

STRATEGIC HOUSING MARKET ASSESSMENT

**SUMMARY OF REPRESENTATIONS RECEIVED ON
PRE-ADOPTION DRAFT**

**FORWARD PLANNING
DEVELOPMENT SERVICES
DECEMBER 2008**

Strategic Housing Market Assessment Summary of Representations **December 2008**

Involving Stakeholders in the consultation on the Strategic Housing Market Assessment

The Strategic Housing Market Assessment (SHMA) is a required element of the Local Development Framework (LDF) evidence base. The first SHMA report was published for comment in July 2008. During the consultation, letters informing that the SHMA was available for inspection were sent out to all Parish Councils and the document was available to view in the Local Development Framework Evidence Base section of the Council's website at www.ribblevalley.gov.uk. Copies of the SHMA were also made available for inspection at the Ribble Valley Borough Council's Offices in Clitheroe. The consultation took place over a six-week period from July- September 2008.

Outcome of the consultation

During consultation on the SHMA, the Council received formal representations from seven bodies. These were received by email and predominantly by returning the consultation response form that was available on the Council's website.

The bodies that formally responded to the SHMA consultation were as follows:

1. Gerald Hitman
2. Councillor Graham Sowter (RVBC Borough Councillor)
3. Bruce Dowles (Parish Councillor for Bolton-by-Bowland, Gisburn Forest and Sawley Parish Council.
4. Shona Thurlow (Town Clerk for Longridge Town Council)
5. Ian Woolstencroft (Town Clerk for Clitheroe Town Council)
6. Mary-Ann Renton (Clerk for Grindleton Parish Council)
7. Amanda Richardson (Elevate)

Detailed Representations

The following tables set out all the comments received during the SHMA consultation. Each response is set out in full. A summary of the main points of all of the representations received can be seen below. A section at the back of the report is included on how the comments will be considered and if it is deemed necessary to make changes to the SHMA following receipt of these comments. This section also sets out the way in which changes to the SHMA document will be made and details what these changes are.

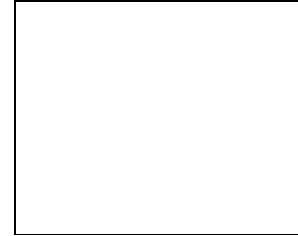
The final part of the report is made up of evidence of consultation that shows that the document was made publicly available and how representations on the SHMA could be made.

Summary of Representations

The majority of the representations received were in support of the SHMA. Some of the issues that were raised however cannot be addressed at this stage, as they do not fall into the remit of the SHMA. For example, specific spatial issues/requests need to be addressed through feeding into the actual LDF policies (such as the Core Strategy) or individual planning applications. Other issues were raised relating to specific areas (such as including information from Housing Needs Surveys and how house price data is utilised) and this has already been included and explained in the SHMA. A few of the comments received also related to thoughts and opinions of those responding the SHMA

and what they feel should happen in the future regarding Ribble Valley. Again, the majority of these cannot be considered as part of the SHMA as it does not set out planning policies. This will be undertaken in the LDF documents, not the baseline.

Some of the representations received however were relevant in that changes to the SHMA need to be undertaken to reflect the comments. Where such changes will take place, these are outlined in the table in the report that outlines how the representations will be considered.



STRATEGIC HOUSING MARKET ASSESSMENT:

TABLE OF REPRESENTATIONS RECEIVED FOLLOWING 2008 PRE-ADOPTION CONSULTATION

The Strategic Housing Market Assessment (SHMA) underwent a six-week consultation in Summer 2008, ending on Monday 1st September 2008. Representations made on the SHMA that were received by the Council can be found in the table below.

REPRESENTATIONS MADE BY:

<p>Name: Bruce Dowles</p> <p>Organisation:* Bolton-by-Bowland</p> <p>Address 145 Whalley Road Clitheroe Lancashire</p> <p><i>* If applicable</i></p>	<p>Postcode: BB7 1HW</p> <p>Daytime Tel No. 01200 426757</p> <p>Fax No:</p> <p>Email Address: Bruce@dowles.co.uk</p> <p>Date of Reps received: 5/8/08 (received 13/8/08)</p>
---	---

REPRESENTATIONS MADE:

Household surveys have been conducted for housing needs in Bolton-by-Bowland and Tosside (including Yorkshire) this Millennium and I cannot determine if that information has been incorporated.

Certainly expectations were raised at the time and the outcome was nebulous. Banding by words does not heighten the awareness of parishes. This parish council is now covered by three wards and four borough councillors when it was created in 1976 to profile the one. **REF 1**

REPRESENTATIONS MADE BY:**Name: Gerald Hitman****Postcode: BB6 8AY****Organisation:****Daytime Tel No. 01254 244400****Address The Estate Office,
Brockhall Village
Lancashire****Fax No: 01254 244403****Email Address:
gerald.hitman@brockhallvillage.co.uk**** If applicable***Date of Reprs received: 19/8/08****REPRESENTATIONS MADE:**

The assessment makes no reference to the upgrading of Ribble Valley Rail now nearing completion and the potential for reducing the number and length of motor car journeys by locating the additional housing, the need for which is established by the assessment, at or close to existing or potential new stations on the line. **REF 2**

The improvement in the quality and frequency of rail services on Ribble Valley Rail and the generation of additional passengers for it is presaged in the Lancashire Local Transport Plan 2006-2010 which adopts the ambition to improve existing and provide new railway stations in Lancashire. No new stations are listed for Ribble Valley for the plan period but they will clearly be desirable during the period to be covered by the LDF.

Whilst the assessment recognizes the problem of outmigration to work, it wholly ignores the question whether home working, the prevalence of which it recognizes, or purpose built work/live accommodation has the potential to generate high GVA employment opportunities in the Borough and reduce outmigration to work and commuting by car. This is particularly regrettable as the Borough Council has on its files quantitative and qualitative studies of such demand from Ribble Valley Enterprise Agency and the LiveWorkNetwork and these do not seem to have been made available to the authors. **REF 3**

Whilst the needs of key workers and the economically inactive for affordable housing are addressed, the need for affordable accommodation for the self-employed who wish to Establish their own enterprises and/ or work from home is not addressed. **REF 4**

REPRESENTATIONS MADE BY:

Name: Councillor Graham Sowter
(Borough Councillor from November 1994 until September 2008)

Organisation:*

Address

** If applicable*

Postcode:

Daytime Tel No.

Fax No:

Email Address:
graham.sowter@btopenworld.com

Date of Reps received: 31/8/08

REPRESENTATIONS MADE:

I wish to make two main comments on our Strategic Housing Market Assessment.

My first comment concerns the way in which measures of affordability are arrived at. I think it is misleading to try and use 'average household income' as the denominator in calculations of affordability. To use figure of £35-40,000 in such cases is very dubious. Such a high figure may be technically correct but it could be the result, say, of a long tail of earners with household incomes of £15-25,000 moved upwards by a few high-earning footballers, doctors, lawyers and business owners etc. A much more meaningful statistical measure would be the 'median' and even this needs to be used with caution. It might be argued (not by me) that home ownership is not always appropriate for those on the lowest incomes, say in the bottom quartile of income earners. But a good measure of affordability might be to divide house prices by the income for those at the top end of that quartile, say the 20th – 25th percentiles of income earners. These are the people most likely to be in need of affordable housing and who are currently priced out. A useful exercise might be to consider a cohort of workers in a typical organisation with a range of salaries from those at the top on £70,000+ to those near the bottom (some second earners) earning £12 -15,000, Ribble Valley Council for example. Arguably all employees of RVBC would be considered as 'key workers' in the local community alongside such groups as teachers, nurses, police etc. It is more around real people doing real important jobs that we should construct our notions of affordability, not just some theoretical and perhaps unrealistic statistical number like an 'average' or a 'median'. **REF 5**

My second comment concerns the council's future policy on extensions and replacement dwellings. The Market Assessment emphasises that our policy should be to produce a balanced housing market for a balanced community with more provision of cheaper, affordable housing; as examples there should be more properties suitable for older people including couples and for single person households. While many if not most of our policies will be geared to ensuring that new-build properties will be in line with our declared housing strategy, we should not lose sight of changes to our existing stock that can pull in almost exactly the opposite direction. The developments that can effect significant changes in the balance of our housing stock are those of house extensions and replacement dwellings. In recent years, and perhaps more especially as the 'moratorium' has been in place, there appears to have been an increase in the numbers of large extensions and the total demolition and replacement of small properties. **REF 6** At the LDF forum on 23rd June, I asked for a quantitative assessment of the rate of attrition of smaller properties that had taken place over recent years and if this has not been done yet, then I believe it should be as part of our evidence base. **REF 7**

No one wishes to prevent a householder from adding to a property with a modest extension as family circumstances change or to inhibit unduly the ability to acquire an old dilapidated property and replace it with a more up-to-date, energy efficient structure. However, the increasing tendency has been for extensions to be getting larger and larger (often up to 100% of the original size) and for replacement dwellings to be up to 100% larger than the old property. **REF 8**

REPRESENTATIONS MADE BY:

Name: Shona Thurlow

Postcode:

Organisation:* Longridge Town Council

Daytime Tel No.

Address

Fax No:

Email Address:
mailto:longrigetowncoucbtconnect.com

Date of Reps received: 1/908

** If applicable*

REPRESENTATIONS MADE:

Longridge Town Council would like to submit their comments as follows having read the document there is nothing within it that they disagree with. The look forward to seeing the housing strategy which comes from this document. **REF 11**

REPRESENTATIONS MADE BY:

Name: Mary-Ann Renton

Organisation:* Grindleton Parish Council

Address The Clerk to the Parish Council,
Old Dairy,
1 Backridge,
Twitter Lane,
Waddington,
Lancashire

** If applicable*

Postcode: BB7 3LG

Daytime Tel No. 01200 4222062

Fax No:

Email Address:
mailto:maryann.renton2@btinternet.com

Date of Reps received: 1/9/08

REPRESENTATIONS MADE:

Grindleton comments on the Strategic Housing Market Assessment

The council would like to see a limited number of new houses including some affordable ones within the village perimeter, but would not like a mini estate bolted on to the village. **REF 12**

REPRESENTATIONS MADE BY:**Name:** Ian Woolstencroft (Town Clerk)**Organisation:*** Clitheroe Town Council**Address**** If applicable***Postcode:****Daytime Tel No.****Fax No:****Email Address:** ianwoolstencroft@btconnect.com**Date of Reps received:** 03/09/2008 (later reps submission date agreed in advance)**REPRESENTATIONS MADE:**

I can now inform you that the Town Council considered the above Document at their meeting held on the 1 September, 2008.

The only comment they have asked me to feed back to you is that they would like to see as much affordable housing provided in the Ribble Valley Area as possible. **REF 13**

REPRESENTATIONS MADE BY:**Name:** Jackie Mason (via Amanda Richardson)**Organisation:*** Elevate East Lancashire**Address** *If applicable*Suite 22
The Globe Centre
St James Square
Accrington
Lancashire**Postcode:** BB5 ORE**Daytime Tel No.** 01254 304550**Fax No:** 01254 304551**Email Address:****Date of Reps received:**

Amanda.Richardson@elevate-eastlancs.co.uk

REPRESENTATIONS MADE:

Thank you for the opportunity to comment on the above report.

As you will be aware, Elevate has commissioned Nevin Leather Associates to undertake an analysis of all of the Pennine Lancashire HMA's to provide a strategic market overview.

Without prejudice to the findings of this work, we feel that the Ribble Valley HMA provides a well evidenced, sound analysis of the market which will be extremely useful in developing the Pennine Lancashire Housing Strategy. **REF 14**

In particular we support your approach to new supply which acknowledges that more housing is needed but that it must be of the right type, size, tenure and quality to meet the needs of local residents. We agree that affordability for local communities poses one of the borough's biggest challenges in creating a balanced and sustainable market. Your approach to this in relation to ensuring that new supply is focused on the provision of smaller, affordable dwellings to meet local needs seems sensible. We support your intention to ensure that affordable units are provided on-site rather than as a developer contribution to off-site provision. This should ensure that local communities remain mixed and sustainable in the longer term. **REF 15**

From a HMR perspective, your proposal to restrict in-migration from the more affluent areas of neighbouring boroughs such as Blackburn with Darwen will support our efforts to create stable markets in these areas through facilitating their retention of higher income earners. **REF 16**

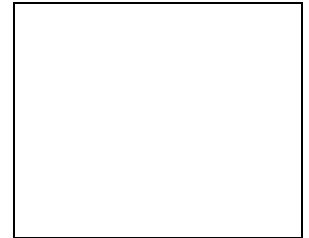
Our strategic view will of course be further informed by the Pennine Lancashire analysis of the HMA's. Once this is complete, Nevin Leather Associates will produce an Issues Paper for discussion with you and our other local authority partners. We will be in touch as soon as possible with the details of a consultation event. **REF 17**

How will be representations be considered?

Each of the representations has been considered in detail and where necessary changes to the SHMA document have been made. These changes are set out below.

Representation reference number	Outcome
1	All information gathered for Housing Needs Surveys was incorporated into the SHMA as outlined in the methodology of the SHMA document. As stated in the SHMA, where information was gathered using a different questionnaire format, this information was excluded to ensure accuracy in results.
2	A degree of information on travel and accessibility is given in the SHMA though the SHMA is not considered the suitable document for this to be explored in detail. This will be addressed in the Strategic Housing Land Availability Assessment (SHLAA), which will deal with potential housing sites on a site-by-site basis.
3	Information on live/work accommodation was made available to the authors of the document and it was flagged up as an area for consideration whilst the work was being undertaken. As a result, information on the issue of live/work was provided in the SHMA. The issue of live/work was considered by the consultants during the Employment and Retail study and there is also a specific piece of work published on the website that relates to live/work which form part of the evidence base.
4	This is addressed in the response to reference 3 above. Additional information relating to affordable live/work has been also subsequently been included on page 97 of the SHMA.
5	The approach to house prices is discussed in the methodology of the SHMA and the reasons for this choice of approach justified. It must be recognised that the aim of the SHMA is to provide an overview of the situation.
6	The SHMA is not adopted, suggested or potential future policy. It is an outline of the situation regarding housing in the borough and is not intended to set out future policy.
7	The evidence base at this stage relates to those documents that are required by CLG to be produced. If other issues are seen as necessary to consider in detail then this may be considered in the future. At this stage however this is not an issue that SHMA needs to consider and therefore will not be incorporated into the adopted SHMA.
8	This is not an issue to be considered in the SHMA. Issues of this nature will be addressed through policies in the LDF.
9	This issue is addressed within the SHMA.
10	Planning policies will be set out in the LDF, not in evidence base documents such as the SHMA.
11	No action required.

12	The SHMA does not aim to address requests such as this. This should be done through comments submitted by the organisation on individual planning applications and the new policy documents of the LDF.
13	Affordable housing is already flagged up as a major issue in the SHMA, therefore no further action required.
14	Support for the SHMA. No further action required.
15	Support for the SHMA. No further action required.
16	Support for the SHMA. No further action required.
17	No further action required.



STRATEGIC HOUSING MARKET ASSESSMENT:

**EVIDENCE OF PRE-APPLICATION CONSULTATION/
INVITATION FOR COMMENT**

The following is taken from the Ribble Valley Borough Council website, illustrating that the document was available to view and a comments form available to fill in and comment on.

Date: 20/05/2008

Dear Councillor xxxxx,

Ribble Valley Borough Council Local Development Framework Conference

I am writing to invite you to a conference on the Local Development Framework (LDF) in the **Council Chambers on Monday 23rd June 2008**. As you are probably aware, the Forward Planning Team has been undertaking work on the Local Development Framework (LDF), which will replace the current adopted Districtwide Local Plan. The conference will be a day to get to grips with the LDF process, the documents that are being produced that make up the LDF and the background documents that make up the baseline of the LDF.

The programme will feature presentations and discussion from consultants working on behalf of the Council and also from Officers working on key LDF documents. The day will provide the opportunity to ask questions about what the LDF means for Ribble Valley, the process we have to follow but in particular to explore site options and development scenarios as we form the plan in light of the consultants work. Tea and Coffee will be available from 9:15am ready for a **9:30am start**. There will be a break for lunch, which will be provided, and it is expected that the day will draw to a close at approximately 3.30pm. A draft agenda is enclosed.

Please could you respond to this letter by returning the reply slip at the bottom of this page and sending it to Diane Cafferty at the above address or by email to Diane.Cafferty@ribblevalley.gov.uk. Alternatively you can phone Diane on 01200 414551 to let her know if you are available to attend.

I look forward to seeing you at the conference.

Yours sincerely,



Councillor Richard Sherras
Chair of Planning and Development Committee.

✕

NAME:.....Councillor Ainsworth.....

I will/ will not be able to attend the LDF conference at 9:15am on Monday 23rd June 2008 in the Council Chambers.

Date: 31/07/08

Dear *Clerk to Parish Council*,

Ribble Valley Borough Council Strategic Housing Market Assessment

I am writing to inform you as Parish Clerk that Ribble Valley Borough Council is currently undertaking a consultation on the Strategic Housing Market Assessment (SHMA). For those of you that attended the LDF workshop at the Council Chambers in June, you may already be familiar with the SHMA. The SHMA is a key baseline document that will inform future policies within our LDF and its main purpose is to provide a snap shot of the borough and its housing market, past trends and future predictions. The SHMA sets out detailed data and analysis on a range of issues, such as the likely overall proportions of households that require market or affordable housing; the likely profile of household types requiring market housing; and the size and type of affordable housing required in the Ribble Valley.

A copy of the response form for any comments on the documents is enclosed. If you would like to submit comments, please fill out this form and return it to the address at the top of this letter and mark it for the attention of Diane Cafferty. Comments must be received by **Monday 1st September 2008**. In the meantime, if you have any queries about the document, please contact 01200 425111 and ask for Forward Planning.

Yours sincerely,

Diane Cafferty
Senior Planning Officer.

Ribble Valley Borough Council


Tuesday 2nd Sep 08

You are here » [Home](#) | [Downloads](#) | [Environment](#) | [Planning](#) | [SHMA Consultation Comments Form](#)

SHMA Consultation Comments Form download

[Download Now](#) ↓

Downloadable form for comments on SHMA consultation

[SHMA Consultation Comments Form](#) 

- **Size:** 47.75 KB
- **Extension:** PDF
- **Estimated download time:** (56k = 7 secs)
- **No. times viewed:** 109

If the link provided is broken, please contact us ...

All content © 2008 Ribble Valley Borough Council : website powered by [Jadu® eGov](#)

Ribble Valley Borough Council

Tuesday 2nd Sep 08

You are here » [Home](#) | [Information](#) | [Environment](#) | [Planning](#) | [Welcome to Planning Policy](#)

Welcome to Planning Policy

LDF Evidence Base

» [View page list in this section](#)

It is required that the policies contained within the LDF be based on a sound, credible and robust evidence base. A series of documents will therefore be produced to inform these policies and where necessary they will be updated on a regular basis. Where work has been undertaken on these evidence based documents so far, they can be found here.

[Strategic Housing Land Availability Assessment \(SHLAA\)](#)

[Strategic Housing Market Assessment \(SHMA\)](#)

[SHMA Consultation Comments Form](#)

Pages in Welcome to Planning Policy

- [1. Introduction](#)
- [2. Contacting us](#)
- [3. Local Development Framework](#)
- [4. Strategic Housing Land Availability Assessment](#)
- [5. LDF Documents](#)
- [6. LDF Evidence Base « You are here](#)
- [7. LDF Related Documents](#)
- [8. Annual Monitoring Reports](#)
- [9. Core Strategy](#)
- [10. Housing and Economic Development DPD](#)

All content © 2008 Ribble Valley Borough Council : website powered by [Jadu® eGov](#)

Ribble Valley Borough Council


Tuesday 2nd Sep 08

You are here » [Home](#) | [Downloads](#) | [Environment](#) | [Planning](#) | [Strategic Housing Market Assessment](#)

Strategic Housing Market Assessment download

[Download Now](#) ↓

The Consultation draft of the Strategic Housing Market Assessment is out for consultation until Monday 1st September 2008. If you wish to submit any comments on this then please download the SHMA Consultation Comments Form. If you have any queries regarding the SHMA please contact 01200 414551

[Strategic Housing Market Assessment](#) 

- **Size:** 1.68 MB
- **Extension:** PDF
- **Estimated download time:** (56k = 4 mins 12 secs)
- **No. times viewed:** 181

If the link provided is broken, please contact us ...

All content © 2008 Ribble Valley Borough Council : website powered by Jadu® eGov

ints 2/6/08 circulation.



RIBBLE VALLEY BOROUGH COUNCIL

please ask for Phil Dagnall
direct line 01200 414570
fax 01200 414487
e-mail Philip.Dagnall@ribblevalley.gov.uk
my ref LDFupdate1
date 20th May, 2008

Council Offices
Church Walk, Clitheroe
Lancashire BB7 2RA

Tel: 01200 425111
Fax: 01200 414488
DX Clitheroe 15157
www.ribblevalley.gov.uk

Dear Parish Clerk,

Ribble Valley Borough Council Local Development Framework

I am writing to invite Parish Councillors to an evening workshop to be held in the **Council Chambers on Monday 7th July from 6.30 to 9pm.**

The Forward Planning Team has been working on the new plan for the area (the Local Development Framework or LDF) which will replace the current Local Plan over the next few years. You may remember that earlier in this process last year we held a workshop with parish council representatives which discussed the general issues they felt faced the borough.

Since then we have held a widely publicised public consultation event canvassing views about the future of the area and a series of focused workshops with specific groups such as school children and disabled groups. We have also commissioned from consultants several detailed pieces of research.

All the work above has helped to clarify some of the major issues we will all have to deal with in the coming years such as housing numbers and potential patterns of development; the future of our shopping centres and where employment land should be placed.

We'd like to now update you on the results of this work and get your views on what you think the implications are for your communities and the borough as a whole. This will really help us in going forward from here to the next stage in putting the new LDF plan together. We'll have tea and coffee waiting.

We hope that up to two representatives from each Parish will be able to attend.

Please could members RSVP to this letter by post or email to Philip.Dagnall@ribblevalley.gov.uk or alternatively phone me on 01200 414570.

Yours sincerely

Phil Dagnall, Assistant Planning Officer