

**EXAMINATION OF THE RIBBLE VALLEY HOUSING AND  
ECONOMIC DEVELOPMENT, DEVELOPMENT PLAN DOCUMENT  
(HED DPD)  
INSPECTOR'S MAIN ISSUES AND QUESTIONS RESPONSE**

**ISSUE 1 – LEGAL COMPLIANCE**

7<sup>th</sup> December 2017

PWA\_17-371\_ISS1

## 1. INTRODUCTION

- 1.1. PWA is retained by Andrew Billington in respect of land at The Stables, Chaigley Road, Longridge, PR3 3TQ ('the site'). The site is currently the subject of an outline planning application for up to 15 no. self-build dwellings ('the proposed development') (planning application ref. 3/2017/1100).
- 1.2. It is a requirement of the emerging Housing and Economic Development, Development Plan Document (HED 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 sufficient development to meet the future needs of the borough. This is further supplemented by the under delivery of dwellings to meet the needs of Longridge as discussed below.
- 1.3. The statement responds to selected questions set out within Issue 1 of the Inspector's Main Issues and Questions. The responses should be read together with the comments previously provided on the publication version of the HED DPD.
- 1.4. This statement is intended to follow the format provided by the Inspector in his Main Issues and Questions document dated 2<sup>nd</sup> November 2017.

## 2. Issue 1: Legal Compliance

**Issue 1:** *Legal compliance - has consultation been carried out in accordance with the Statement of Community Involvement and the relevant Regulations; has the DPD been subject to sustainability appraisal; has a Habitats Regulation Screening Report been carried out and has the duty to cooperate been met?*

### Questions

a) Has the Plan been prepared in accordance with relevant legal requirements, including the Duty to Cooperate and the procedural requirements of the National Planning Policy Framework?

2.1. No comments to make.

b) Is the Plan in general conformity with the National Planning Policy Framework? Does it reflect the National Planning Policy Framework's presumption in favour of sustainable development?

2.2. No comments to make.

c) Is the Plan consistent with the Core Strategy and is it capable of meeting its objectives?

2.3. The Core Strategy has two strategic objectives directly related to housing, these are *'To increase the supply of affordable and decent homes in the borough to help meet identified needs'* and to *'Ensure a suitable proportion of housing meets local needs'*.

2.4. 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. This is further supplemented by the under delivery of dwellings to meet the needs of Longridge as discussed below.

2.5. 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.

2.6. 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 (see discussion in Issue 2 response in relation to Longridge) 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 or the relevant strategic objectives listed above. 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.

- 2.7. The details of the undersupply in Longridge are provided within Issues 2 – Housing, however, it is maintained that the settlement boundary is altered in order to accommodate further allocations to help meet the need for Longridge as provided within the Core Strategy plan period. Land at The Stables, Longridge would help contribute towards this requirement.

d) Are appropriate arrangements in place to ensure proper monitoring of the Plan?

- 2.8. No comments to make.

e) How have the Housing Needs Assessment and Economic Strategy which formed part of the Core Strategy evidence base informed this DPD?

- 2.9. No comments to make.