



Representations to Ribble Valley Core Strategy:

Further Written Statement – January 2014

On behalf of Monks (Longridge)

1. The following representations are made on behalf of our client W Monks (Longridge) who are a landowner and business operating from Longridge, and by our practice JWPC Ltd, as a local business with offices in Clitheroe, that represents many other businesses and landowners within the Ribble Valley.
2. The comments made in this document refer directly to the Inspectors Matters and Issues, pursuant to the pending Examination Hearings into the Core Strategy, and follow on from representations we have made throughout the emergence of this important Council planning document.
3. As requested by the Inspector, we have sought to include comments where relevant with their specific Issued question, and these are set out below. There are a number of questions that would appear to be directly addressed to the Council and on which we cannot comment until the Councils' case has been set out clearly, as in some instances we do not believe justification has been given in any of the previous publications. We therefore wish to be involved in roundtable discussions on these issues also, regarding Matters 1, 2 and 3.

Matter 1 – Basis for the overall approach

Issue 1.3 – Has the formulation of the Plan been based on a sound process of sustainability appraisal and testing of reasonable alternatives?

4. We have previously made representation with concern that the proposed 25% increase in the housing requirement has not been considered fully in the Sustainability Appraisal Addendum Report. The initial options process to determine the spatial strategy for housing development considered several spatial options for growth; with the preferred option being proportional growth consistent with the existing populations of the settlements. The recent increase in housing numbers from 4,000 to 5,000 however has not been considered in a spatial context, with the only issue considered in the SA being the actual number of houses, rather than where they should be located.

Matter 2 – The Strategy

Issue 2.1 – What are the strategic, cross-boundary issues of relevance to the Plan? How does the strategy address them?

5. How the Core Strategy deals with new development at Longridge is a key cross-boundary issue and one that we have previously commented upon and wish to be involved in discussions at the Hearing.
6. Following our most recent formal comments to the Core Strategy in September 2013, additional information has come to light regarding the future development at Longridge proposed in the Borough of Preston, which impacts directly on the Council's Core Strategy.
7. Preston City Council has an adopted Core Strategy and is currently working towards allocating sites for development through the Preston Local Plan 2012-26. Preston Council has been proposing a new housing allocation at a Former Depot on Whittingham Road in Longridge, which lies on the boundary with the Ribble Valley. The Publication Version of the Preston Local Plan, dated July 2013, recognises the importance of Longridge as a Key Service Centre within the Ribble Valley, and further states at paragraph 2.12 that land may be required to support the development of this Key Service Centre in the Ribble Valley. It would appear that Preston City Council consider that development at Longridge is a cross boundary issue that will help support the Ribble Valley. The allocation in the Local Plan (ref HS1.14) now

proposes 90 new homes during the plan period on a previously developed site of 3.4 hectares.

8. Previous versions of this plan had proposed an allocation in this location of 290 dwellings on 18.93 hectares of land. The most recent proposals therefore reduce Preston Councils housing allocation of development at Longridge by 200 dwellings. The plan showing the allocation and the Council's reasoning for this is explained in the Statement of Consultation Report (appendix 1), which states that 'given the strength of local feeling the Council considers that the proposed allocation would have had an unacceptable impact...and has resolved to reduce the proposed housing allocation in the Publication version Local Plan to the area of previously developed land'. We consider that the change in this proposed allocation in Preston removes the supposed need for 'the Longridge adjustment' proposed in the Ribble Valley Core Strategy and it should therefore be removed, and the 200 houses reinstated to the housing requirement for Longridge. This does not reflect our previous comments that the additional housing proposed in the recent increase can be more readily accommodated in Longridge than the other smaller settlements, and so the total amount should be increased further.
9. The Council's SHLAA shows that sufficient land is available at Longridge to more than meet this requirement, and additionally, further growth in employment at Preston East can be supported by development to the south of the town, due to direct access being available.
10. The Publication Version of the Preston Local Plan was only recently published for consultation, from September 30th until the 25th November, after the most recent representation period to the Core Strategy. We would like some clarification from the Council regarding how this proposal affects the strategy for Longridge, and how it intends to make amendments to accommodate this housing, assuming the Council were aware of this pending change through previous co-operation with Preston City Council.

Issue 2.13 – The monitoring framework includes few quantified targets or 'trigger points' for implementing contingency plans. Is it sufficiently robust? Is it sufficiently clear how progress towards delivering the

strategy's aims and objectives will be measured, and how and when any contingency plans would be triggered?

11. We consider that the Councils reliance on development at Standen, which accounts for 27% of the proposed residual housing requirement over the plan period runs a substantial risk of the five year supply of housing being unmet in future years, particularly if the number of dwellings coming forward at this substantial site falls behind. We feel this requires some form of contingency, although appreciate that the nature of the Core Strategy approach means it cannot be considered fully on a site basis unless sites are allocated.

Matter 3 – Housing

Issue 3.3 - The overall level of new housing delivery appears heavily reliant on the strategic housing site at Standen.

- a. For the avoidance of doubt, is it the intention to allocate the Standen Site on a Policies Map through the Core Strategy? If not, why not?**
- b. Is placing such reliance on one site an appropriate approach? What certainty is there that the Standen site is deliverable and will be delivered in the plan period?**
- c. What infrastructure is necessary to deliver the Standen site? What assurances are there that the necessary infrastructure will be delivered when it is needed?**
- d. Taking account of the infrastructure and other requirements, is the Standen site financially viable? What evidence is there in this respect?**
- e. Given the need for infrastructure delivery, should phasing of the Standen site be included in the Core Strategy?**
- f. Aside from housing, what other uses are anticipated on the Standen site?**

12. We have consistently objected to the proposal to bring forward a substantial expansion of Clitheroe of over 1,000 houses at the Standen site through the Core Strategy, and still maintain that insufficient justification has been provided to this approach or the need for the site in view of recent approvals and know sites within and on the edge of the town as demonstrated by the SHLAA. This argument has been enhanced in recent months by the updates to the evidence base, as more sites than ever have now been shown as developable in the Strategic Housing Land Availability Assessment (SHLAA) for Clitheroe and other towns and locations across the Borough.
13. The Council's approach has also included supporting a planning application on the site, which now benefits from a resolution to grant planning permission from the Planning Committee prior to the Examination Hearing. In our June 2012 representation to the Core Strategy we addressed concern with this approach and the potential impact on the emerging Core Strategy. At that stage it was unclear if the Council was seeking to make this site an allocation within the Core Strategy, with a defined site area, and this now forms one of the questions in the Inspectors Matters and Issues (Issue 3.3a). Although the Committee decision may yet be called in by the Secretary of State as a departure, we find this approach to be contrary to the plan-led system, particularly as the Core Strategy provides reference to the need for more work to be undertaken at the Site Allocation stage. The Council's approach is inconsistent with national policy and decisions have been made without the benefit of a proper and open discussion of the merits of this site as a strategic allocation through the correct planning policy procedures, contrary to the plan-led system approach.
14. The implication of Standen proposal is paramount to the Core Strategy, and we feel that approval of the application at this late stage in the Core Strategy process requires some steer from the Inspector during the initial exchanges of the Hearings to determine how it will be dealt with.
15. With regard to the changes sought by us through objection to this proposal, we support housing growth in and adjacent the existing settlement boundary of Clitheroe. We also agree that there is some scope for additional growth in the Standen location; however, we continue to object to the Council's approach of effectively making a strategic housing allocation in all but name. There are sufficient

sites available for housing development levels required in and around Clitheroe without the need for a strategic allocation of some 1,000 houses, especially when the site in question has no sustainability benefits that would rank above other more preferable sites in or immediately adjacent the town as borne out by the SHLAA. We would propose that reference to the Standen proposal is removed, but the overall strategy for housing growth at Clitheroe remains largely the same, with site allocations to be determined in future development plan documents as originally intended.

Issue 3.4 - The table at paragraph 4.11 indicates the number of new homes for each of the three principal settlements on an individual basis, and gives a figure for the 'other settlements' combined.

- a. Is this the spatial distribution of housing sought by the Plan?**
- b. If so, should the Plan be more robust in explaining that this is a proactive strategy and give an unambiguous commitment to delivering this distribution?**
- c. How has the proportional split between the settlements been arrived at? What justifies this distribution?**
- d. What is the justification for the 'Longridge adjustment'? Is the proposed reapportionment across the 'other settlements' (excluding Clitheroe and Whalley) the most appropriate course?**
- e. Should the Plan be more specific about the number of new houses anticipated at each of the 'other settlements'? Is it sufficiently clear to properly steer and direct the allocation of land through the Housing and Economic DPD?**
- f. Which 'other settlements' are referred to? Have their relative sustainability credentials been taken into account?**

16. Throughout our responses to the document, we have made the case that the majority of new housing development should be located within the two main settlements of Clitheroe and Longridge, and that other settlements on the periphery of the Borough, such as Wilpshire, Mellor Brook and Read/Simonstone, can also provide for additional housing growth due to them being sustainable locations in the context of adjacent Boroughs, rather than them being considered villages distant from the Key Town of Clitheroe in the Ribble Valley.
17. Insufficient justification has been given without direct reference to the SHLAA in the context of the settlements. To a large extent the Council is seeking to 'park' the issue of distribution of housing to the 'other settlements', but this itself requires some detail regarding those locations that may be more suitable for development. There are several locations that are on the periphery of the Boroughs boundary, but which benefit from sustainable location credentials due to their proximity to other towns outside of the Ribble Valley. For example, Wilpshire is effectively part of Ramsgreave and Blackburn, and Manchester can be reached directly from the local train station. In addition, settlements like Read and Simonstone and Mellor/Mellor Brook are located close to major employers that would be easily accessible.
18. With regard to question d) we consider that the Longridge adjustment has never fully been justified by the Council in published reports. The only reference to it in the Core Strategy appears to be in the residual table, which states that it reflects anticipated development in Preston Borough at Longridge. On that basis, and as outlined above in Matter 2, we consider that the recent change in approach to the Preston Local Plan requires an additional 200 dwellings to be provided within the Ribble Valley requirement at Longridge, effectively removing the need for an adjustment to be made.

Preston Local Plan 2012-26

Site Allocations and Development Management
Policies Development Plan Document

Statement of Consultation
Regulation 22 (1) (c) report

July 2013

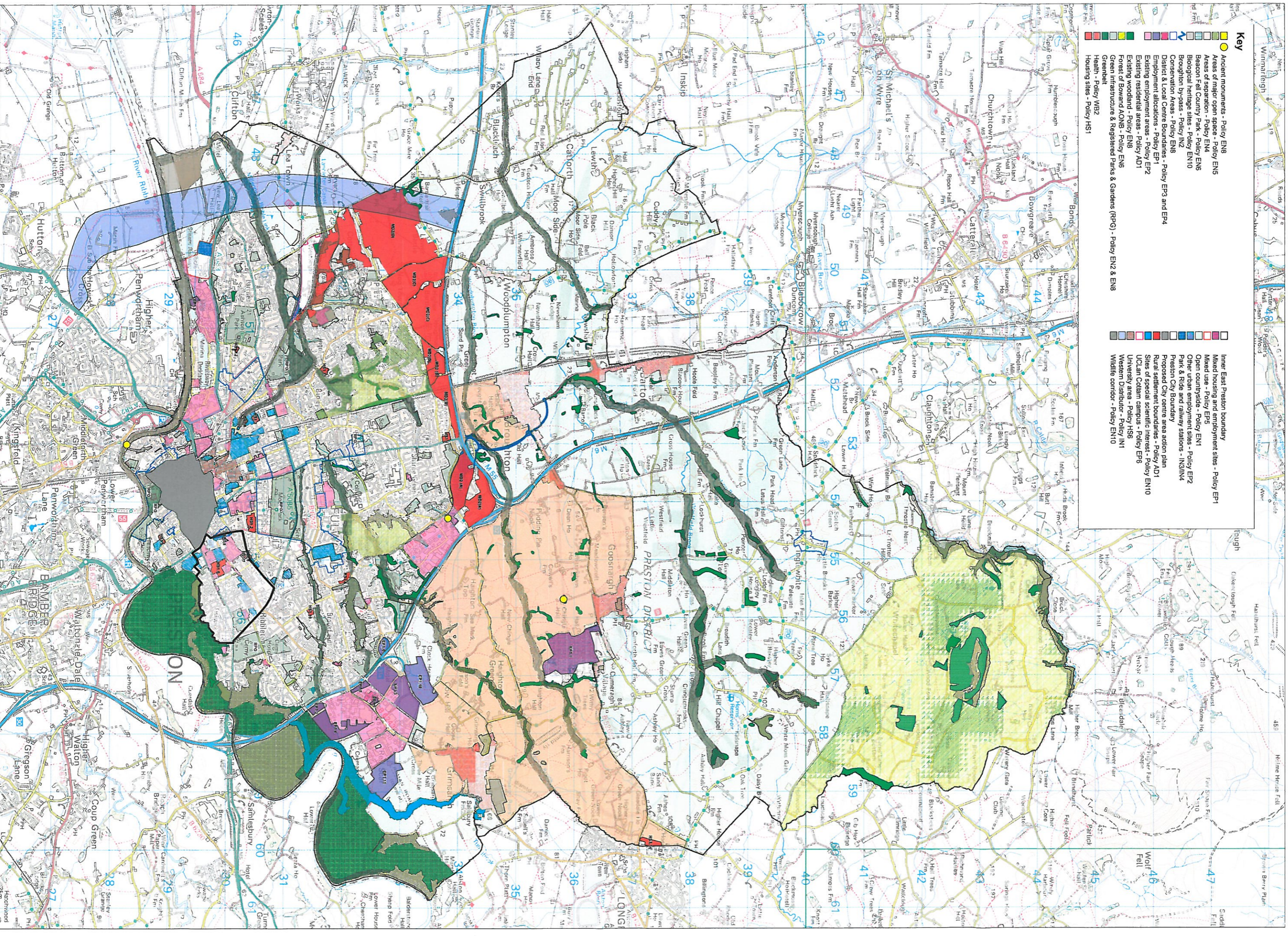


example, impacts on the area's ecology or archaeology could be mitigated. However, the main impediment to the site's development is the lack of a satisfactory access and it is difficult to see how this could be overcome. This means that, in the Council's view, the site is not developable. This allocation has not been carried forward into the Publication version of the Local Plan.

- 3.28 **Site HS1.25 – Land South of Stoney Butts / North of Riversway:** 117 comments were made in relation to this site. The issues raised were that the site is within Flood Zone 2; ground conditions are unsuitable (due to the depth of peat; local infrastructure is inadequate; the residential roads leading to the site are narrow and unsuitable (particularly for construction traffic) and on-street parking is prevalent in places; loss of green infrastructure; and effect on wildlife.
- 3.29 **Council's Response:** The majority of issues raised could, potentially, be addressed at the planning application stage, and mitigation measures could be agreed, for example, in relation to wildlife (although the site has no specific designation). However, the very constricted nature of the local road network means that it is difficult to see how a satisfactory access to the site could be achieved (particularly for large construction vehicles). In addition, the ground conditions also call into question the viability of developing the site. For these reasons, the Council has not included the site as an allocation in the Publication version of the Local Plan.
- 3.30 **Site HS1.26 – Land off Whittingham Road, Whittingham (adj. to Longridge):** This allocation attracted 164 comments. The issues raised included the lack of road infrastructure capacity (particularly in relation to the Broughton crossroads); the lack of services and employment in the area; the relationship to Core Strategy Policy 1 and development at Longridge; the effect of development on the character of the area and on the environment; and the lack of demand or need for the proposed new housing. The promoter of the site submitted that its potential capacity is 420 units, significantly greater than the 280 units estimated by the Council.
- 3.31 **Council's Response:** Duplicate planning applications have been submitted for part of the site for up to 200 dwellings and 929 sq m of offices. One application (06/2011/0344) was determined at appeal (August 2012). The Inspector dismissed the appeal on highways grounds citing the "extreme" problems in relation to Broughton cross roads and A6/M55 junction. A second application remains (as of August 2013) to be determined, whilst discussions are ongoing with the highways authority. Progress is being made in relation to relieving congestion along the A6 corridor through proposals contained in the Central Lancashire Highways and Transport Masterplan with improvement works underway at junction 1 of the M55.
- 3.32 Many of the other issues raised about the suitability of the site were considered by the appeal Inspector. He did not consider any of them to be insurmountable and therefore did not include them in his reasons for refusal. Core Strategy Policy 1 acknowledges that Longridge is a Key Service Centre serving part of Preston, and that some development within Preston's administrative area may be required.
- 3.33 Nevertheless, given the strength of local feeling the Council considers that the proposed allocation would have had an unacceptable impact on the character of this part of Whittingham. It has resolved to reduce the proposed housing allocation in the Publication version Local Plan to the area of previously

developed land (a depot) which is 3.31 has in size with an estimated capacity of 90 units.

- 3.34 **Site EP1.10 – Preston East Junction 31A, M6:** This allocation for employment uses attracted 121 comments. These included; the affect that development would have on the existing tenants and their farming/livery business; possible alternative sites to allocate; the need for further allocations; the inclusion of the site within the Area of Separation; the loss of countryside, woodland, wildlife and recreational opportunities; impact on local roads.
- 3.35 Council's Response: The site belongs to, and is proposed by, the Homes and Communities Agency (HCA). It has advised that technical and environmental work is being carried out and that this will inform a comprehensive development brief and masterplan. This will address the relationship with adjacent land uses, including the open countryside and woodland. As regards the existing business, this is a matter which the HCA will have to resolve with its tenants within the terms of the tenancy. The need to allocate the site stems from the requirement to identify employment land set out in Core Strategy Policy 9. Relatively few site suggestions were put forward for employment uses therefore the alternative options are limited. There is no justification to extend the Area of Separation designation over this site as it would not directly reduce the risk of Grimsargh merging with either Preston or Goosnargh/Whittingham.
- 3.36 **Site EP1.11 – Roman Road Farm:** This proposed employment allocations elicited 21 comments. The issues raised included the potential impact on the adjacent SSS1; the possibility of extending the site; and the archaeological value of the site.
- 3.37 Council's Response: The site is sensitive in that it is adjacent to the SSSI. This is why the Plan refers to the importance of a development brief / masterplan to be prepared to show that development can take place without harm to the SSSI. Similarly, the brief / masterplan will need to ensure that any archaeological issues are appropriately addressed. The possibility of extending the site boundary has been considered and dismissed because there is no need to allocate any further employment land at this time.
- 3.38 **Chapter 8- Protecting and Enhancing the Built and Natural Environment:** 18 comments were submitted in relation to omissions from this chapter. The main issues were the lack of an appropriate policy dealing with biodiversity and ecological networks that would satisfy the Framework; the lack of evidence that proposed allocations have been assessed against the most up to date evidence; and the omission of any reference to the need to consider land quality in development management.
- 3.39 Council's Response: The Council has sought the advice of the Lancashire Wildlife Trust and has included a new policy in the Publication Local Plan on biodiversity and nature conservation. Information was obtained from the Lancashire Environment Record Network and has been assessed against the proposed allocations. A new policy has been introduced to ensure due consideration is given to land quality (contamination) in making development management decisions.
- 3.40 **Policy EN2 – Areas of Separation:** 19 comments were made in relation to this policy. A number of locations were suggested as suitable for designation as Areas of Separation. This included land to the north of Hoyles Lane (in North



- Key**
- Ancient monuments - Policy EN8
 - Areas of major open space - Policy EN5
 - Areas of separation - Policy EN4
 - Beacon Fell Country Park - Policy EN6
 - Biological heritage sites - Policy EN10
 - Broughton-by-pass - Policy IN2
 - Conservation Areas - Policy EN8
 - District & Local Centre Boundaries - Policy EP3 and EP4
 - Employment allocations - Policy EP1
 - Existing employment areas - Policy EP2
 - Existing residential areas - Policy AD1
 - Existing woodland - Policy EN8
 - Forest of Bowland AONB - Policy EN6
 - Green Infrastructure & Registered Parks & Gardens (RPG) - Policy EN2 & EN8
 - Greenbelt
 - Health - Policy WB2
 - Housing sites - Policy HS1
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- Inner East Preston boundary
 - Mixed housing and employment sites - Policy EP1
 - Mixed use - Policy EP6
 - Open countryside - Policy EN1
 - Other urban employment sites - Policy EP2
 - Park & Ride and railway stations - IN3/IN4
 - Preston City Boundary
 - Proposed City Centre area action plan
 - Rural settlement boundaries - Policy AD1
 - Sites of special scientific interest - Policy EN10
 - University area - Policy HS6
 - Western Distributor - Policy IN1
 - Middle corridor - Policy EN10