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23210/A3/LD/VR
30 May 2017

Dear Sir/Madam,

**HOUSING AND ECONOMIC DEVELOPMENT DPD
REGULATION 19 PUBLICATION
REPRESENTATIONS ON BEHALF OF BARRATT HOMES**

On behalf of our Client, Barratt Homes, we set out below our comments in relation to the above document which is currently out to consultation.

Our comments are intended to assist the Council with the Housing and Economic Development DPD ("HED DPD") to ensure the DPD is found sound in the future. We trust our comments are of assistance. Our Client is keen to work in partnership with the Council to help deliver a sustainable Local Plan for the Borough and would welcome the opportunity to discuss our comments further.

Barratt Homes has actively engaged in the Local Plan process to date, having contributed to the Examination into the now adopted Core Strategy, and Issues and Options stage of the HED DPD in October 2016. We refer the Council to our previous representations to be read alongside these representations.

Our Client has a number of land interests within the Borough, having obtained outline planning permission for 363 dwellings (Application Ref: 3/2014/0764) and reserved matters approval for 118 dwellings in 2015 and 2016 respectively for Land at Chipping Lane, Longridge.

We identified a number of concerns with the Issues and Options HED DPD Paper. These concerns have not been addressed, and we set out below our comments and observations in response to the HED DPD, specifically with regard to our Client's existing land interests at Chipping Lane, Longridge.

We object to the HED DPD as drafted on the basis that it is unsound because it is not justified, effective, consistent with national policy or positively prepared.

Evidence Base

The HED DPD continues to be informed primarily by the Core Strategy evidence base, and the consultation only relates to the Regulation 19 Publication report, Draft Infrastructure Delivery Plan, Habitat Regulations Document and Sustainability Appraisal. It specifically excludes background and evidence base documents. It is our view that all documents should be published for consultation to ensure that these can be properly scrutinised for soundness.

Within the Issues and Options HED DPD, it was noted that the Council intended to undertake a "refresh" of its Strategic Housing Market Assessment ("SHMA"), but to date this has not materialised, nor is there any indication of whether this work has commenced or when it is expected to be undertaken. We consider that the "refresh" should have been completed prior to this consultation.



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It was identified within our previous representations to the Issues and Options Paper that to help inform the HED DPD, it is essential for this work to be undertaken. Our position remains unchanged. It is important for this work to be carried out due to the lack of monitoring information available regarding the type and mix of housing which has been delivered since 2008 and the lack of up-to-date information in relation to affordable housing.

A SHMA Refresh will help to inform specific Local Plan targets, as set out in Paragraph 1.7 of the Core Strategy, including the quantum and mix of housing that is required to be delivered over the remainder of the Plan period, aligned to market needs. Without an up-to-date evidence base, there can be no comfort that the Council is pursuing the most appropriate development option.

For the purpose of this HED DPD consultation, the Council utilises a Housing Land Availability Schedule (October 2016), with a base date of 30 September 2016. This only provides half a year of monitoring from 1 April 2016 – 30 September 2016. An updated Housing Land Availability Schedule (which are published bi-annually by the Council) should have been prepared or alternatively the consultation delayed until this information was publicly available. This is to ensure that the most up-to-date position on housing land supply within the Borough is utilised and to clarify the Council's position.

Housing Requirement

It is noted that the Council does not intend to reconsider objectively assessed needs or the overall housing requirement to inform the policies of the HED DPD. This is a missed opportunity and a potential threat to the ability of the Local Plan as a whole to deliver the development needs of the Borough within the Plan period.

The Council outlined a commitment in Paragraph 1.7 of the Core Strategy to review the Borough's Housing Requirement within 5 years of the Core Strategy (December 2014). This means that it should take place between December 2014 and December 2019. It is, therefore, an appropriate opportunity to review the Borough's housing requirement now prior to the adoption of the HED DPD (envisaged to be early 2018 at the earliest), because otherwise the HED DPD may have to be reviewed almost immediately after it is adopted, if a need to allocate additional land for housing is identified. This would result in the HED DPD not being found sound because it would not have been positively prepared or effective in allowing for potentially revised development needs.

We remain concerned by the Council's approach of treating the Core Strategy housing requirement of 5,600 dwellings across the Plan period, (2008 - 2028) as a maximum target, rather than a minimum requirement.

The Housing Land Availability Statement (October 2016) states that 1,549 dwellings have been built to date in the Plan period, with planning permission for a further 4,224 dwellings, and an overall claimed supply of 5,773 dwellings. This equates to only 173 dwellings over the minimum requirement of 5,600 dwellings, which provides a 3% buffer. This buffer does not provide or account from non-delivery or under-delivery of allocations and sites with planning permission.

We previously highlighted a concern within our representations to the Issues and Options Paper, that this buffer is inadequate, and fails to provide or account from non-delivery or under-delivery of allocations and sites with planning permission.

To meet the housing requirement within the Borough, the Council's approach is to rely on large scale sites, such as the Strategic Site at Standen (Ref: 3/2012/0942) and Land to the south and west of Barrow (Ref: 3/2012/0630) to deliver the much-needed housing requirements. However, these are sites which have continuously failed to come forward and deliver much needed housing within the Borough since they obtained planning permission in 2012.

The Housing Land Availability Statement states that 460 dwellings are due to be delivered within Standen and Barrow in the next 5 years (180 and 280 dwellings respectively). It is our view that this is unlikely particularly given the extent of work required to implement and facilitate these planning permissions

because the reserved matters applications for each are still pending determination. It is our view that the number of dwellings envisaged to be delivered will be substantially less.

We have significant concerns with the Council's approach of simply rolling forward these sites without examining what the consequences of their non-delivery to date is and will continue to be. This coupled with an overall identified shortfall of 831 dwellings within the Plan period to date is significant, and is likely to have increased between October 2016 and April 2017, due to the lack of delivery within the Strategic Site at Standen and Land to the south and west of Barrow, further exasperating the problem. There is no certainty how the Council will seek to effectively address and "catch-up" this shortfall without the need for further allocations within Principal sustainable settlements, such as Longridge.

We consider that to ensure the housing needs for the Borough over the Plan period are met, further land release and land allocations within the Principal settlements is required.

Affordable Housing Provision

No reference has been made within the HED DPD to affordable housing provision. It was previously identified within the Issues and Options DPD that there is a requirement of 1,680 affordable dwellings over the Plan period. The Housing Land Availability Statement states that there have been 470 affordable housing completions (2008 – 2016), with a further 815 affordable dwellings with planning permission which have not yet commenced.

We are concerned that this issue has not been identified or addressed as part of the HED DPD consultation. Additionally, we consider there to be an overreliance on the delivery of extant planning permissions, which may not deliver until later on in the Plan period, and will not meet the identified need and significant shortfall in affordable housing experienced to date.

The delivery of affordable housing will also be exacerbated by changes to national planning policy provision relating to affordable housing, which will have an impact on the amount of affordable housing coming forward within the Borough in the future.

Residual Housing Requirement – Longridge

The HED DPD identifies a residual housing requirement within 3 settlements within the Borough - Longridge (25 dwellings), Mellor (17 dwellings) and Wilpshire (34 dwellings). However, the HED DPD only seeks to allocate land within Mellor and Wilpshire to meet the residual housing requirements within these settlements.

The HED DPD does not allocate any sites within the Plan period in Longridge because planning permission has recently been granted for additional dwellings within the settlement. The Council considers that any additional needs within the Plan period are likely to be met from windfall, redevelopment opportunities and conversions. However, there is no certainty that these dwellings will be delivered, and it is considered that the justification provided by the Council is insufficient.

For Longridge, the Housing Land Availability Schedule states that the number of completions and extant permissions equated to 935 dwellings, against the Core Strategy adjusted requirement of 960 dwellings, with windfall is expected to address any outstanding needs in the Plan period. The number of dwellings delivered through windfall within Longridge to date has been largely inconsistent to date with between 6 – 13 dwellings between 2008 – 2014, and 3 – 16 dwellings between 2014 – 2016.

It is our Client's view that the Council's identified requirement within each settlement should be treated as a minimum rather than a maximum figure and that further housing allocations within Longridge are required. These allocations will help to provide greater certainty that the Core Strategy is deliverable and sufficiently flexible to meet the housing requirements of the Borough. Development within Longridge should be encouraged.

Settlement Boundary – Longridge

It is noted that the HED DPD is not consulting on the Core Strategy Proposals Map on this occasion. The Council has resolved to adopt the draft Proposals Map for development management purposes. It is noted that no public consultation has been undertaken on this decision prior to its adoption by the Council for development management purposes, nor has it been tested for soundness.

Our Client is concerned with the settlement boundary which the Council is seeking to utilise. As drafted, it fails to take account of the actual approved application site boundary (Ref: 013-008- P001b Rev F). This issue was identified within our original representation to the Issues and Options Paper in October 2016 but has not been addressed by the Council as part of the modifications to the Proposals Map.

As drafted, this approach to defining settlement boundaries is contrary to the Council's "Settlement Boundary Definition Topic Paper" (March 2016) which states that a settlement boundary should "*include all developed and undeveloped areas of existing planning consents relating to the settlement*" (Criteria 4).

The settlement boundary plan for Longridge should therefore be amended to reflect the full extent of the approved planning application boundary as has been done to reflect other planning permissions within the Borough. This is to ensure that the Proposals Map is up-to-date and reflective of all recent planning permissions and their boundaries.

Conclusions

We have a number of concerns with the HED DPD as drafted, and are disappointed that the Council has failed to consider the issues that we have previously identified within our representations to the Issues and Options DPD.

We do not consider that the HED DPD as drafted is sound and object to the document. It has not been positively prepared, justified or consistent with national policy. It is not informed by a sound evidence base, because the updated SHMA has still not been prepared and published, and the Council has not confirmed when it will be undertaking a review of the housing requirements, which is required by the Core Strategy.

It is clear that the market and affordable housing needs within the Borough are not being met, with substantial slippage from large scale strategic sites and permissions. These sites are failing to deliver the much-needed housing that the Borough needs. This coupled with the Council's approach of treating the housing requirement of 5,600 dwellings as a maximum rather than a minimum raises further concerns.

We trust you will take these comments into consideration and we would like to be kept informed of any future consultations and advised of its submission to the Secretary of State for Examination.

We also wish to participate within the HED DPD Examination Hearing Sessions. We consider this to be necessary because we have a number of concerns as identified above, which have not been addressed to date, and will result in the HED DPD as drafted, being found to be unsound.

Yours sincerely,



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 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

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.

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)

Vincent Ryan (Barton Willmore) on behalf of Barratt Homes

Q3

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

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

Various - see attached letter

Paragraph No.

Variouys

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
Effective

Consistent with national policy
Positively prepared

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.*

Please see attached letter

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.*

Please see attached letter

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

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.*

Please see attached letter

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.*

Please see attached letter

Q12 Date of completion: 30 / 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