
Report to Ribble Valley Borough Council

by Simon Berkeley BA MA MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 25th November 2014

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE
RIBBLE VALLEY CORE STRATEGY**

Document submitted for examination on 27 September 2012

Examination hearings held between 14 and 22 January 2014

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Abbreviations Used in this Report

AONB	Area of Outstanding Natural Beauty
CS	Core Strategy
DtC	Duty to Co-operate
EZ	Enterprise Zone
LDS	Local Development Scheme
MM	Main Modification
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment

Non-Technical Summary

This report concludes that the Ribble Valley Core Strategy provides an appropriate basis for the planning of the borough providing a number of modifications are made to the Plan. Ribble Valley Borough Council has specifically requested me to recommend any modifications necessary to enable the Plan to be adopted.

All of the modifications to address this were proposed by the Council but where necessary I have amended detailed wording. I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Clarifying the Council's intentions for allocating land;
- Increasing the overall level of housing to 5,600 over the plan period, equating to an annual average of 280;
- Refining the settlement hierarchy and clarifying the spatial direction of growth;
- Setting out the level of housing anticipated in relation to the modified settlement hierarchy;
- Introducing a housing trajectory;
- Defining and clarifying the term 'defined settlement';
- Modifying the Key Diagram;
- Setting a deliverable objective for affordable housing and clarifying policy details;
- Limiting development on the Standen site to land in Flood Zone 1, and clarifying the phasing and other delivery arrangements;
- Clearly encouraging the effective use of land through the re-use of brownfield sites;
- Clarifying the position in relation to accommodation for Gypsies and Travellers;
- Slightly reducing the commitment to allocating employment land;
- Clearly committing to allocating land for retail development;
- Ensuring the renewable energy and sustainable design policies are effective and consistent with national policy;
- Setting clearer commitments to partnership working on infrastructure;
- Altering the development management policies to ensure that they are effective;
- Aiming for a net enhancement of biodiversity;
- Ensuring an appropriate approach in relation to heritage assets; and
- Introducing an effective monitoring framework.

Introduction

1. This report contains my assessment of the Ribble Valley Core Strategy (the CS/the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended) (the 2004 Act). It considers first whether the Plan's preparation has complied with the Duty to Co-operate (DtC), in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) (NPPF) makes clear that to be sound, a Local Plan such as the Core Strategy should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the draft Plan as originally submitted.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. In December 2012 the Council requested that the examination be suspended to allow further work to be carried out. I agreed to this. Additional evidence was produced and this led to the Council proposing some modifications to the submitted Plan. Both the new evidence and the suggested revisions were the subject of consultation before the hearings took place. Further modifications were put forward by the Council both during and after the hearings. A public consultation on a comprehensive schedule of the modifications advanced by the Council, along with the associated sustainability appraisal, was held for six weeks from the end of May to early June 2014. It consequently came to light that the Council's webpage could have inadvertently caused confusion regarding the modifications being consulted upon. To rectify matters, the Council undertook a further six week consultation on the modifications.
5. I have taken account of all the responses from every consultation in coming to my conclusions in this report. Indeed, some have persuaded me to either reject the revision suggested by the Council or to amend detailed wording. None of the changes I have made to the modifications undermines the participatory processes and sustainability appraisal that has been undertaken.
6. Other changes have also been put forward by the Council. However, these comprise minor or consequential revisions and factual updates. Whilst generally helpful and to be welcomed, their inclusion in the Plan is not essential for soundness and I have therefore not referred to them in this report or the Appendix.
7. Following a period in 'beta mode' and some revision, the national Planning Practice Guidance (NPPG) was launched on 6 March 2014. Given the consultation on the earlier draft of the NPPG, the changes made in the final

version and the main issues in this examination, the publication of the NPPG has had no significant effect on the examination and it has not been necessary to refer back to participants.

Assessment of Duty to Co-operate

8. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by Section 33A (S33A) of the 2004 Act in relation to the Plan's preparation.
9. The arrangements in place for joint working are set out in the Council's DtC supporting paper [Post 3.3]. They include on-going and standing provisions for discussion on a wide range of topics encompassing housing and economic matters, renewable energy and environmental issues, to name but a few. It is apparent that the Council has sought to engage constructively with the bodies prescribed through S33A of the 2004 Act at appropriate stages in the plan making process, as well as with other relevant organisations.
10. Housing is perhaps the issue of greatest strategic, cross-boundary relevance. While most of Longridge is within the Ribble Valley area, part is within the administrative boundary of Preston City Council. Both authorities have clearly co-operated in this regard. The Plan applies an adjustment to the level of new housing earmarked for Longridge to take account of housing anticipated on Preston's side. Moreover, both Councils have, until recently at least, identified Longridge similarly in their emerging local plans. Preston City Council's approach has altered recently. But this does not change my view that Ribble Valley Borough Council has co-operated with the City Council to maximise the effectiveness of the Plan's preparation.
11. Blackburn with Darwen Borough Council has raised concerns in relation to the increase in housing proposed through the modifications advanced by the Council. The worry is about the effect of this on housing delivery planned in Blackburn, for reasons set out in the response paper [Post 8.5]. Nevertheless, both Councils consider that this is not a DtC issue. It is their shared opinion that while they disagree about the proposed modifications to the Plan, the DtC has been met. I concur that the DtC under S33A does not demand agreement. Consequently, and considering the evidence of constructive engagement between the two Councils, I do not regard the differences between them as any failure in relation to the DtC.
12. The Council has also cooperated with Lancashire County Council, South Ribble Borough Council and the Local Enterprise Partnership in putting into place a Local Development Order for the Samlesbury Enterprise Zone (the EZ). The EZ is a strategic location for economic development and is predominantly occupied by BAe. It straddles the Ribble Valley and South Ribble administrative boundaries.
13. In addition, the Forest of Bowland Area of Outstanding Natural Beauty (AONB) spans across the boundaries of Ribble Valley and Lancaster City Council. It is apparent that the two local authorities, and the AONB team, have cooperated in relation to the effects of the CS on the AONB.

14. The bodies prescribed under S33A have each provided to the Council a letter stating their position in relation to the DtC [Post 5.13.1]. Some unambiguously say they consider the DtC to have been met. Others strongly suggest this, and none raise any unequivocal objections in this regard. I conclude that the DtC has been met.

Assessment of Soundness

Main issues

15. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified seven main issues upon which the soundness of the Plan depends.

Issue 1 – The basis for the overall approach

Whether the Plan has been positively prepared and whether the approach taken justifies it when considered against the reasonable alternatives

General

16. The CS is one of two development plan documents intended by the Council. The other is the Housing and Economic Development Development Plan Document (the allocations plan). However, neither the CS nor the Council's Local Development Scheme are particularly explicit about the intentions for the allocations plan. Little is said about the types of land uses the allocations will encompass or the sorts of land designations proposed. This raises questions about the effectiveness of the CS.
17. To address this, the Council has put forward a modification (**MM14**). This commits the Council to bringing forward allocations for a variety of development types, including for necessary infrastructure such as schools and highway proposals, if land is required. It also makes it clear that designations will be made in relation to nature conservation and factors such as heritage and landscape protection. All of this is essential to enable a proper understanding of the Council's plan making approach and the role of the CS within it.

Engagement and positive preparation

18. I have already noted above the key cross-boundary issues for the CS. In addition to the DtC, these also have a bearing in relation to the Plan's positive preparation. However, from all I have read and heard, I am of the firm view that in relation to these matters, adequate constructive engagement has been undertaken and the CS has been prepared as positively as one can reasonably expect.
19. I note that some have raised the question of whether Ribble Valley should meet some of the housing needs arising in Blackburn. However, Blackburn with Darwen Council is clear that they intend to meet their own housing need.

In addition, while I note the objections from Blackburn with Darwen Council in relation to the increase in the level of housing proposed through the CS, there is no clear or compelling evidence to irrefutably demonstrate that this will have adverse effects on housing delivery in Blackburn. In this context, Ribble Valley's starting point for positively preparing the CS is to ensure that it meets objectively assessed housing needs. As I discuss under Issue 3 below, this is the approach taken, and in the circumstances is the most appropriate.

20. Considering this issue more generally, a variety of engagement techniques have been used. These have included workshops with the general public invited to attend, drop-in events and a series of 'open meetings' where people were able to talk directly with planning officers on a one-to-one basis. All of this is positive.
21. Some have suggested that the Council has consulted with communities but not listened to their views. However, from the evidence, it is clear to me that the Council has given due consideration to the opinions expressed. There is a significant difference between not listening and not agreeing. The positive preparation of a Local Plan cannot be predicated on the notion that all involved will be satisfied by the outcome. In drawing up Local Plans, Councils frequently have to balance the need for development against local opposition to it. Such is the case here. The level of objection to some aspects of the CS clearly indicates the strength of local opinion on those matters. But it also suggests that the Council has been successful, one way or another, in engaging local residents and others in the process.

The assessment of alternative options

22. Evaluating reasonable alternatives is a fundamental strand of plan making. By and large, the Sustainability Appraisal (SA) is the primary tool used to perform this function.
23. SA of the options under consideration has been undertaken at various appropriate points in the Plan's formulation. From the original SA report, a number of report addenda have been produced and consulted on alongside the emerging CS. At the most strategic level, the Plan's vision and strategic objectives have been assessed. So too have a number of options for the spatial strategy, particularly in relation to the distribution of housing across the borough, and alternatives to the proposed Standen site. The SA has also evaluated the Plan's suite of Key Statements and development management policies. The assessment considers the options for each of these factors against 23 SA objectives using a scoring system of the type commonly used.
24. The SA objectives are quite wide in scope and satisfactorily reflect the economic, social and environmental dimensions of sustainable development. In short, they are adequate to ensure that the options have been suitably tested. Overall, I consider that the SA provides a sufficiently robust evaluation of the CS against the reasonable alternatives.
25. A Habitats Regulations Assessment Screening Report (March 2012) has been produced. This undertakes a screening exercise in relation to 15 European Sites either within Ribble Valley or within 15 kilometres of the Council's administrative boundary. It considers that the CS is unlikely to have any

significant effects on the relevant European Sites identified, either alone or in combination with other plans or projects. As such, it concludes that an Appropriate Assessment is not necessary. Natural England has confirmed that it concurs with this conclusion.

Flood risk

26. In liaison with the Environment Agency and United Utilities, a Level 1 Strategic Flood Risk Assessment has been prepared to underpin the CS. The risk of flooding has also been clearly taken into account in the Strategic Housing Land Availability Assessment (SHLAA). It has been a factor against which the sites assessed have been rated, and land at risk of flooding has been penalised through the scoring system. Moreover, it is also apparent that the SA has taken account of flood risk. It has been identified as a key constraint in relation to the development strategy set out in Key Statement DS1, particularly where land in Flood Zone 3 is concerned.
27. Given this, I am satisfied that the Plan's assessment of options is founded on adequate consideration of flood risk. The broad thrust of the strategy is therefore justified in this regard. In terms of avoiding inappropriate development on land at risk of flooding, much will rest on the allocations plan. It is, though, significant that the 1,040 new homes and other development earmarked for the Standen strategic site can be accommodated on land which is wholly within Flood Zone 1, and **MM16** requires this.

Viability

28. A Viability Study (August 2013) [Post 5.10] has been produced. It uses a residual valuation method to assess the viability of residential development. The methodology models different types of sites and applies a number of assumptions relating to development costs, land values and profits. As with all studies of this sort it is inevitably 'high level' in nature and is sensitive to the assumptions made.
29. That being said, the Viability Study has considered 16 site typologies based on sites in the SHLAA. This is a reasonable range and has some foundation in reality, which adds to the confidence that can be had in it.
30. In addition, it seems to me that in the context of the methodology and purpose of the Viability Study, the assumptions made are founded on appropriate evidence and are broadly reasonable. Both agricultural and brownfield land prices have been considered. The Valuation Office Agency's Property Market Report has been drawn on. However, as this does not include values specific to Ribble Valley, consultation was undertaken with local agents.
31. Base build costs have been taken from Building Cost Information Service (BCIS) data. To ensure that national building standards are properly reflected, an allowance of 6% has been added to reflect the cost of building to Level 4 of the Code for Sustainable Homes. Other costs assumptions include 10% for the various professional fees involved, 2.5% for contingencies in respect of greenfield sites and 5% for brownfield developments. A developer's return of 20% of gross development value has also been included. For planning obligations, a base assumption of £2,500 per unit is allowed for. These values appear generally appropriate to me. Moreover, it has been assumed that all

schemes are entirely debt funded at 7% interest. This is quite a generous allowance which helps lend confidence in the viability buffer.

32. Residential 'asking prices', including for new build properties, across Ribble Valley have been analysed and median average asking prices for main settlements and rural areas arrived at. It appears that a 3% allowance has been made for 'incentives', to address the difference between asking and achieved prices.
33. In general terms, the assumptions made are based on appropriate evidence and strike me as broadly reasonable. Local circumstances and values have been reflected where possible. Indeed, to this end, a stakeholder event was held with local landowners, developers, agents and valuers.
34. Crucially, though, it is evident that costs arising from the policies in the CS have been squarely taken into account. In particular, through Key Statement H3, where certain site size thresholds are met, the Plan requires 30% of new homes to be affordable. The Viability Study includes this, and has sensitivity tested up to 40% affordable housing with levels of planning obligations higher than the base assumption, up to £15,000 per unit.
35. Key Statement H3 also seeks 15% of homes to be for older people. The Viability Study assumes this means meeting Lifetime Homes Standards, and has included an additional £1,000 per unit.
36. In reaching a view about viability, the Viability Study applies a 20% viability threshold. That is to say, in order to be judged viable, the residual value must exceed the existing or alternative use value, whichever is the greater, by a margin of 20%. This in effect represents the competitive return necessary to incentivise a willing landowner. An additional flat rate premium of £300,000 per hectare has also been added in relation to greenfield land. I consider all of this to be appropriate.
37. On the basis of this viability threshold and the base assumptions, the study concludes that only two of the 16 typologies are unviable. These are both brownfield sites with significant 'abnormal' costs. According to the study, these sites represent less than 1% of the SHLAA sites.
38. Appraisals have not been undertaken in relation to economic development. However, I concur that this should not be regarded as a shortcoming. The CS policies do not add to the financial burdens on developments of this type. As the Council points out, even if it is the case that economic development is not presently viable, there is nothing in the CS that materially worsens the situation. That is a reasonable stance to take.
39. Overall, I consider that the Viability Study represents sufficiently robust evidence on the impacts of the Plan on development viability. It amounts to a reasonably reliable demonstration that the Plan's policies need not render unviable schemes that would otherwise be a viable prospect.

Conclusion on Issue 1

40. Considering the above, I conclude that the Plan has been positively prepared and that, with the main modifications put forward by the Council, the approach

taken justifies it when considered against the reasonable alternatives. There is, therefore, a sound basis for the Plan.

Issue 2 – The spatial strategy

Whether the spatial strategy is justified, effective and consistent with national policy

41. Key Statement DS1 sets out the development strategy. In effect, it is the policy that lays the foundation for Ribble Valley's spatial direction of growth and lies at the heart of the Plan.
42. As submitted, though, Key Statement DS1 is neither effective nor justified. When taken together with the table at paragraph 4.11 one can discern the proposed distribution of housing. But a significant portion of homes are identified against 'other settlements'. Beyond the principal settlements of Clitheroe, Longridge, Whalley and the Standen strategic site, one is largely left guessing as to the Plan's intentions. Similarly, while the Barrow Enterprise Site and the Samlesbury Enterprise Zone are named as the focus for economic development, the expectations for retail and leisure development remain unclear at best. This is a matter of the Plan's effectiveness.
43. However, the Council has put forward a main modification (**MM2**) to address all this. I agree it is necessary to unambiguously articulate the spatial direction of growth and to clearly set out the settlements identified for growth and the type and general level of development anticipated.
44. As altered, Key Statement DS1 clearly sets out a coherent hierarchy of settlements. It directs the majority of new housing to the Standen site and the aforementioned principal settlements. The centres of the principal settlements are identified for retail and leisure development. Perhaps even more importantly than that, 32 'defined settlements' are introduced and categorised into Tier 1 and Tier 2 Villages. The former are proposed as a focus for development, while in the latter development is restricted to that meeting local needs or having regeneration benefits.
45. I am of the firm view that the development strategy and hierarchy of settlements proposed through **MM2** is justified. There can be little serious doubt that Clitheroe performs the function of a principal settlement. I am mindful that substantial levels of objection have been voiced in relation to the identification of both Longridge and Whalley as a focus for development, particularly in respect of new housing. I have taken account of all the points made. But in the context of the Ribble Valley, both are settlements of significant size and population. Relative to the borough's other settlements, both are well provided with shops, services and facilities. They function as centres for the areas surrounding them, and meet more than immediately local needs. In short, alongside Clitheroe, they are unequivocally the most sustainable settlements in the borough.
46. The Council's evidence bears out this view. Building on the detailed work of the 2006 Settlement Audit [Post 7.1], the Settlement Hierarchy document (2008) [Supp 4.9] appraises all of the borough's settlements. In effect, it

scores them against a range of sustainability indicators, categorised under the broad headings of transport, convenience services, community facilities, health provision, education and employment. Contextual and demographic information is also considered.

47. Within the Settlement Hierarchy document the sustainability indicators are weighted. Some factors such as community facilities and convenience services have greater sway on the outcome than health provision and employment. I note the criticisms about this, and those concerning the scores given to individual settlements under some of the categories. But this is not a wholly scientific methodology. Nor could it be. Like many aspects within the sphere of town and country planning, it is inevitably influenced by professional judgments. To my mind, this is a legitimate approach to take. Consequently, in relation to the principal settlements, I regard the Settlement Hierarchy document analysis to be adequately reliable.
48. During the examination, to address soundness concerns, the Council re-examined the borough's other settlements to draw up the more refined settlement hierarchy. The approach is set out in the Council's paper 'Defining the more sustainable settlements and patterns of housing development' (April 2014 [Post 11.7]). It re-evaluates the facilities and services in each settlement. It also takes into account constraints such as the AONB, Green Belt and flood risk. Capacity for growth is also considered, and information in the SHLAA is drawn on. House price to income ratios have also been used as an indicator in relation to affordable housing delivery. It is the analysis of all this which has led to the categorisation of settlements as Tier 1 or Tier 2 Villages.
49. A SA Report Addendum (May 2014) [Post 11.2] undertakes further appraisal of the proposed hierarchical division. I agree with its conclusion that, on balance, the nine settlements proposed for Tier 1 perform best overall in terms of the SA Objectives. This is quite a finely balanced matter, and neither the Council's analysis nor the SA lead to clear-cut results. Some villages in Tier 2 do perform well against some of the objectives. But their constraints, such as being within the AONB, and other disadvantages, when taken as a whole, amount to good reason for not promoting them as a focus for development. The CS is the place for making difficult, balanced decisions like this.
50. Overall, from all the evidence and my visits around the borough I consider the hierarchy of principal settlements, Tier 1 and Tier 2 Villages to be soundly based and adequately justified. With this hierarchy in place, along with the other alterations to Key Statement DS1 proposed by the Council under **MM2**, the Plan is satisfactorily effective in terms of directing the spatial distribution of growth and, considered in the round, will lead to the most sustainable pattern of development. Moreover, I agree that **MM33** is also necessary to ensure that the revisions to Key Statement DS1 are consistently applied, particularly in the consideration of specific development proposals.
51. As previously mentioned, the development strategy relies in part on the notion of 'defined settlements'. The Council's intention is that settlement boundaries will be identified for them in the allocations plan. **MM10** introduces a definition of 'defined settlement', and **MM23** ensures that Policy DMG2 refers

to the term correctly, to avoid uncertainty. This is necessary for the Plan's effectiveness.

52. The Council proposes to modify the Key Diagram (**MM13**) in the light of these changes, to identify the principal and other defined settlements. Samlesbury Enterprise Zone and Barrow Business Park are also shown. This modification is needed as it indicates, to some extent at least, the spatial distribution of growth across the borough. While the illustration might be more illuminating, the amendment renders the Key Diagram adequate.

Conclusion on Issue 2

53. Considering the above, with the main modifications put forward by the Council, I conclude that the spatial strategy is justified, effective and consistent with national policy.

Issue 3 – Housing

Whether the Plan's strategy for housing is justified, effective and consistent with national policy

The overall level of new housing

54. Key Statement H1, as submitted, says that land for residential development will be made available to deliver 4,000 dwellings, estimated at an average annual completion rate of at least 200 dwellings per year over the period 2008 to 2028. However, this was based on a Strategic Housing Market Assessment from 2008, and other out-dated evidence.
55. To rectify matters, the examination was suspended and the Council undertook further work relating to housing need, among other things. A Housing Requirement Update (the Update) [Post 5.8] was produced. It aims to provide the objective assessment of housing need required by the NPPF. It considers a number of scenarios and gives an annual average dwelling requirement for each. In the light of the Update, the Council proposed to increase the level of housing planned for to 5,000 overall, being an annual average of 250.
56. The Update's assessments draw on relevant demographic and household projections. They are as objective as one can realistically expect. There is no one way to objectively assess housing need. The issue here, then, is which of the projections best represents the borough's housing need.
57. Paragraph 4.19 of the Update refers to the NPPF, which makes it clear that "every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth". On this basis, paragraph 4.20 of the Update says "it is important that the identified level of economic growth aspired to in the emerging Ribble Valley Local Plan dovetails with the level of housing provision therein". Paragraph 4.22 of the Update then says:

"In particular, if the Council were to pursue a figure significantly lower than 280 dpa whilst also planning for annual job growth of 100 per annum to 2028

despite an ageing population, it would need to explain how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower-growth approach would give rise to. It would also need to evidence how the adverse impacts of meeting housing needs, would 'significantly and demonstrably outweigh the benefits' [The Framework, para 14] as well as make provision, through the duty-to-cooperate, for those needs to be met in full elsewhere within the housing market area."

58. In relation to the objectively assessed need for housing, these paragraphs are not wholly without ambiguity. However, on reading overall, the Update considers that any housing need figure should reflect anticipated job growth. Were this not the case, it would not be necessary to address paragraph 14 of the NPPF as suggested.
59. Given this, the Update discounts any figure significantly lower than 280 dwellings a year. But as I see it, 250 dwellings per annum is significantly less than 280. The significance is that it would only, as the Update's paragraph 4.25 puts it, "*meet the majority of national policy objectives ... and the majority of economic needs*". To put it another way, neither the objectively assessed housing needs nor the economic needs of the borough would be fully met.
60. Consequently, on the evidence produced in this case, particularly from the Council's Update, I consider that 5,600 (an annual average of 280) should be regarded as the objectively assessed housing need. It is the only figure produced by the Council with any clear and tangible evidential basis.
61. I recognise that this is not a 'policy-off' demographically based figure. But neither is it a policy-based constraint of the kind specifically ruled out from assessments of housing need. Quite the reverse. It gives rise to a greater need figure than the demographically based projections.
62. I note the points about 'clawing back' out-commuting for employment purposes, increasing economic activity in the borough and providing affordable homes for those with a connection to the Ribble Valley. However, there is little to substantiate the argument that these measures would adequately "*mitigate or avoid the adverse housing, economic and other outcomes that a lower-growth approach would give rise to*". I am not persuaded that they would. In addition, in this regard I am particularly mindful of Ribble Valley's ageing population and the implications of this for housing provision.
63. Furthermore, there is no clear evidential basis that "*the adverse impacts of meeting housing needs would significantly and demonstrably outweigh the benefits*". The SA Addendum Report [Post 5.16] appraises both the 250 and 280 options. At the hearing, the report's author confirmed that the SA indicates little difference between the two options. Indeed, from my reading of it, the SA shows that 280 dwellings per annum would have only a marginally greater impact in terms of two objectives, being protecting and enhancing landscape and townscape character and quality, and promoting the use of more sustainable modes of transport. In this context, the additional adverse impacts of planning for 280 dwellings per annum are not sufficient to justify the 250 proposed by the Council. Even if they were, it would be necessary for the shortfall to be provided elsewhere, in a neighbouring district.

64. The Council has proposed main modifications to address all this. **MM6** increases the overall level of housing in Key Statement H1 to 5,600 at an annual average target rate of 280. **MM9** also reflects this increase. These changes are necessary for soundness.
65. However, the Council also proposes to delete from Key Statement H1 the reference to the housing target as being "at least" 5,600. But there is nothing in the evidence to justify this change. Indeed, it seems to me that treating the figures as a minimum target reflects the Government's broad aim of boosting significantly the supply of housing. As such, this revision is not needed to make the Plan sound.
66. A modification is proposed (**MM29**) introducing a housing trajectory. It shows the anticipated delivery of both market and affordable housing over the plan period. This is consistent with the NPPF.
67. In May 2014, the Office for National Statistics published 2012-based sub-national population projections. However, much detailed work is necessary to derive household projections and housing need figures from population projections. Requiring the Council to undertake such work would result in significant delay to the Plan and undermine its progress. At such a late stage in the plan making process, that would be unreasonable. The Council is in any case under a statutory duty to keep matters under review.

The Standen strategic site

68. A significant proportion of the housing planned for is proposed to be on land forming part of the Standen Estate to the south east of Clitheroe. It is identified in the Plan as a strategic site and is delineated on a plan. It is earmarked to provide 1,040 new homes, along with employment, community uses, local retail and service provision and open space. In housing terms, the Plan is quite heavily reliant on the Standen site.
69. During the course of the examination, following the Secretary of State's decision to not call in the application, the Council granted outline planning permission on the site. In summary, this is for 1,040 dwellings, local retail, service and community facilities, employment floorspace (Use Class B1), public open space and a primary school, among other things. Following issue of the decision, an application was made seeking permission to apply for a judicial review of it. The application was refused on all grounds. Subsequently, a renewal of the claim for permission to apply for judicial review was sought. I am told that this too has been rejected by the court.
70. A footnote to paragraph 47 of the NPPF clearly explains the meaning of deliverability. At present, Standen is a site with planning permission. There is no clear evidence of the sort mentioned in the footnote that it will not be implemented within five years. Indeed, additional viability work [Post 7.19] has been undertaken. This is based on the same methodology as the Viability Study, and includes the same assumptions save for instances where actual values are known. Notably, significant 'abnormal' costs are included, amounting to £16,429,800. This work concludes that the residual value is sufficient to provide a competitive return to a willing landowner, and that there is a significant margin to be able to accommodate further unexpected costs.

In short, it shows that the approved development is not at the limit of viability.

71. Moreover, there is no clear evidence that there is no longer a demand for the type of units likely. Phasing is an issue. Largely due to the scale of the site, only a portion of it will be developed in the first five years. But, as discussed below, that has been taken into consideration by the Council in relation to land supply and a modification to the Plan deals with this. The infrastructure requirements are clearly known, and have been taken account of in both the viability work and the planning permission granted. In this context, Standen should be regarded as deliverable.
72. Taking account of all the evidence, from all I have read and heard, and from my visit to the Standen site, I consider the Plan's identification and categorisation of it to be appropriate. It is a site that already has planning permission for the development envisaged by the Plan. On this basis alone it would be unreasonable to reject it.
73. Moreover, there is no compelling evidence sufficient to persuade me that any issues arising from the development proposed for it could not be satisfactorily addressed. Indeed, it seems highly likely to me that a suitable solution could be found to prevent any unacceptable impacts. In reaching this view I have had regard to the landscape and other environmental impacts likely to result, and the site's relationship to heritage assets and the AONB. However, in the context of re-casting the entire planning strategy for the borough to ensure that its development needs are met, and considering the evidence concerning alternative options, I regard the Plan to be sound in relation to Standen.
74. Modifications **MM16 and MM17** add detail to the Plan about the manner of delivery of the Standen site, in terms of factors such as phasing and the preparation of masterplans and design briefs. They restrict development on the part of the site in Flood Zones 2 and 3 to water compatible uses. They also ensure that the effects on heritage assets and their setting are taken squarely into account, including in relation to the Grade II* Listed Standen Hall and the Grade II Listed Buildings near the site. This is all appropriate and adds to my conclusion on this point.

The spatial distribution of new housing

75. The way in which the overall level of housing is distributed between the settlements is underpinned by a general approach of ensuring that some new development occurs in some of the borough's more rural settlements – the aforementioned 32 defined settlements. The Council explains that the apportionment to these 32 settlements derives from one of the options considered during the Plan's formulation. This assigned 20% of the total CS housing requirement to this group of 32 settlements. At that time, against the former Regional Strategy target, that amounted to around 20 dwellings per settlement on average. This figure has been slightly revised each time the overall housing level being planned for has increased.
76. The proportion of homes identified for the three principal settlements has been mathematically derived. Subtracting the figure for the 32 defined settlements, the remainder has, broadly speaking, been distributed between the principal

settlements based on their relative populations. The Standen site's contribution has been included within the figures for Clitheroe which, given their relationship, is suitable.

77. Though possibly unusual, I see no particular problem with this general approach. A distribution founded on a notion of securing a reasonable level of rural housing has merit – it puts rural communities at the heart of the Plan's formulation. In any case, it is evident that the outcome of this approach earmarks the vast majority of new housing to the most sustainable settlements in the borough. The division of housing between them effectively uses population as a proxy for sustainability credentials. In the context of the three settlements concerned and the shops, services and facilities present in each, this is appropriate.
78. One complicating factor is the 'Longridge adjustment'. In effect, 200 dwellings which would otherwise be apportioned to Longridge have been deducted because of anticipated delivery in Preston City Council's part of Longridge. As submitted, the CS re-distributes this figure to the group of 32 defined settlements.
79. Following the housing level increase to 5,600, the Council has put forward modifications which affect much of this. **MM2** introduces a new table, which is also reflected in **MM3, MM7 and MM8**. This sets out the number of new homes for Clitheroe, Longridge and Whalley in total and as residual figures. The apportionment generally follows the population-based methodology. More importantly, though, the table also assigns specific housing numbers to each of the Tier 1 Villages individually. The apportionment to the Tier 1 Villages as a group roughly reflects the 20% previously allotted to the 32 defined settlements. As I understand it, the apportionment between them broadly reflects their relative size or populations. The less sustainable Tier 2 Villages are allotted a nil requirement, as new housing in them is restricted to that needed to meet local needs or for regeneration purposes. Furthermore, the Longridge adjustment is distributed among the Tier 1 Villages only.
80. In reaching a view about the approach taken to housing distribution, a measure of realism is called for. There is no formula for this task. The question then is whether it has been tackled in a reasonable and realistic way.
81. Insofar as a methodology has been applied, it has been neither entirely systematic nor rigidly stuck to. But that in itself does not invalidate the process or its outcomes. The general principles underpinning the distribution, especially that of ensuring some growth in more rural areas, have their roots in options appraisal and have been embedded in the Plan through much of its preparation. It may be that professional judgement has played a more significant role than is sometimes the case. Even so, it has been founded on a base of satisfactorily robust evidence about the settlements' relative sustainability credentials. Looked at in the round and as a matter of planning judgement, I consider the proposed housing distribution to have been drawn up in a satisfactory manner. As such, the level of new housing assigned to each settlement is adequately justified. Indeed, it strikes a harmonious chord with the Government's aim of promoting sustainable development in rural areas by locating housing where it will enhance or maintain the vitality of rural communities.

Land supply

82. Where there has been a record of persistent under delivery of housing, it is necessary for planning authorities to add an additional 20% buffer to the supply of land for housing identified for the first five years, moved forward from later in the plan period. The Council agrees that this is necessary.
83. The supply of deliverable land for housing can change significantly in short periods of time. The grant of a single planning permission can make all the difference to the presence or absence of a demonstrable five year supply. The Council's most recent evaluation is set out in the Housing Land Availability Schedule of April 2014 [Post 11.11]. This identifies the present supply from sites with planning permission, sites subject to the signing of legal agreements and other sources. Sites known not to be deliverable are discounted, and a 10% deduction is made for slippage. The five year requirement against the Plan's annual average of 280 dwellings is then calculated using the 'Sedgefield method'. This is all appropriate. The result indicates that the Council can demonstrate a supply of 5.16 years.
84. I recognise that an allowance of 300 homes has been made for delivery at the Standen site in the first five years, and also for a site at Barrow for which outline permission for 504 houses has been granted on appeal. Actual phasing on these sites may be different to these assumptions. Even so, for present purposes, I regard these figures to be broadly reasonable.
85. I note that the expectations of the NPPF concerning a five year supply are met by only a modest margin. But, for soundness, the critical point is that they are met. The margin represents a buffer in this regard, albeit a limited one. Moreover, the exclusion of windfall sites suggests that the present five year land supply assessment may be a conservative estimate, especially considering the points below about the stock of developable land. It is apparent that windfall sites have been coming forward as a source of housing delivery.
86. A clear housing implementation plan will be an important tool for the Council over the coming years. This should be developed alongside the monitoring framework to ensure that a five year supply of housing land is maintained. The Standen site will undoubtedly be a significant factor here and delivery should be particularly closely monitored. Over time actual delivery rates may alter what one can reasonably expect of its contribution to the five year supply.
87. Looking beyond the first five years, the Council has identified sufficient land to meet the Plan's longer term housing commitments. The Strategic Housing Land Availability Assessment Update (November 2013) [Post 7.15] (the SHLAA) identifies land which it says could provide around 6,294 dwellings in the five year supply, with further land for 8,407 homes in years six to fifteen. Even allowing for substantial optimism on the part of the SHLAA's authors, including in relation to housing density, this is a significant reserve. In addition, no allowance has been made for windfall sites. This all adds to the degree of confidence one can place in the Plan and the likelihood that its deliverability is a reasonable prospect.

88. The Council calculates that around 34% of the sites in the SHLAA are previously developed. I note that the CS does not include any quantified expectations in relation to providing housing on brownfield land. However, through **MM22**, Policy DMG1 clearly seeks to encourage the effective use of land by re-using brownfield sites. It will be incumbent on the Council to consider this in drawing up the allocations plan. I am satisfied that the aim of the NPPF is met in this regard.
89. Overall, the clear indication from the evidence here is that there is a satisfactory supply of land. Whether additional land is necessary in some settlements to deliver the proposed spatial distribution of housing will be among the matters to be addressed in the allocations plan.

Affordable housing and housing for older people

90. It is patently evident that there is a pressing need for affordable housing in Ribble Valley. The level of that need and whether the CS does enough to address it is the focus of this issue.
91. Again during the examination's suspension, the Council produced a Strategic Housing Market Assessment (June 2013) [Post 5.7] (the SHMA). This updates the 2008 SHMA. Although the SHMA has been drawn up following the model in the SHMA Practice Guidance (August 2007) (the SHMA Practice Guide), it has taken account of the NPPG. Much of this broadly reflects the current NPPG and, in my view, this is a satisfactory approach in the circumstances.
92. Based on the SHMA Practice Guide methodology, the SHMA concludes that there is a need for 404 affordable dwellings per annum for the first five years. This is a significant level of need.
93. However, this is founded on various assumptions. In particular, it is assumed that a household is in need if 25% of income is spent on housing. The SHMA sensitivity tests this 'affordability threshold' at 30%, 35% and 40% of gross household income. I understand from the hearing that through discussions with housing associations the Council considers 35% to be an appropriate figure, as this is the basis on which housing associations assess whether a household can afford to rent from them. This recalculation leads to a figure of 268 homes a year for the first five years.
94. The Council points out that there are around 154 households living in privately rented accommodation. The SHMA Practice Guide assumes this is unsatisfactory. But I agree that, in reality, and whether ideal or not, the private rented sector is and is likely to remain part of the provision. So far as I can see, there is no compelling reason to discount its contribution. Taking this factor into account, the Council says that the best realistic indication of the scale of need is 114 dwellings for the first five years. I have been given no more detailed or persuasive evaluation.
95. In terms of delivery, 312 affordable homes are earmarked for the Standen site. This also forms part of the development granted permission by the Council. Clearly, it may well be that these affordable dwellings, or not all of them at least, will be built in the first five years. Even so, this is a considerable contribution.

96. Moreover, the Council's Housing Land Availability Schedule (April 2014) [Post 11.11] indicates that at 31 March 2014 the land supply included 587 affordable units which had not yet been started on site. I note that 36 are considered not deliverable. Whether these figures include the 312 at Standen, or some proportion of them, is not wholly clear. At face value, the Council's schedule suggests that sufficient affordable homes are deliverable to meet even the unadjusted SHMA Practice Guide model based level of need for the first five year period.
97. Looking forward, Key Statement H3 seeks from residential developments a contribution of 30% affordable housing. As already discussed, the Viability Study shows this level to not cause viability problems for schemes. From the Viability Study's sensitivity testing, it appears that most of the scenarios remain viable with a 40% contribution. However, comparing the 30% proposed to 40%, there is a clear difference in the residual values. I agree that the Council is right to take a cautious approach on this. The Viability Study is very 'high level' in nature. The level of 'buffer' lends significant confidence. Eroding it, as a 40% affordable housing requirement would, increases the risk of diminishing viability. The delivery of market housing could be jeopardised. From the evidence, I am of the firm view that the 30% contribution proposed strikes the most appropriate balance in this regard.
98. I note that the 30% sought through Key Statement H3 applies to sites of 10 units or more in Clitheroe and Longridge, and 5 elsewhere. This is based on data from the 2008 SHMA and consequently is not the most robustly founded area of the Plan. On this point, I concur with the general sentiment of paragraph 7.10 of the 2013 SHMA. In my view, should significant numbers of new dwellings be brought forward on sites below these thresholds, then this aspect of Key Statement H3 should be re-evaluated. This will be a matter for the Council's monitoring processes and the statutory obligation relating to review.
99. Moreover, it is clear that there are other possible sources of affordable housing delivery. The Council's Strategic Housing Service seeks to deliver affordable housing through various methods. These include: match-funding private landlord investment in renovating property where it is subsequently provided as affordable for the first five years; purchase and repair projects with Homes and Communities Agency (HCA) grant; tenancy protections schemes; and through an empty property initiative. From the Council's paper [Post 11.10], I understand that this yielded 50 new build properties in 2012/13 with a further 19 dwellings through other methods. The Council told me that, going forward, it is envisaged that affordable delivery will be roughly equally divided between new build and other routes.
100. I note the points made about the Council's track record and the doubts about the Council's ability to deliver. Any changes to grant funding, particularly through the HCA, may well have a significant impact. But, to my mind, considering all the above, the CS does what one could realistically expect to create the right conditions for affordable homes to be delivered in the Ribble Valley. In my view, on the evidence here, it would be unreasonable to demand more.
101. Given the uncertainty, it is not possible to guarantee that the need for

affordable homes will be met in full. Consequently, the promise in the Strategic Objective at paragraph 3.12 of the Plan of matching supply to need may not be deliverable. **MM1** is therefore necessary. This more accurately reflects the true position, and is deliverable.

102. The CS is not particularly discerning in relation to any spatial dimension of delivering affordable housing. It neither prioritises nor rules out any parts of the borough. In this regard, though, I am satisfied that the broad brush approach of the CS, in combination with the greater, localised detail that will be necessary in respect of sites proposed through the allocations plan, is an appropriate response.
103. Key Statement H3 says that housing for older people is a priority for the Council. It aims to ensure that 15% of new homes are for older people, half of which would be affordable accommodation. **MM30** clarifies that this requirement will apply to developments of 10 dwellings or more, which is appropriate. These proportions have not been arrived at though analysis. Rather, I understand that discussions with the Housing Forum, which includes representation from the Council, the development industry and providers, informed this factor. That is reasonable.
104. Moreover, at the hearing, the Council clarified that 'older people's housing' means dwellings that meet the Lifetime Homes standard. To ensure that the Plan is effective in this regard, I agree the Council's modification (**MM31**) is necessary. As previously mentioned, the Viability Study assumes that the Lifetime Homes standard is met for all housing. On this basis, and considering the conclusions of the Viability Study, demanding it in relation to just 15% on sites of 10 or more to provide suitable homes for older people is entirely justified.

Accommodation for Gypsies and Travellers

105. As submitted, the Plan is based on a Gypsy and Traveller Accommodation Assessment (GTAA) published in 2008. It only considers need up to 2021. As such, it is not up-to-date and does not provide evidence for the whole plan period. In short, Key Statement H4 is not founded on sufficiently robust evidence.
106. To remedy this, the Council produced a fresh GTAA in 2013, during the examination's suspension. The approach taken and methodology used are satisfactory. This revealed a need for two additional residential pitches in the period 2023 to 2028. Considering the modesty of this requirement, I agree that it is not presently necessary for the Council to commit to allocating land in this regard. To explain the situation, **MM11** is necessary.
107. Policy DMH2 sets out criteria against which applications for traveller sites will be considered. The criteria are fair and adequately consistent with national policy.

Conclusion on Issue 3

108. Considering the above, I conclude that, with the proposed main modifications put forward by the Council, the Plan's strategy for housing is justified, effective and consistent with national policy. In short, it is sound in this regard.

Issue 4 – Economic development

Whether the Plan's approach to economic development is justified, effective and consistent with national policy

Employment development (Use Classes B1, B2 and B8)

109. When the CS was submitted it was supported by evidence of employment needs dating from 2008. In short, it was not adequately up-to-date. To remedy this, the Employment Land Study Refresh (May 2013) [Post 5.3] (the ELR Refresh) was produced during the examination's suspension.
110. The ELR Refresh models five projections for economic development for the plan period. For each scenario it projects the likely need for or surplus of employment land when compared to an existing supply of 20 hectares. Model 1 is based on historic land take-up. Models 2 and 4 are employment based forecasts, the former being 'policy-off', the latter 'policy-on'. Models 3 and 5 are policy off and on respectively, but based on a labour supply forecast.
111. Both of the labour supply forecasts indicate a significant surplus of employment land. The 'policy-on' economic model indicates a shortfall. However, this is influenced by the EZ and the EZ itself will clearly deliver land (which is excluded from the general supply considered in the ELR Refresh).
112. The ELR Refresh recommends that the CS employment land needs be based on long term take-up experience, and that 8 hectares of additional land be identified for B1, B2 and B8 uses. Numerous reasons are given for this. It seems to me that allowing 'room to manoeuvre' to enable forecast structural change to occur is the crucial point. Compared to the economic based forecasts, this approach will better reflect market churn, the need for choice in the market and that even within sectors expected to decline, particularly manufacturing, some businesses will still grow and seek to expand. It will also better address the fact that Ribble Valley is a net exporter of labour.
113. Overall, I consider the ELR Refresh to be a suitably robust basis for setting the Plan's employment land requirements. Following its recommendations regarding future employment land provision is an appropriate path.
114. To this end, the Council proposes to alter Key Statement 1 (**MM18**), reducing the commitment to allocating land for employment purposes from nine hectares to eight. **MM18** also clearly sets out the locations for employment growth and development whereas, as submitted, Key Statement EC1 is less forthright. This is all consistent with the ELR Refresh, and is appropriate, justified and necessary.
115. Policy DMB1 seeks to support business growth. It does, though, allow for sites with employment potential to be put to alternative uses where certain criteria are met. These criteria are not the most stringent. That being said, they do introduce flexibility in relation to employment sites. In the context of the ELR Refresh and other evidence, and the structural change anticipated, this is an appropriate position for the CS to take.
116. Moreover, Policy DMB1 is also reasonably permissive in relation to the expansion of existing firms, as is Policy DMB2 with regard to converting rural

buildings for employment purposes. Policy DMB3 takes a similarly positive approach to recreation and tourism development. These policies, and the CS overall, does all one could realistically expect to support the rural economy.

Centres, retail and leisure

117. The term 'centres' here relates to the borough's three main centres, Clitheroe, Longridge and Whalley. Whether the Plan does enough to ensure their vitality and viability is the key question. Retail and leisure development is closely linked to this, and so I consider them together here.
118. To address some initial concerns, the Council undertook Service Centre Health Checks [Post 5.2] of the three centres during the examination's suspension. Broadly speaking, these paint a reasonably positive picture, certainly more so than the previous evidence. Whalley is noted as performing the best in terms of vitality and viability, partly at least because of its more compact nature. Longridge is considered to be doing well, but perhaps not as well as it could be. The perception of a lack of parking, environmental quality and the centre's linear form are identified as influencing factors.
119. Key Statement EC2 relates to retail and supports development in Clitheroe, Longridge and Whalley. Considering the role of these settlements and their place in the hierarchy, discussed above, this is appropriate. As submitted, though, it does not give any indication of the level of new retail development needed over the plan period.
120. During the suspension period, the Council produced a Retail Study Update (June 2013) [Post 5.5] (the Update). This examines the issue of retail needs in detail. It draws on a range of information and provides analysis of numerous factors affecting retailing, including population, the shopping hierarchy relevant to Ribble Valley, expenditure and shopping patterns. It draws on data from a telephone survey of 500 households (encompassing Ribble Valley but also including households in the north Preston and Hyndburn areas). It also takes into account the outputs of a business occupier survey which was distributed to businesses in Clitheroe, Longridge and Whalley. This is all suitable and amounts to a sound basis for planning for retail development.
121. The Update clearly sets out convenience and comparison retail capacity in Clitheroe, Longridge and Whalley to 2028. With some minor rounding up, **MM5** proposes to include these figures through a modification to Key Statement EC2, along with a commitment to allocating the land necessary. This is justified and needed for effectiveness.
122. Alongside the Update, the Council also produced a Leisure Study (June 2013) [Post 5.5]. Put simply and in summary, this audits existing commercial leisure provision, assesses the potential for future requirements and considers whether the current provision is meeting demands. It draws on the aforementioned telephone survey and examines commercial leisure trends and patterns. It also compares provision in Ribble Valley with that in Craven and Eden Districts, which it determines to be similar in terms of population and demographic profile. In short, I consider the Leisure Study to be adequately robust.

123. The Leisure Study sets out a number of conclusions. While Ribble Valley has limited commercial leisure facilities, this reflects the proximity of and good access to Blackburn and Preston. Visiting pubs, bars and restaurants is noted to be the most popular leisure activity. The Study suggests that such uses should be encouraged in Clitheroe to help sustain vitality and viability, but that in Whalley, where there is a relatively high proportion of such uses, planning applications should be carefully considered to ensure the retail function is not diminished.
124. Overall, the Leisure Study considers there to be no need for the Council to plan for additional commercial leisure floorspace over the plan period. In effect, it recommends leaving matters wholly to the market, with the Council determining applications on a case by case basis. On the evidence, I concur that this is an appropriate stance.
125. I understand from Post 8.1 that the Council intends to develop a service centre policy in the allocations plan. This is a satisfactory approach to take, and I agree that it is necessary. In particular, from the evidence noted here, consideration should be given to addressing the issues raised by the Health Check in relation to Longridge. Whether further policy response is needed to encourage pubs, bars and restaurants in Clitheroe and to more carefully control them in Whalley should also be considered.

Conclusion on Issue 4

126. Considering the above, with the main modifications put forward by the Council, I conclude that the Plan's approach to economic development is justified, effective and consistent with national policy.

Issue 5 – Sustainable development and climate change

Whether the Plan's policies concerning sustainable development and climate change are justified, effective and consistent with national policy

Renewable energy development

127. As I understand it, neither the Council nor the CS seeks to prioritise any one kind of renewable or low carbon energy development. Rather, the approach intended is more one of general support for such schemes generally, in principle at least. That is a legitimate position to take.
128. The Council has put forward a modification to Key Statement EN3 relating to renewable energy generation facilities (**MM20**). However, to say that proposals "will be considered" is to say very little at all. To ensure effectiveness and consistency with the NPPF, I have substituted the word "encouraged". Indeed, in my view, this is necessary to ensure that the Plan's approach to renewable and low carbon energy is properly articulated.
129. Policy DME5 generally supports renewable energy schemes. It does not allow them within or close to the AONB and other protected areas unless certain criteria are met. This is a reasonable approach. However, it is less clear about schemes outside these areas. The Council has put forward **MM19** to

remedy matters. This unambiguously states that outside the protected areas listed, renewable energy schemes are appropriate in principle, subject to other policies in the Plan being met. I regard this alteration as necessary for soundness.

Sustainable design

130. To address climate change, Key Statement EN3 seeks to ensure that all development meets an appropriate recognised sustainable design and construction standard where viable to do so. In my view, this is not adequately specific. The Council has put forward a modification (**MM4**). This makes it clear that the Council will apply the nationally set standards relating to the sustainability performance of buildings. This is appropriate and necessary for effectiveness.

131. As submitted, Policy DME5 "requests" that developments over certain thresholds provide at least 10% of their predicted energy requirements from decentralised and renewable or low carbon sources. The Council has proposed modifications to change this in two ways. **MM19** removes the 10% figure and the thresholds, and re-casts this part of the policy so that it requires national standards to be met. All of this is appropriate and consistent with national policy.

Conclusion on Issue 5

132. Considering the above, with the main modifications put forward by the Council, I conclude that the Plan's policies concerning sustainable development and climate change are justified, effective and consistent with national policy.

Issue 6 – Infrastructure

Whether the Plan is based on a sound assessment of infrastructure requirements and their deliverability

133. The Council has produced a Local Infrastructure Plan [Supp 6.4] (LIP). This has been based on an audit of existing infrastructure. I understand that liaison has taken place with relevant infrastructure providers to assess the additional infrastructure needs of the borough in the context of the growth anticipated in the CS. From this, it is clear that the Council has an understanding of the likely infrastructure needs. Perhaps the most critical are those related to water and sewerage, schools, highways and health.

134. A statement from United Utilities [Post 11.15] says that it may be necessary to invest at Whalley and Clitheroe Wastewater Treatment Works and in water and waste water networks throughout the borough. However, final conclusions appear yet to be reached, and this seems to be reliant on the location of sites coming forward. Similarly, the County Council, as Local Education Authority, has provided a paper [Post 11.14] setting out the number of pupil places likely to be yielded at Clitheroe, Longridge and Whalley as a result of the CS. But it appears that further detail cannot be provided until more is known about the developments involved and their phasing. I note that the paper does not mention pupil yield in other parts of the borough.

135. The Council has told me that the Highways Authority has not indicated that any particular highways improvements are necessary to facilitate the CS. This is a position which could change, though, depending on the location of sites, the scale of development on them and the possible cumulative impacts on the network. In addition, while the Council says that the CS will lead to the need for additional health provision, neither the Council nor the Health Authority is able to be more specific at this stage.
136. On the one hand, it is apparent from the LIP and other evidence that the Council is alert to the possible infrastructure issues arising from the growth anticipated in the CS. The discussions at the hearing reaffirmed this. On the other, hand, though, it is equally evident that much remains to be done. Specific infrastructure requirements must be definitively set out and agreed with the relevant providers, along with the likely costs. Funding sources must be identified and the necessary actions taken to secure the finance needed. That matters in this respect are not further progressed is less than ideal.
137. Having said all that, the relevant infrastructure providers have been engaged in the formulation of both the CS and the LIP. It is plain to me that they are alive to the infrastructure planning issues arising from the growth planned in Ribble Valley. It seems that it is just that firm commitments cannot be identified and progressed until greater detail is known. In this context, it is appropriate that the further work necessary, indicated in the preceding paragraph, be drawn up in parallel with the allocations plan. This will be necessary to demonstrate the soundness of the allocations proposed.
138. The Council has proposed a modification (**MM21**). This sets out the Council's commitment to working in partnership with infrastructure delivery agencies such as United Utilities, NHS England and the County Council. It also identifies some of the infrastructure projects anticipated. In these respects, the proposed modification bolsters the Plan's effectiveness, and sets a clearer context for the formulation of the allocations plan.
139. The Council has undertaken work in relation to open space. Audits have been undertaken of various open space types and, to some extent at least, needs have been assessed. As with other kinds of infrastructure, the question of need and delivery will have to be fully addressed through detailed evidence supporting the allocations plan, when the location of new development, particularly housing, is more precisely set out.

Conclusion on Issue 6

140. Considering the above, with the main modification put forward by the Council, I conclude that the Plan is based on an adequate assessment of infrastructure requirements. It should be regarded as sound in this respect.

Issue 7 – Development management policies

Whether the development management policies are justified, effective and consistent with national policy

141. The Council has put forward a modification (**MM22**) redrafting Policy DMG1.

In summary, the changes ensure that developments provide adequate day light and privacy, meet national standards of sustainable design and do not lead to a loss of important open spaces. Requiring that previously developed sites should be used instead of greenfield sites where this is possible gives strong encouragement to the efficient use of land. Overall, **MM22** introduces suitable alterations.

142. Among other things, Policy DMG2 relates to 'local needs housing'. **MM24** is necessary to ensure that local needs housing is properly secured for the purpose of meeting an identified local need. In addition, so that this aspect of the policy can operate effectively, I agree that the definition put forward by the Council (also under **MM24**) should be added to the glossary.
143. Policy DMH3 limits the development of new homes in the countryside and in the AONB. It allows the conversion of buildings to dwellings, and the rebuilding or replacement of existing dwellings, so long as certain criteria are met. It also allows development essential for agriculture or residential development which meets an identified local need. This is all appropriate and sufficiently consistent with the NPPF. A modification (**MM27**) is proposed introducing a functional and financial test for agricultural, forestry or other essential workers' dwellings. A definition of this test is also proposed under **MM27** which sets out criteria closely aligned to previous national policy. In the absence of any compelling evidence to the contrary, I consider this a reasonable approach to take. It will greatly assist the policy's effectiveness.
144. A number of the Plan's policies rely on the term 'major application' or 'major proposal'. **MM25** adds a definition to the glossary. This is necessary for effectiveness.

Conclusion on Issue 7

145. Considering the above, with the main modifications put forward by the Council, I conclude that the development management policies are justified, effective and consistent with national policy.

Other matters

146. Other modifications have been suggested by the Council, largely as a result of representations. While these have not been at the heart of the main issues in the examination I nonetheless, on balance, regard them as soundness matters and address them here.
147. I agree that as a principle the Plan should aim for a net enhancement in biodiversity, rather than no net loss. Consequently, **MM12** is needed.
148. Some amendments in relation to heritage assets have been put forward by the Council (**MM32, MM34 and MM26**). These affect Key Statement EN5, Policy DME4 and paragraph 3.11, and include an addition to the glossary. The modified text more closely reflects national policy than that originally submitted and should be regarded as necessary for soundness.
149. As submitted, Policy DMH4 appears to suggest that barn conversions will only

be allowed where the building is in a defined settlement. This is not the Council's intention. The remedy suggested through **MM28** is therefore necessary.

150. The Council proposes to delete all of chapter 11 of the Core Strategy, which concerns monitoring, and to replace it with a wholly new monitoring framework (**MM15**). This will introduce to the Plan indicators and measurable targets where, as submitted, there are few. This is appropriate and necessary to help effectiveness.

Assessment of Legal Compliance

151. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The CS is identified within the approved LDS May 2014 which sets out an expected adoption date of August 2014. Although the content of the CS is compliant with the LDS, some delays in its progress have occurred. I am satisfied that there is no fundamental conflict with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was originally adopted in 2007. It has been updated on two occasions since, in 2010 and 2013. Consultation has been compliant with the requirements within the SCI applicable at the time, including the consultation on the post-submission proposed 'main modification' changes (MM).
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (March 2012) sets out why AA is not necessary.
National Policy	The CS complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
Public Sector Equality Duty	The CS complies with the Duty.
2004 Act (as amended) and 2012 Regulations.	The CS complies with the Act and the Regulations.

Overall Conclusion and Recommendation

152. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

153. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Ribble Valley Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Simon Berkeley

Inspector

This report is accompanied by the Appendix containing the Main Modifications.