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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.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

[Redacted]	
[Redacted]	
[Redacted]	
[Redacted]	
[Redacted]	
[Redacted]	
[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)

Q3

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

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

Settlement Boundaries

Paragraph No.

Q4

As a consequence do you consider the HED DPD is:

- i) Legally compliant
- ii) Sound *

Yes

No

* 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 accompanying statement, which was previously submitted in relation to Regulation 18. The same statement is submitted on the basis we do not believe our comments/concerns have been given due and necessary consideration.

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 accompanying statement, which was previously submitted in relation to Regulation 18. The same statement is submitted on the basis we do not believe our comments/concerns have been given due and necessary consideration.

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.*

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.*

Please see accompanying statement.

Q12 Date of completion: 09 / 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



Ribble Saw Mill
Paley Road
Preston
PR1 8LT

01772 369 669
info@pwaplanning.co.uk
www.pwaplanning.co.uk

Ribble Valley Borough Council Housing and Economic Development DPD

**Town & Country Planning (Local Planning) (England) Regulations 2012
Regulation 18 : Issues and Option Consultation**

REPRESENTATIONS ON BEHALF OF REILLY DEVELOPMENTS

1. PWA Planning is retained to act on behalf of Reilly Developments, being the prospective owners of land within Barrow in the Ribble Valley Council area, and to provide comments to the Issues and Options draft of the Housing and Economic Development DPD (HEDDPD), together with the associated documents.
2. We have considered the details of the documents that have been published by the Council under **Regulation 18** of the Town and Country Planning (Local Planning) (England) Regulations 2012. We have the following comments and concerns / objections to the proposals as currently drafted.

Section 8. Issues and Options : Housing Options

3. 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.
4. 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.
5. 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.
6. The **"Background Information on Housing"** at Paragraph 10.5 and Issue 1 is predicated on the same fundamental flaw, i.e. which then work through into 'residual requirements' for individual settlements. We consider the flaws in this approach to revolve around the following points :-
 - (i) That it is appropriate to simply seek to meet the minimum housing requirement target set out in the Core Strategy. Core Strategy Key Statement H1 makes it clear that at least 280 dwellings per annum will be provided and more explicitly paragraph 6.4 states that **"these figures will be treated as a minimum target unless otherwise determined"**.

- (ii) That it is appropriate to disaggregate the overall housing requirement to the individual settlement level, in such specific terms that it results in the situation where most settlements have no land use allocations, as opposed to land which already has planning permission.
 - (iii) That it is appropriate to resist development in locations where the notional residual requirement is met by extant planning permissions, even in the circumstances where the global housing requirements may not have been met.
7. 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.
8. 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 Chatburn, Mellor and Wilpshire.
9. We have therefore identified additional land (see attached plan) which we believe ought to be included within the settlement boundary of **Barrow** 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 and hence we have also completed a call for sites pro-forma for this land.



RIBBLE VALLEY HOUSING AND ECONOMIC DEVELOPMENT
REGULATION 18 ISSUES AND OPTIONS
SUGGESTED SITE FOR CONSIDERATION AUGUST 2016

RVBC are holding a 'call for sites' for housing, employment and retail land purposes as part of a consultation on the forthcoming Housing and Economic Development DPD.

This form can be used to submit suggested housing sites, employment land sites and proposed retail sites to the Council.

If you wish to submit a site as a potential option for allocation as part of this process, please complete this form and provide a location plan which enables the site and its boundaries to be identified clearly. Gaps in providing information could cause delay in assessing your site and its possible inclusion in the Housing and Economic Development DPD site consideration process. If you wish to provide any supplementary information in support of your responses, please append it to this questionnaire.

Please do not submit sites which:

- Already have planning permission or are under construction as these are already accounted for in the plan making process.
- In relation to housing are located in settlements where the residual housing requirement has already been met. The call for housing sites relates only to those settlements where a residual requirement remains. These settlements are:
 - Chatburn
 - Mellor
 - Wilpshire

Please use a separate form for each site.

Information provided on this questionnaire will be made public as it will form part of the evidence base to the Local Development Framework. We will not publish personal address and contact information and will hold your information in accord with the requirements of the Data Protection Act. All information provided will be available to the Inspector appointed by the Secretary of State to hold the Examination in Public.

The suggestion of a site does not imply on the Council's part that it will agree that a site has potential for housing, employment or retail uses; or that planning permission would be forthcoming for housing, employment or retail uses; or that it will be allocated for development in any of the Council's Development Plan Documents.

Please return this completed form along with a site plan and any further supporting information no later than 5pm Friday 7th October 2016 to:

Reg. 18 Issues and Options Call for Sites Consultation
Regeneration and Housing
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

GENERAL INFORMATION	
What type of development are you suggesting the site could be developed for? E.g. housing, employment B1 – B8, retail	Residential
Site suggested by: (main contact if further details required)	Paul Walton - Director PWA Planning Ribble Saw Mill Paley Road Preston PR1 8LT 01772 369 669 paul.walton@pwaplanning.co.uk
What is your interest in the land?	Agent for the prospective purchaser
Details of site owner: (if different from above)	
Is the owner aware the site has been suggested in this call for sites consultation?	Yes
Location of site:	Land south of Whiteacre Lane, Barrow See attached plan
Site area (in hectares or sq metres)	
Current use of site	Paddock to rear of residential development

Is the site greenfield or previously developed?	Mostly greenfield
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Has planning permission ever been sought for development of the site?	Not known.
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OWNERSHIP MATTERS

Is the site in single or multiple ownership?	Single owner and interested developer.
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If multiple, how many owners?	
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Have all the owners expressed an intention sell the land for housing, employment or retail use?	Yes
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Is the land controlled by a developer who intends to develop the land?	Yes – Reilly Developments (developing land to the south at present)
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Are there any ransom strips, tenancies or operational requirements of landowners which would restrict development?	No
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VIABILITY MATTERS

<p>Has the economic viability of the site been assessed? If so, what was the outcome?</p>	<p>Sites to the south have proven viable and are being developed and this site would also be viable. An appraisal of the site was undertaken prior to a contract to purchase being agreed.</p>
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<p>Please explain why you consider the site to be economically viable (or not).</p>	
<p>Are there any abnormal costs/significant constraints that need to be overcome in developing this site?</p>	<p>No</p>
<p>How many developers would be involved in developing the site should planning permission be granted?</p>	<p>1</p>
<p>What would be a realistic timescale for developing the site</p>	<p>2017 - 2019</p>
<p>If this is a large site what would be a realistic projected build rate for the site? (e.g. estimated no. of dwellings per year if for housing or timescale from start to completion of phases of development)</p>	<p>20 per annum</p>

CAPACITY AND CONSTRAINT MATTERS

What is your estimate of the potential capacity of the site? (no. of dwellings/ overall m ² if employment land / m ² retail floorspace)	Care home provision currently being considered. 60 beds plus 20+ sheltered bungalow accommodation.
Are there any physical constraints which would restrict development of the site?	No
Has any work been undertaken to assess how these constraints might be overcome?	
Is there direct access to the site from the adjoining road network?	Yes – via land already owned by Reilly Developments
Are there any major issues regarding access to the site, and if so briefly what are they?	No
Are there any trees on site protected by Tree Preservation Orders?	No
Are there significant contamination issues/hazardous risks/pollution on the sites?	No
Is the site within an area at risk from flooding (flood Zone 2 or 3 as defined by the Environment Agency)?	No
Please explain why you think the site is a suitable location for development.	Sustainable location adjacent to the settlement and capable of accommodating the proposed type of development in a manner which would complement existing residential and associated uses.

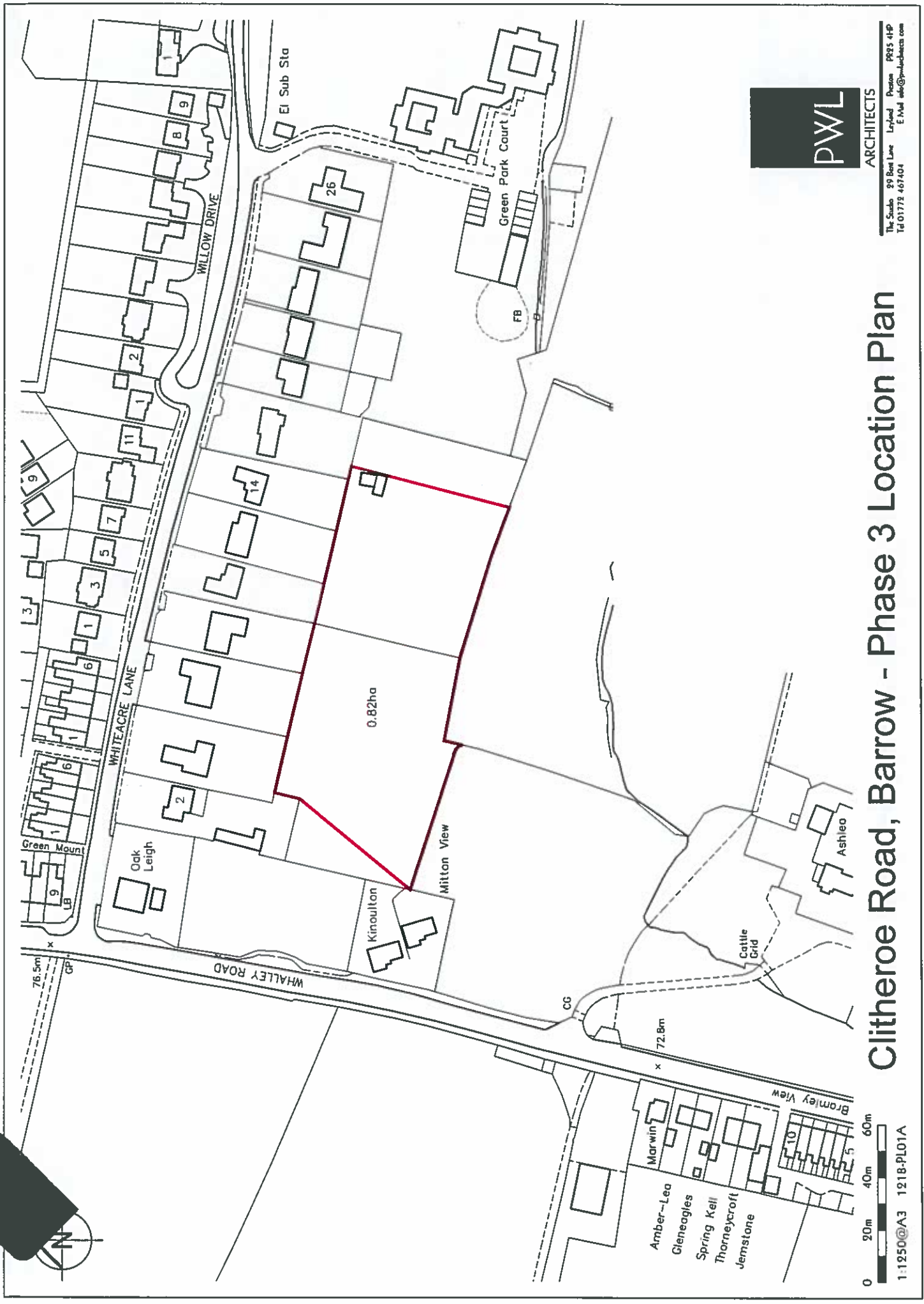
<p>If there are any other issues that you wish to raise in relation to this site, please do so here.</p>	
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Declaration

I understand that information provided on this form in response to this call for sites for sites, with the exception of name and address, could be made publicly available by Ribble Valley Borough Council in relation to production of the Housing and Economic Development DPD and evidence base for the LDF. Information will be made available to the Inspector for the purposes of the Examination in Public should he or she require it.

The information I have provided is accurate and true to the best of my knowledge.

Name (print)	[Redacted]
Signature	[Redacted]
Organisation	[Redacted]
Date	7 th October 2016



Clitheroe Road, Barrow - Phase 3 Location Plan



The Studio 29 Beech Lane Leyland Preston PR25 4HP
 Tel 01772 467504 E Mail info@pwlarchitects.com

0 20m 40m 60m
 1:1250@A3 1218-PL01A

