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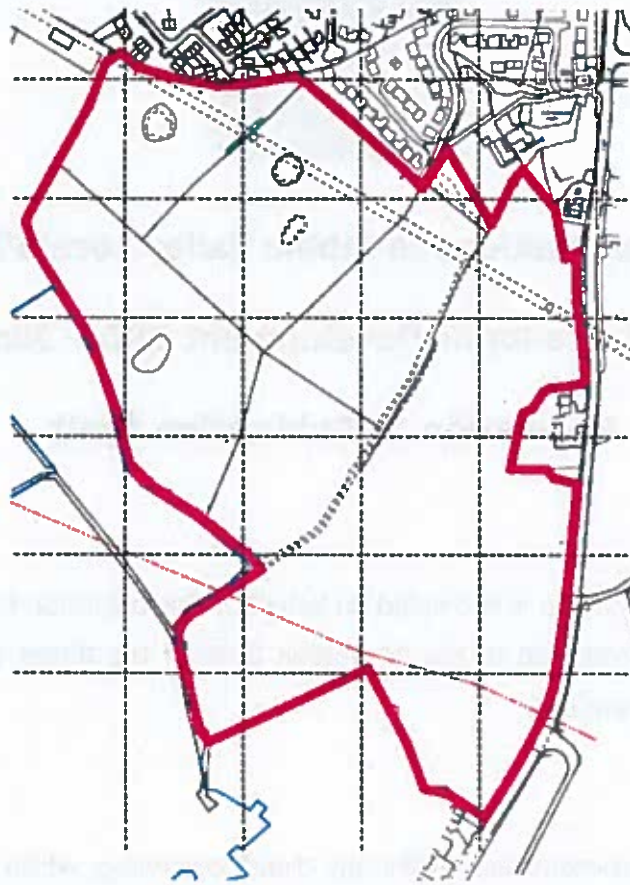
Grimbaldeston Farm Trustees and S and N Forshaw



**Representations to Ribble Valley Local Plan:  
Housing & Economic Development DPD – June 2017  
Regulation 19 Publication Draft**

1. This written representation is submitted on behalf of Grimbaldeston Farm Trustees and S and N Forshaw in response to the Publication Draft of the Ribble Valley Housing and Economic Development DPD.
2. The representation concerns land within my client's ownership, which is currently subject to a planning appeal and application for residential development with a small element of retail use. The northern part of the site was shown as Proposed Employment Allocation Option Site 2 – Land at Grimbaldeston Farm, Longridge in the Regulation 18 consultation.
3. My client has been seeking development of the land in question for a number of years and fully intend to progress with plans for the disposal of the site for development subject to achieving planning consent, which is pending.
4. Since the Regulation 18 consultation, an application for the residential development of the site has been deferred and delegated for approval by the Planning Committee. As such, the site should be considered appropriately within the Local Plan and included within the defined settlement boundary of Longridge on the updated Proposals Map. The area subject

to the application is shown below, although not all of the site is subject to built development.





## **Representations to Ribble Valley Local Plan:**

### **Housing and Economic Development DPD – October 2016**

#### **Regulation 18 Issues and Options Consultation Response**

1. This written representation is submitted on behalf of JWPC Ltd in response to the Issues and Options Consultation of the Ribble Valley Housing and Economic Development DPD. This document is submitted along with several more site-specific representations on behalf of a number of our clients.
2. We object to the proposed consultation process described in the published document, which seeks to provide limits to the potential sites that can be submitted for consideration, with only three settlements shown as potential areas where allocations can be made. We fundamentally disagree with the approach taken here in seeking only to consider potential site allocations where there is a residual housing requirement in the Borough for a settlement (beyond those either constructed or largely with extant planning permissions). Were a Development Plan Document to be adopted in this way, it would merely represent a snapshot in time against current extant permissions rather than a key part of a long term Development Plan which seeks to boost significantly the supply of housing in compliance with the National Planning Policy Framework (NPPF).
3. The Council's adopted Core Strategy, which forms the first document in the new Development Plan, does provide for a minimum number of new houses across the

Borough over the Plan period, with specific policy defining where new development should be directed, principally to the three towns of Clitheroe, Whalley and Longridge, with additional development at Tier One and Tier Two village settlements. Although the Core Strategy includes a snapshot table at 4.1 of the residual number of houses that may be needed to meet this minimum requirement beyond existing current commitments, this table does not form part of the policy itself, and there would likely be a significant shortfall in delivery if plans are not put in place for a wider range of housing sites to come forward during the plan period, therefore failing to provide a robust policy approach for housing and economic development.

4. One of the key roles of the Local Plan is to meet the full objectively assessed need for new housing. However, beyond this, it also has a role to manage future development proposals and provide for sustainable growth in terms of the economic, environmental and social future of the Borough. The proposal set out in this Housing and Economic Development DPD simply looks to allocate a few small sites for development to meet a minimum figure, rather than taking a detailed assessment of each sustainable location and identifying suitable, sensible and defensible settlement boundaries for these settlements to allow for natural sustainable housing growth over the Plan period.
  
5. A key concern in this regard is whether all existing extant planning permissions might come forward to deliver the minimum number of houses in the best locations during the Plan Period. For example, the significant majority of new dwellings intended to be provided across the villages of the Borough is taken up by a significant planning approval granted on appeal at Barrow for over 500 houses. The presence of this application was taken by the Council as an alternative to providing sustainable growth at other settlements in the Borough, and whilst this approach was not fully supported by the Inspector, it was not found to be an unsound approach. That said, this application is due to expire in the coming months and unless full Reserved Matters are submitted by February 2017, questions should be raised over the deliverability of the site as a new housing development and its function in providing sustainable natural growth to Barrow, which has already seen several other smaller sites successfully developed in the past few years, over and above growth at other settlements. Should

the consent be retained as valid, consideration should still be given to allowing future growth at the villages consistent with the Policies in the Core Strategy.

6. The Core Strategy itself provides an overall target and residual amount for some settlements, but by effectively reverse-engineering housing numbers across each village, the Core Strategy has provided no alternative should the delivery of housing not be forthcoming on larger sites, resulting in further shortfall in delivery. It is therefore the role of this Development Plan Document to adequately and accurately plan for potential future growth in all the identified sustainable settlements, albeit of an appropriate scale in compliance with the policy in the Core Strategy itself.

#### **Monitoring to Deliver**

7. Paragraph 2.5 of the main consultation document states that the Housing and Economic Development DPD will be subject to a monitoring process to ensure its content is addressing the aims and objectives of the plan. This is taken from Paragraph 1.7 of the Core Strategy, which also mentions specifically that the housing requirement of the plan has been identified for review as a matter of Council policy within 5 years of the date of adoption. As the Core Strategy was adopted in December 2014, by the time the Housing and Economic Development DPD is submitted to the Secretary of State, almost half of this time will be gone. It is important therefore that the DPD itself is made to some degree future proof by the implementation of an adequate monitoring strategy. In order to achieve this, the DPD should consider alternative ways of securing planning consents for new housing in instances where the housing requirement is not being built. It is imperative therefore that the Settlement Boundaries are defined as such that they allow for growth in addition to that proposed to meet the residual amount up to the minimum number during the Plan Period.

#### **Settlement Boundaries**

8. The Settlement Boundary Definition Topic Paper dated March 2016 outlines that the current draft Settlement Boundaries will be updated with future allocations and after consideration of each settlement assessed against the topic paper.

9. Section 3.1 of the Topic Paper states that there is a need to draw settlement boundaries around those settlements that could sustain, to varying degrees, some further growth to ensure that new development is genuinely physically linked to them and to prevent sprawl.
  
10. Policy DMG2 of the adopted Core Strategy states that development proposals in the principle settlements of Clitheroe, Longridge and Whalley and the Tier 1 villages should consolidate, expand or round-off development so that it is closely related to the main built up areas, ensuring this is appropriate to the scale of, and in keeping with, the existing settlement. It is important therefore that the settlement boundaries allow for such development to come forward during the Plan Period, to meet at least the minimum level of housing detailed in the Core Strategy and for contingencies.
  
11. The Council clarify that the definition of a settlement in the old Local Plan, carried forward in the Core Strategy Glossary, is to be retained. This refers to settlements of at least 20 dwellings and local services, with section 3.1 of the Topic Paper stating that settlements smaller than this are not considered to be large enough or to contain enough facilities to allow for growth. In effect, only those villages identified as sustainable in the settlement hierarchy will be suitable areas for growth and will be given defined settlement boundaries. We support this approach, and the general outcome. However, there is a clear area where the Council's definition is met, but a settlement boundary has not been defined to the relevant area. This area is at Barker Lane to the northern end of Blackburn on the Borough boundary. We refer to this specifically in a separate representation.
  
12. Section 4 of the Topic Paper provides criteria for the definition of a settlement boundary, through six bullet pointed considerations. We support the majority of these criteria, with the exception of bullet three and the further clarification of bullet six. The inclusion of bullet 3 and the clarification of bullet 6 would appear to conflict with Policy DMG2, which specifically states that development should round-off development. The notion that this would predicate the site allocations process implies

that new development will only come forward following site allocations made in the DPD.

13. Settlement boundaries defined on this basis would serve to significantly and artificially limit future development unless site allocation is made. We consider such an approach would be inconsistent with national policy to significantly boost housing supply and Policy DMG2 and would therefore be an unsound approach.
14. We are aware of several specific instances where a settlement boundary, previously drawn, failed to consider the functionality of the houses in or on the edge of a particular village and where good potential development sites would be prevented from coming forward to deliver sustainable growth and secure the future of these villages as such a consideration has not been made. The Plan should not simply represent a snapshot in time, but should be an active and positively planned town planning document.
15. Alongside this submission we have provided site-specific references to particular areas we consider should be redefined.

### **Wilpshire**

16. Wilpshire is a settlement that is proposed to have allocations made within the DPD, and is in fact the area with the largest residual figure. This may relate to the fact that the settlement is constrained somewhat by topography and Green Belt designation to much of the settlement boundary, so few sites have come forward through the Development Management process, unlike in other settlements across the Borough. Due to the tight constraint of Green Belt and limited number of potential infill plots in the settlement, we would propose that a specific Green Belt review is undertaken on land adjacent to the settlement boundary of Wilpshire to determine whether land is suitable for development. Land previously defined as Open Land and now proposed as a potential development site, was effectively safeguarded in the old plan, subject

to review of a new Plan. Significant time has passed such that a full review and assessment of all land around the settlement should be made in conjunction with this.

The settlement is situated in a rural area and is surrounded by agricultural land. The settlement is situated in a rural area and is surrounded by agricultural land. The settlement is situated in a rural area and is surrounded by agricultural land.

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## **Representations to Ribble Valley Local Plan:**

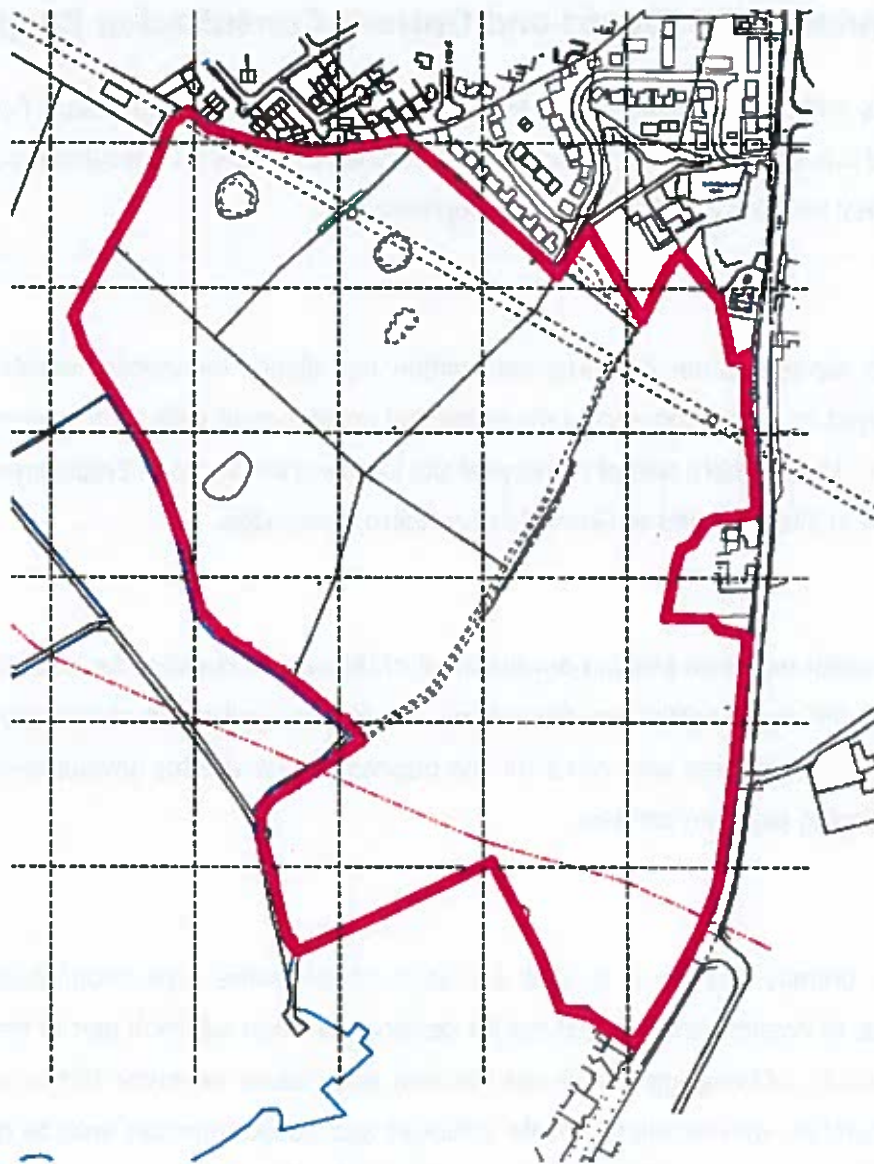
### **Housing and Economic Development DPD – October 2016**

#### **Regulation 18 Issues and Options Consultation Response**

1. This written representation is submitted on behalf of Grimbaldeston Farm Trustees and S and N Forshaw in response to the Issues and Options Consultation of the Ribble Valley Housing and Economic Development DPD.
2. The representation concerns land within my client's ownership, which is currently subject to a planning appeal for residential development with a small element of retail use. The northern part of the appeal site is shown as Proposed Employment Allocation Option Site 2 – Land at Grimbaldeston Farm, Longridge.
3. My client has been seeking development of the land in question for a number of years, from initial pre-application discussions, through an application and to appeal and fully intend to progress with plans for the disposal of the site for development subject to achieving planning consent.
4. Our primary position is to seek allocation of the entire application/appeal site Land West of Preston Road, Longridge for development that will form part of the settlement boundary of Longridge as we see the area as a natural extension of the urban area of Longridge, with excellent private vehicular and public transport links to the centre of the town and to employment areas to the south. We also recognise however that the land in question could also be considered suitable for a larger amount of employment

beyond the small scale local shopping facilities proposed in the planning application and appeal. That said, there are parts of the red edge site which may be unsuited to residential use, but where there may be scope for further employment /commercial use. The area proposed for employment use in the Issues and Options document is however most well suited for residential use.

5. We seek extension of the settlement boundary to accommodate development within the red edge plan below, to accommodate residential development with potential for an element of employment use.



*Location Plan for Application/Appeal – Propose Allocation*

6. In order to define this area within the Local Plan as a residential and potential employment area, we request discussion with officers to provide the relevant information to inform the decision in conjunction with the landowners.





**Representations to Ribble Valley Local Plan:  
Housing and Economic Development DPD – October 2016  
Regulation 18 Issues and Options Consultation Response**

1. This written representation is submitted on behalf of Mr Lee Wallbank in response to the Issues and Options Consultation of the Ribble Valley Housing and Economic Development DPD. The comments concern the proposed designation of land that functions as part of the urban area of Blackburn but forms part of the Ribble Valley District.



*Figure 1 – Aerial view of development on Barker Lane*

2. The area in question, which includes my client's property, is currently designated within the Green Belt, a situation which we find incongruous with the physical development existing and more recently proposed within Blackburn with Darwen Borough. Figure 1 shows the existing physical development.
3. It has become clear from recent correspondence with Planning Officer's and a recent planning application that the area at Barker Lane is considered to be rural in nature and remote from the village of Mellor. However, this position ignores the fact that the area would meet the criteria detailed in the Settlement Boundary Definition Topic Paper as the properties are physically linked to the main built part of Blackburn and are well related to the settlement. The 25 or so residential properties and car sales garage at Barker Lane where it meets the District boundary should be recognised as part of an urban area, albeit one in the neighbouring district. The District Boundary itself is not a physical boundary to the urban area and the houses around Barker Lane should therefore be taken out of the Green Belt to reflect their position as dwellings related to the urban settlement of Blackburn.
4. The plan at Figure 2 below is taken from the Blackburn with Darwen Borough Local Plan Part 2 and shows the position of the site in very close proximity to the built up area of Blackburn. The black line represents the borough boundary, with the land on Lammack Road within Blackburn with Darwen district forming part of the urban area within the Urban Boundary. In addition to this, large areas of land either side of Lammack Road are allocated by Policy 16/2 of the Local Plan and also fall within the Urban Boundary of Blackburn. Policy 16/2 is a Site Allocation for New Residential Development termed the 'North Blackburn Development Site'. This proposal allocates the land for 450 new houses to be developed. This specific site allocation also includes proposals for a new primary school on the site to serve the development.
5. The Green Belt designation washing over this section of Barker Lane, which is around 25 houses and the car sales business, provides for an unrealistic policy notation of the development that currently exists and its position on the edge of Blackburn, within walking distance of local facilities.

6. We seek removal of the Green Belt designation for this area to be drawn around the residential curtilage of the existing properties in accordance with the Settlement Boundary Definition Topic Paper.

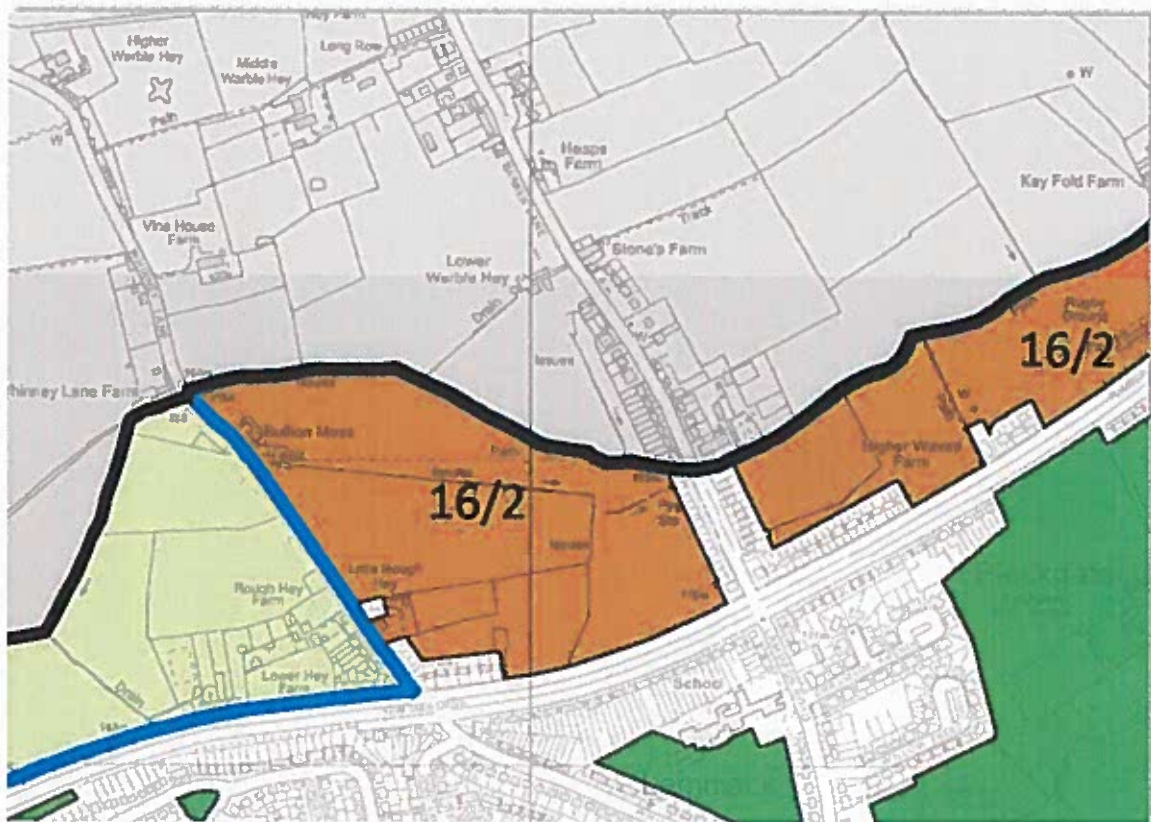


Figure 2 – Extract from Blackburn with Darwen Local Plan Part 2

