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For official use		Ref. No.
		Ack'd

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
- 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)

ANDREW BILLINGTON

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:

	Yes	No
i) Legally compliant	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	Consistent with national policy	<input 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 STATEMENT

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.*

TO PROVIDE FURTHER EVIDENCE.

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

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

OBJECTION TO POLICY HAL

1. PWA Planning is retained to act on behalf of Mr A. Billington, being the owner of land within the area referred to within this submission and in the Ribble Valley Council area, and to provide comments to the Publication Version of the Housing and Economic Development DPD (HEDDPD), together with the associated documents.
2. 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.
3. 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.
4. 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.
5. 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.
6. For this reason it is considered that suitable sites within or on the periphery of all settlements should be considered for identification within the emerging HEDDPD. It is therefore inappropriate

to restrict the call for sites (which is being undertaken concurrently with the DPD consultation) to the settlements of Mellor and Wilpshire.

7. We have therefore identified additional land (see attached plan) which we believe ought to be included within the settlement boundary of Longridge in order to assist in meeting future needs within the settlement in particular and the Borough more generally. Despite the suggestion that sites are only being sought in those limited settlements, we believe this to be a flawed approach.
8. A similar approach is apparent in the definition of a number of draft settlement boundaries. The original boundaries were set in the 1998 Districtwide Local Plan (now nearly 20 years old). A topic paper¹ has previously been produced which gives background information. It does not appear that the Council has looked closely at the true present day boundaries of the settlements with a view to encompassing all land uses which have greater affinity with the urban functions that predominate in a settlement, e.g. residential, commercial, industrial, schools, parks etc. The topic paper states that the first stage of boundary review has been to *“establish the boundaries as they are at present ... taking the current boundaries established in 1998 as the starting and including all current planning permissions granted since 1998 that have been built out or are currently awaiting a start or completion”*.
9. It seems that in some areas, the settlement boundaries have not been critically reviewed against the criteria set out in the topic paper (section 4 – criteria for definition of a settlement boundary) and that there remain a number of anomalies. Simple aerial imagery indicates that many of the settlement boundaries do not follow logical boundaries and certainly do not *“include all properties physically linked to the main (built) part of the settlement, except those, such as operating farms, that principally functionally relate to the surrounding countryside”*.
10. In particular, the area to the north east of the current settlement boundary of Longridge is poorly defined and currently excludes large areas of land which is clearly and functionally part of the settlement. In particular, we have identified areas we consider ought properly to be included within the settlement boundary. The plan attached includes the area which includes our clients building and which adjoins a small area of parkland, immediately adjacent to the settlement boundary. The land is clearly urban in character and is physically linked to the main part of the settlement. Managed play areas and parkland is also an urban feature and this should be within the settlement as is the case in most other circumstances. Furthermore, it encompasses a further property marking the end of the Longridge existing settlement boundary. It is therefore requested that the land edged in red on the first plan attached, be included in the settlement boundary of Longridge.
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 Longridge, such as the land at The Stables, Chaigley Road and surrounding this

¹ Interim Settlement Boundary Definition Topic Paper (March 2016)

**Regulation 19 Publication Version of the HEDDPD
Representations on behalf of Mr A. Billington
Land at The Stables, Chaigley Road**



area, appended to this document. Such allocations should then be reflected within Policy HAL and the settlement boundaries on the Proposals Map.

