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9 June 2017

Dear Sirs

## **HOUSING AND ECONOMIC DEVELOPMENT DPD REGULATION 19 CONSULTATION**

We write on behalf of Miller Homes in response to the Council's consultation on the Publication Draft (Regulation 19) Housing and Economic Development (HED) DPD published in April 2017.

Miller Homes is an established provider of housing in the Borough with a strong track record of delivery of existing schemes in Clitheroe and Longridge. Reflective of their success and the company's aspiration to develop further in the locality, Miller Homes has an ongoing interest in land at Wilshire which we are pleased to note is a proposed draft housing allocation (Ref: HAL2) in the HED DPD.

Understandably, Miller Homes is keen to see this site come forward, supported by a robust and justified policy framework and it is against this context that the following comments are submitted. We have also reiterated these comments on the requisite form (copy enclosed).

### **Housing Requirement**

#### Background

Key Statement H1 (Housing Provision) of the adopted Core Strategy (December 2014) makes provision for the delivery of 5,600 dwellings in the period 2008 to 2028, with a target of 'at least' 280 dwellings per annum. It also states that the overall housing requirement will be the subject of a formal review within five years from adoption of the plan. Paragraph 6.4 of the supporting justification confirms that these figures '*will be treated as a minimum target*' unless otherwise determined.

Key Statement DS1 (Development Strategy) identifies the proposed spatial apportionment of housing across the Borough in meeting the plan target. Wilshire is identified as one of nine Tier 1 villages, deemed to be the most sustainable outside of the Borough's principal settlements. It is afforded an

allocation of 66 dwellings in the plan period.

At the time of adoption of the Core Strategy, it identified a residual requirement for 45 dwellings (based on housing data up to 31 March 2014) (para. 4.12).

The HED DPD suggests that the residual requirement has reduced to 34 dwellings, factoring in completions (12 dwellings) and extant permissions (20 dwellings) as at 30 September 2016. Whilst not expressly stated, proposed site allocation HAL2 is intended to meet the outstanding requirement for housing delivery in Wilpshire.

### Comments

Whilst it is not an objective of the HED DPD to reconsider the boroughwide housing allocation at the current time, the housing provisions of the DPD ought to reflect the fact that the boroughwide housing target is a minimum requirement (our emphasis), and applying this to the spatial distribution policy and requirement for Wilpshire, there is a need for at least 66 dwellings to be provided in the plan period. This is notwithstanding the outcome of any review of the figures due to be undertaken in the next two years and the potential effect of any change to the requirement on a settlement by settlement basis.

Therefore, reflective of the NPPF requirement for planning authorities to 'boost significantly' the supply of housing and inter alia, ensure an additional buffer of sites to provide a realistic prospect of achieving the planned supply and choice and competition in the market, the HED DPD should be making provision for additional housing to come forward on existing proposed sites and in alternative locations.

We have not sought to review the Council's latest reported housing land supply figures (as at 30 September 2016) in any detail, however, note that the Council has underdelivered against its annual plan requirement to date by some 831 dwellings (2008-mid 2016).

Whilst the rate of completions has significantly increased in more recent years and there are a number of consented schemes in the pipeline yet to start on site (totalling some 3,002 dwellings), when taken together with existing completions and the two additional site allocations are factored in, the Council's buffer to address potential non-delivery or under delivery of sites is extremely low and does not reflect the requirements of national guidance to plan positively to address housing need.

On this basis, the proposed HED DPD lacks flexibility and is not considered to be sound based on its ability to be effectively implemented alongside the Core Strategy in line with national guidance.

### **Implications for draft housing allocation HAL2**

Firstly, we would like to reaffirm our **support** for the Council's proposed allocation of this site overall, including the consequential amendments to the

proposals map that arise from this sites inclusion in the Wilpshire settlement boundary (see Map 4B).

However, we do consider that the policy wording needs to be updated to:

- a) Make clear the requirements for bringing forward development on the site (overall); and
- b) Establish the minimum quantum of development that ought to be delivered.

In this regard, we note that the explanatory text provided in the 'Approach to Plan Preparation' document published in support of the draft plan recognises the potential of the site to accommodate and deliver more than 34 dwellings in the plan period (see Site Attributes on Page 8).

Additionally, the Sustainability Appraisal (SA) undertaken on behalf of the Council in support of the HED DPD, confirms the extent to which housing delivery in this location would more than exceed sustainability appraisal objectives, particularly in social and economic terms.

Based on an approximate net developable area of 4.45 Ha (11 acres) and reflective of the need to address certain site constraints (most notably the presence of overhead power lines), the site has the capacity to deliver in the order of 120 to 140 dwellings in a carefully designed landscape setting. The enclosed plan (submitted previously) demonstrates the most developable areas of the site and how development might come forward albeit this currently illustrates a slightly higher level of development (in density terms) than would most likely ultimately come forward. We would welcome the opportunity to submit further details on the sites' overall deliverability in support of the allocation, in due course.

In the meantime, we encourage the Council to revisit the wording of draft Policy HAL in respect of HAL2, to ensure that it is positively prepared; that what is expected from the sites' allocation is clear; and, that the policy's subsequent implementation is effective in support of the overall aims and objectives of the adopted Core Strategy and approach to housing delivery across the Borough.

#### **Next steps**

Given the significance of this site in the draft HED DPD and need to ensure that its allocation is justified and robust, we request that the Council keeps us informed of further stages in the plan's preparation (in particular, Regulations 22 and 24) and that we are encouraged to attend any future examination hearings, mindful of Miller Homes' key role in delivery of this site.

Should you have any queries or require any further information at this stage, please do not hesitate to contact us.

We look forward to hearing from you further.

Yours faithfully



Enc: Site Plan  
Submission Form

cc: Miller Homes



**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.ribblevalley.gov.uk](http://www.ribblevalley.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.



Please use a separate form for each individual comment.

Q2

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

Miller Homes

Q3

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

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

Housing allocations - Ref: HAL2

Paragraph No.

Q4

As a consequence do you consider the HED DPD is:

- |                      | Yes                      | No                                  |
|----------------------|--------------------------|-------------------------------------|
| i) Legally compliant | <input 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 checked="" type="checkbox"/> | Consistent with national policy | <input checked="" type="checkbox"/> |
| Effective | <input checked="" 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 covering letter

(Comment continued on separate page)

**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 covering 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.*

Given the significance of this site in the draft HED DPD and need to ensure that its allocation is justified and robust, we request that the Council keeps us informed of further stages in the plan's preparation (in particular, Regulations 22 and 24) and that we are encouraged to attend any future examination hearings, mindful of Miller Homes' key role in delivery of this site.

**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:   9   /  June  /  2017 

**Q13** Signature



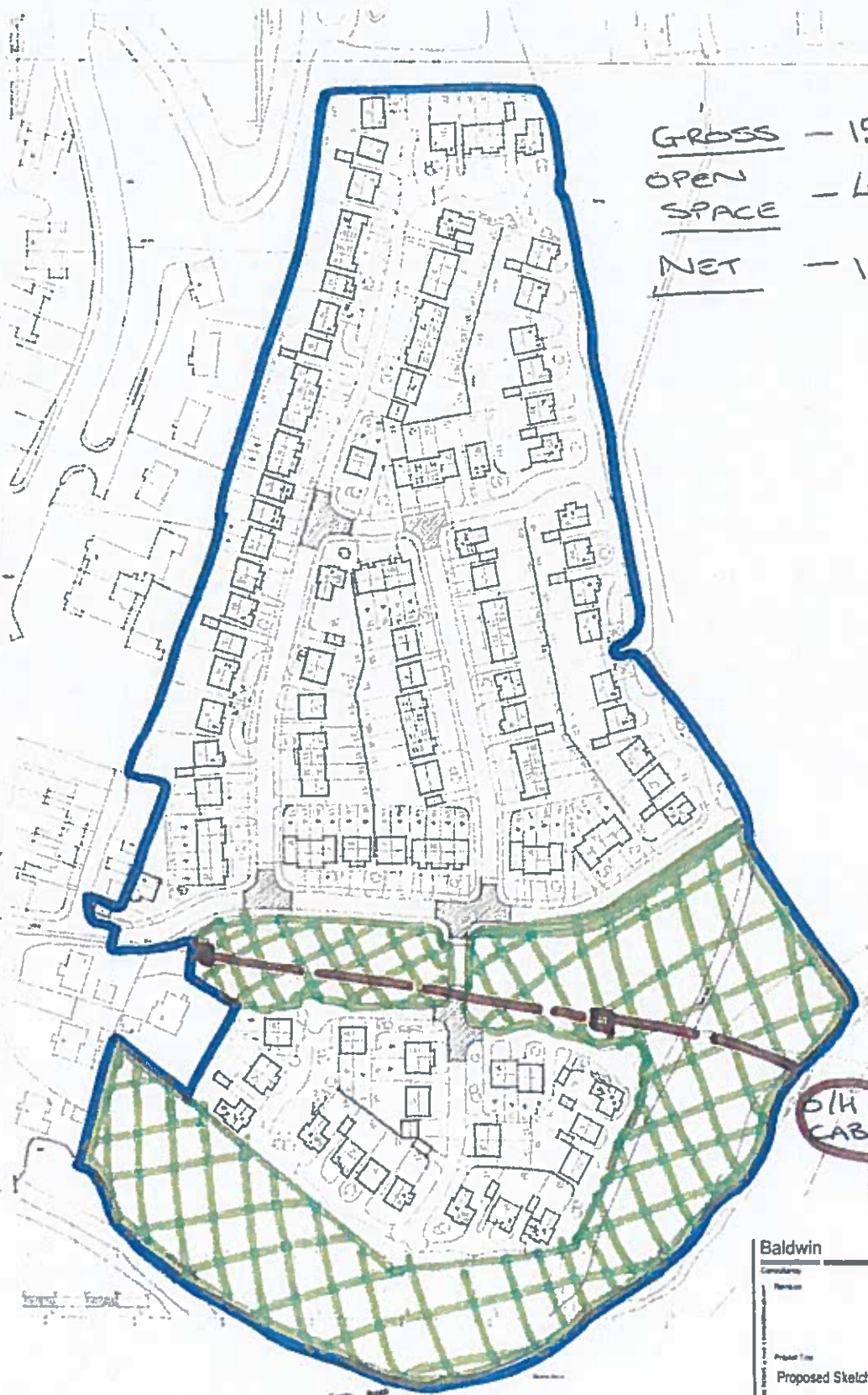
Thank you very much for taking the time to complete this comments form, your comments are very much appreciated.

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





GROSS — 15.5 ACRES  
OPEN SPACE — 4.5 ACRES  
NET — 11 ACRES



OH  
CABLES

Baldwin Design

Project Title  
Proposed Sketch Scheme

Address  
Land off Whalley Road,  
Wharfedale

Drawing  
Site Layout

Drawing No

Scale  
1:500

Date  
24.01.14

Page  
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Handwritten notes in the top left corner, possibly describing the object or its components.

Handwritten notes in the bottom left corner, including a small circle and a vertical line with markings.

