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Town Planning and Urban Design



HED DPD Submission
Forward Planning
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA

4 September 2017

LBA007/dc

Dear Sir/Madam

**Town and Country Planning (Local Planning) (England) Regulations 2012:
Submission to Secretary of State and Consultation on Identified Changes**

**Local Plan for Ribble Valley 2008-2028: Housing and Economic Development
– Development Plan Document (HED DPD)**

Thank you for notifying us of the above consultation following the submission of the Council's Housing and Economic Development (HED) Development Plan Document (HED DPD) to the Secretary of State.

We write to submit representations on the Submission Version of the HED DPD on behalf of our clients, Barrow Lands Company Limited and Gedlew Limited, who own land at Whalley Road, Barrow that is shown as a housing commitment in the HED DPD. This now has reserved matters approval for a total of 408 dwellings along with a central spine road and utilities corridor (3/2017/0140, 3/2017/0064 and 3/2017/0050). Works to the homes approved under reserved matters 3/2017/0064 has now commenced.

The scope of our representations is restricted, as requested, to the amendments being proposed to the HED DPD following the Regulation 19 stage.

Changes to the Proposals Map (PM5)

We are pleased to note following our objection at Regulation 19 stage that Identified Change PM5 withdraws and no longer identifies the allotments on our client's site as 'existing open space'.

We therefore support this change, which withdraws "Open Space site on western site of Barrow (included wholly within housing development west of Whalley Road, Barrow). See Map 4 in appendix 1 of this report" from the HED DPD.

Open Space - Policy OS1



We note the proposed change to Policy OS1 (DOC3), which we consider is an improvement to the wording of the Policy. We have no objection to the proposed change but do consider that the wording of Policy OS1 could be made more compliant with national planning policy (National Planning Policy Framework) if it was amended to read:

Development leading to the loss of open space of whatever type (identified on the Proposals Map), will only be permitted where:

- a) an assessment shows that the site is no longer required for or is demonstrably unsuitable for its original intended purpose;*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location readily accessible and convenient to users of the former open space area, including the possible improvement of existing facilities;*
- c) there is no viable or reasonably practicable means of re-using it for an alternative form of open space; and*
- d) the loss would be justified due to the social, economic or environmental benefits the development would bring to the community/area.*

Conclusion

Overall, we consider the HED DPD, as proposed to be amended to be 'sound' but some wording changes to Policy OS1 could enhance the soundness of the HED DPD.

We would ask to be notified about future stages of the HED DPD plan-making process and the examination of the Plan so we can then decide whether it is necessary to attend. At this stage, we consider it unlikely but reserve our position on this matter.

We would be grateful if the Council could forward these comments to the Secretary of State for consideration by the Inspector appointed to examine the HED DPD.

Yours sincerely

[Redacted signature block]

[Redacted name]

Partner

Email: [Redacted email address]