable. There are no stated assumptions as to why the Council has chosen to anticipate such a high level of supply from this particular site which is inconsistent with other sites within the Borough, both in terms of existing and previous delivery and indicated future delivery. The planning consultants for the site are based in Milton Keynes and it is possible that if they have provided information about expected sales rates they are not in tune with local circumstances. I would be grateful for an explanation for the level of delivery expected from the Barrow site.

In my opinion the Council should provide for an allowance of no more than 40 dwellings per annum from the site in years 3, 4 and 5 in line with what you have anticipated from the other sites that I have referred to above. This alone would see the removal of 120 dwellings from the housing land supply which would not be off-set by the 85 dwellings that have been allowed from the Grimbledeston site in Longridge.

With regard to the site at Barrow, as you are aware it has taken far longer than anyone anticipated to start delivering units on the site and the current arrangements with Redrow Homes, who have submitted a reserved matters application on approximately half of the site, mean that their ultimate acquisition and development of part of the site is subject to the approval of that application and it has not yet been determined. The timescale from taking occupation of a site to the first dwellings being available for occupation is a period of approximately 12 months, this being an allowance of two months for sewer and road construction and six to seven months for a show house to be ready and then several months for completion of the first purchases. This timescale is consistent with the Redrow Homes site in Whalley and their anticipated timescale for Barrow.

Notwithstanding the fact that the owners of the site have submitted a reserved matters application for the remainder of the site we have not yet been instructed to market the rest of the site so there is currently no buyer waiting to take on Phase 2. Furthermore there is off-site infrastructure that needs to be delivered to fully provide for the development of Phase 2 in the form of a significant water main upgrade which is likely to take a minimum of 12 to 18 months to be delivered. All of this raises doubts about the year 2 delivery rate of 40 which we consider should be reduced to 20.

The other major area where housing land supply is open to question is the delivery of housing on the Lawsonsteads Farm site in Whalley in respect of which I am also involved as a joint selling agent. In respect of this site the Council are on the verge of refusing two discharge of condition applications which would, if approved, bring forward the delivery of housing on Phase 2 of this site. The refusal of the applications could mean that development on the second phase might not commence for at least 12 months and consequently it is unrealistic in my opinion to include the whole of this site within the five year supply figures when there might be no delivery for the next two years.

Part B

Please use a separate form for each individual comment.

Q2

Name / Name of Organisation (if you are responding on behalf of an organisation)

[Redacted] [Redacted] →

Q3

To which part of the HED DPD does this comment relate?

Part of document e.g. Housing allocations, open space policy etc...

REG. 19 PUBLICATION DPD  
SECTION 2 HOUSING ALLOCATION  
ALL

Paragraph No.

Q4

As a consequence do you consider the HED DPD is:

- |                      | Yes                      | No                                  |
|----------------------|--------------------------|-------------------------------------|
| i) Legally compliant | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii) Sound *          | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

\* The considerations in relation to the HED DPD being sound are explained in the Guidance Notes

Q5

If you consider the HED DPD is unsound, is this because it is not... (please tick the appropriate box)

- |           |                                     |                                 |                                     |
|-----------|-------------------------------------|---------------------------------|-------------------------------------|
| Justified | <input checked="" type="checkbox"/> | Consistent with national policy | <input checked="" type="checkbox"/> |
| Effective | <input type="checkbox"/>            | Positively prepared             | <input checked="" type="checkbox"/> |

Q6

Please give details of why you consider that the HED DPD is not legally compliant or sound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the HED DPD, please also use this box to set out your comments. Please continue on a separate sheet if required.

SEE ATTACHED SHEET

**Q9**

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. *(Please note that the Inspector will determine who participates.) Please continue on a separate sheet if required.*

SEE ATTACHED SHEET

**Q10**

If you wish to be kept informed as the HED DPD progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the box(es) below.

Submission of the HED DPD to the Secretary of State for independent Examination

The publication of the Inspector's report following the Examination

The formal adoption of the HED DPD

**Q11**

If you have any other comments to make on the HED DPD that have not been covered elsewhere, please use the box below. *Please continue on a separate sheet if required.*

**Q12**

Date of completion: 10/05/2017

**Q13**

Signature

[Redacted Signature] \_\_\_\_\_

Thank you very much for taking the time to complete this comments form, your comments are very much appreciated.

If after reading the Guidance Notes you should have any queries in completing this form please telephone 01200 425111