

For official use		Ref. No.
		Ack'd

Ribble Valley Housing and  
Economic Development –  
Development Plan Document  
(HED DPD)



Ribble Valley  
Borough Council  
www.ribblevalley.gov.uk

**Response Form**  
**Regulation 22**  
**Main Modifications Consultation**  
**1<sup>st</sup> March 2019 – 12<sup>th</sup> April 2019**

Before using this form to make any comments please ensure that you have read the Housing and Economic Development – Development Plan Document Main Modifications : Housing Allocations document and associated documents and the Response Form 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 link. 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 5pm on Friday 12<sup>th</sup> April 2019.

Please return paper copies marked 'HED DPD Main Modifications consultation' to Forward Planning Team, Ribble Valley Borough Council, Council Offices, Church Walk, Clitheroe, BB7 2RA. Alternatively you can email them to: [pmods22@ribblevalley.gov.uk](mailto:pmods22@ribblevalley.gov.uk)

## 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.

## 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 Main Modification to the HED DPD does this comment relate?

Modification number

See supporting statement.

Paragraph No.

See supporting statement.

Q4 Please indicate if the proposed change resolves any objection you have made at the previous Regulation 19 consultation stage of April – June 2017:

Yes

No

Not applicable

Q5 As a consequence do you consider the HED DPD is:

i) Legally compliant

Yes

ii) Sound \*

No

\* The considerations in relation to the HED DPD being sound are explained in the Guidance Notes

Q6 If you consider the HED DPD is unsound, is this because it is not... (please tick the appropriate box)

Justified

Consistent with national policy

Effective

Positively prepared

Q7

Please give details of why you consider that the HED DPD is not legally compliant or sound. Please be as precise as possible and ensure that your comments only relate to a specific proposed change. You do not need to repeat comments made at the previous consultation stages as these have already been forwarded to the Inspector for consideration as part of the Examination.

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 supporting statement.

**Q8** In relation to this proposed change, 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 Q6 above where this relates to soundness. Please restrict your answer to specific proposed changes.

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 supporting statement.

**Please note:** your comment should cover succinctly all the information, evidence, and supporting information necessary to support/justify the comment and the suggested change.

After this stage, further submissions will only be at the request of the Inspector, based on any matters and issues he identifies for Examination at any subsequent Examination in Public.

**Q9** **Participation at Examination is at the discretion of the Inspector but please indicate below if you wish to participate at the oral part of the examination in connection with these representations if there are further hearing days**

No, I do not wish to participate at the oral examination

Yes, I do wish to participate at the oral examination

**Q10** 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.*

See supporting statement.

**Q11** 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.

The publication of the Inspector's report following the Examination

The formal adoption of the HED DPD

**Q12** 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.*

See supporting statement.

**Q13** Date of completion:

1210412019

**Q14** Signature

[Redacted 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 VALLEY BOROUGH COUNCIL HOUSING AND ECONOMIC  
DEVELOPMENT – DEVELOPMENT PLAN DOCUMENT (HED DPD)  
CONSULTATION ON MAIN MODIFICATIONS - HOUSING**

April 2019

- 1.1. PWA Planning is retained by a range of landowners and developers within Ribble Valley. This response to the consultation on the main modifications represents a general response on behalf of all our clients and relates to what is considered to be an unsound approach in the selection of the sites that form part of the main modifications consultation. In this respect comments have previously been made to examination document POST 2.33, along with objections submitted by PWA Planning throughout the HED DPD plan writing procedure. This included objections raised at Regulation 18, 19 and 22, and within examination documents POST 3.10 and 3.18.
- 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. 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.
- 1.3. As set out within PWA's other submission documents to the examination, and without reiterating the well-rehearsed previously submitted comments, what is committed through planning permissions is not always delivered in full. In this respect, there continues to be minimal flexibility in the plan based on the anticipated housing trajectory within the Housing Position Paper (Examination Document POST 2.30).
- 1.4. The main modifications consultation appears to be a recognition of this, however, the sites being promoted were selected on the basis of meeting a 5-year housing supply. Through the progression of the examination in public, the Council appeared to change the focus of the need for the modifications, shifting from the need for flexibility within a 5-year housing supply, to the flexibility of the housing trajectory of the plan period.
- 1.5. In this respect, it is clear that the sites selected for the main modifications have been selected based on criteria to deliver housing within the 5-year period as oppose to sites that may be deliverable in the later parts of the plan. This has effectively ruled out sites that may be deliverable, but not in the short term. Likewise, the approach to select sites that have previously failed at the previous Call for Sites stage is also seemingly unsound. The previous call for sites focussed on a limited number of settlements, and not the wider borough area which as became apparent during the recent examination of the HED DPD may also require additional housing sites to meet the targets set within the Core Strategy. Through choosing to progress the main modifications in this manner the main modifications, but also the HED DPD, has not been positively prepared and is considered unsound.
- 1.6. In order to rectify this situation, a new Call for Sites should be undertaken to address previous concerns raised by PWA Planning submitted under the Regulation 19 consultation (that the plan is unsound as it has not been objectively assessed against reasonable alternatives, on the basis of the original consultation focussed on a limited number of settlements and not the wider borough, and that the main modifications are now being submitted under the guise of flexibility for the plan period housing numbers, and as such the methodology to select the rejected sites at the original Call for Sites Consultation, and Regulation 19, is unsound).