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For official use	Ref. No.
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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 your comments further.

Name	[Redacted]
Name of Organisation (if you are responding on behalf of an organisation)	[Redacted]
Database Reference number (if you have one)	[Redacted]
Address	[Redacted]
Post Code	[Redacted]
Email Address	[Redacted]
Phone number	[Redacted]

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)

MRS C HUSSEY

Q3

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

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

POLICY HAL + SETTLEMENT BOUNDARIES

Paragraph No.

Q4

As a consequence do you consider the HED DPD is:

i) Legally compliant

Yes

No

ii) Sound *

* 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

Consistent with national policy

Effective

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.

SEE ATTACHED STATEMENT

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 STATEMENT.

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.*

N/A


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.*

SEE ATTACHED STATEMENT.

Q12 Date of completion: 08/06/2017

Q13 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

OBJECTION TO POLICY HAL

1. It is a requirement of the emerging DPD that it is able to meet in full the housing, employment and other identified needs of the Borough during the plan period. This needs to be achieved through its policies and particularly its land use allocations, including settlement boundaries. At this stage we believe that the approach taken by the Council is unsound, as it will not be effective in delivering the right amount of development.
2. In the case of residential development, which makes up the largest likely land use allocation, the Council appears to believe that meeting only the minimum housing requirements set out in the Core Strategy is a correct way to plan for the future development of the Borough. This is evidenced by the fact that the Council seeks only to identify those sites for which planning permission has been granted and which notionally would meet the minimum requirements, if all sites were developed entirely as planned. It is also clear from the fact that the Council is seeking new allocations in only a very small number of settlements, on the basis that these settlements still have a 'residual requirement', based on figures in the Core Strategy. Of course it remains clear that the residual requirement is the shortfall in numbers to meet the minimum requirements. It is certainly not a ceiling; indeed it is quite the opposite. Core Strategy policy sets the housing requirement as a minimum in order to ensure that additional development over and above the minimum is encouraged and is a sensible way to ensure that minimum requirements are exceeded.
3. It is clear from past evidence that approved housing schemes will not always deliver any or all of the housing anticipated in the expected timeframe and that much can change over the lifetime of the plan. Unless all approved housing sites deliver precisely as anticipated, it is clear that the policies of the DPD will fail to deliver the Core Strategy housing requirement. Having no alternative strategy in place, through additional or reserve allocations in the emerging DPD is therefore plainly inappropriate and would render the plan unsound in our opinion.
4. In terms of the adopted Core Strategy document, it is noted that Mellor is one of the nine Tier 1 villages considered to be the more sustainable rural settlements in the Borough (Key Statement DS1). Whilst the land to the rear of 86 Mellor Brow (which this representation relates to) lies outside its settlement boundary and is therefore designated as Open Countryside, the site is well related to, and indeed clearly functions as part of the settlement of Mellor. Being a tier 1 settlement, it is clear that the residual housing requirement in this location should be considered.
5. As set out in the adopted Core Strategy, the residual number of residential units to be provided in Mellor at the end of March 2014 is 18. However, the HEDDPD notes that the Council undertakes regular monitoring of housing land provision in terms of overall provision and its spatial distribution. It also notes that the up to date housing monitoring at 30th September 2016 shows that there remains a residual requirement in Mellor for 17 dwellings.
6. The document subsequently goes on to note that Mellor is constrained in part by Green Belt and there are fewer opportunities for windfall development and specific sites to be allocated through

the plan making process. The document proposes an allocation on land off Mellor Lane (adjacent to Weavers Fold), Mellor (Policy HAL1). The site is 0.4ha in size.

7. In this respect, the site is recognised as likely being too small to deliver the residual requirement, as it would lead to an unacceptable high density development in this location. It is acknowledged that if this is the case, then the remaining requirement for the settlement will need to be met through windfall development. The site subject of this objection would make an important contribution to this residual requirement, and therefore some of the residual housing requirement should be considered in this location. It is not constrained by Green Belt, has a safe and suitable access and is located in close proximity to Mellor's settlement boundary.
8. Moreover, Paragraph 55 of the National Planning Policy Framework (NPPF) states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. This site is close to and functions as part of the village of Mellor and is not isolated or remote from other built form. The site is close to a variety of services within Mellor and, in that regard, is considered to be a sustainable location in principle for development.
9. It is therefore intended that the site would serve to meet the residual housing need in Mellor, as identified in the adopted Core Strategy and still identified in the emerging HEDDPD, is consistent with the Development Plan, and would also be consistent with the NPPF guidance on creating sustainable patterns of development.
10. The flaws in the Council's approach and the efforts being made to "do the bare minimum" and to largely seek to disregard National Planning Policy Framework requirements in Paragraph 47 to "boost significantly the supply of housing" are evident across the published document. No reference is made to the fact that the housing requirements are set as a minimum, NOT a maximum or a ceiling. Reading the document one would assume that the purpose is to complete a paper exercise in meeting a mathematically derived target and to then prevent all further development. This is the antithesis of what the Government advocates through NPPF and Practice Guidance.
11. It is therefore considered that the local plan is **unsound** on the basis that it is not "**positively prepared**" in that it is not demonstrated that it is prepared based on a strategy which will meet needs, consistent with achieving sustainable development.
12. In order to rectify this situation, it is requested that additional residential allocations are made on the periphery of Mellor, such as the land to the rear of 86 Mellor Brow, appended to this document. Such allocations should then be reflected within Policy HAL and the settlement boundaries on the **Proposals Map**.

86a Mellor Brow
Mellor
Blackburn
BB2 7EX



OS MasterMap 12502500710000
scale
08 March 2017, 10:30
MDF-00005726
www.malcolmjughes.co.uk
1:1250 scale print at A3, Centre:
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