



HALLAM LAND MANAGEMENT LTD

RIBBLE VALLEY CORE STRATEGY

EXAMINATION HEARING STATEMENT

BASIS FOR THE OVERALL APPROACH (MATTER 1)

Questions 1.1 to 1.5

Date: 6th January 2014

Pegasus Reference: ST/MAN.0139/R001v2

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1. INTRODUCTION

- 1.1 This statement has been prepared on behalf of Hallam Land Management Ltd (HLM) for consideration at the Ribble Valley Local Plan: Core Strategy Examination. It relates to 'Matter 1- Basis for the Overall Approach' and the questions raised by the Inspector in relation to this topic and in particular the Council's 'Duty to Co-operate'.
- 1.2 This statement also supports HLM's representations to the Core Strategy Proposed Submission consultation period, which include Pegasus Covering Letter (L001v2) dated 18th September 2013 and various plans and photographs of HLM's land interest at Langho.
- 1.3 Separate Hearing Statements have also been prepared for Matters 2 and 3 of the Examination process. In order to reduce duplication, cross reference to our responses within these statements may also be undertaken.

2. KEY QUESTIONS FOR MATTER 1

- 2.1 The Inspector's key questions on Matter 1 are addressed below.

Q1.1 - Overall, has the plan been prepared in accordance with the legal requirements, including the 'duty to cooperate' imposed by Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended)?

- 2.2 The Council's compliance statement with regards the duty to co-operate is set out within post submission document 3.3 'Duty to Co-operate'. It provides detailed minutes, letters and emails regarding the consultation undertaken with surrounding bodies. However, very little information is provided on what outcomes and actions have been identified as part of this process. Moreover, there is no analysis of how surrounding Local Authorities are meeting their own development needs, including an assessment of past performance.
- 2.3 Section 33A(2) of the Planning and Compulsory Purchase Act 2004 confirms the duty requires the authority:
- a) *'To engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and*
 - b) *To have regard to activities of a person within subsection (9) so far as they are relevant to activities in subsection (3).'*
- 2.4 The recent draft National Planning Practice Guidance (NPPG) on this issue also states *'it is unlikely that this (the duty) can be satisfied by consultation alone'* and that *'inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others'*.
- 2.5 This position has been re-iterated in a number of Local Plan Inspector Reports such as Kirklees, where the Inspector stated:

'The 'duty to co-operate' requires more than consultation with adjacent councils and specified bodies. It requires a co-ordinated process for securing sustainable development and resolving strategic issues.'

2.6 In particular, HLM do not consider the Council have given full consideration to the needs of surrounding authorities during the preparation of the Core Strategy in relation to meeting neighbouring housing needs, and in particular stemming from Blackburn with Darwen.

2.7 As set out in the Duty to Co-operate Statement, correspondence from Blackburn with Darwen Council dated 14th June 2012 is provided. This is clearly now out of date and not related to the new Ribble Valley Core Strategy housing numbers. Notwithstanding this, it highlights some of the findings of the previous NLP Headroom housing assessment and in particular it notes that:

'Ribble Valley is highly dependent on net inward migration to maintain a stable and growing population; and also that practically it would not be possible to stop in-migration even if this were desired. It is therefore appropriate for the housing target to continue to assume a significant level of net in-migration.'

2.8 However, at the time, Blackburn with Darwen Council confirmed it was supportive of the previous 200 per annum housing target in that this figure assumes some decline in the rate of net in-migration and that this would:

'increase the likelihood of would-be in-migrants considering other nearby areas, including parts of Blackburn with Darwen.'

2.9 HLM do not consider this particular comment by Blackburn and Darwen to the previous Ribble Valley strategy housing requirement was particular helpful or constructive. In particular, it failed to highlight that since 2003, Blackburn with Darwen had consistently failed to meet its own previous housing target of 489 dwelling per annum (set by the revoked RSS). This shortfall was considerable by 2011 (over 3,000 dwellings) and led to an increased average annual requirement of 625 dwellings within the more recently adopted Blackburn with Darwen Core Strategy.

2.10 Since 2011, Blackburn with Darwen completed 290 dwellings, with just 70 in 2011/12 and 220 in 2012/13¹. These figures do not include any demolitions or loss of dwellings and are therefore not net figures. Even so, it remains clear that the patterns of continued under delivery of housing within Blackburn continues to be an issue.

2.11 This could be down to the fact that Blackburn with Darwen has persisted with a targeted urban area approach to meeting development needs through the Core Strategy, yet these urban areas are poor housing market areas and therefore not attractive to the market. Furthermore, Blackburn with Darwen has also yet to produce their Site Allocations Development Plan Document, which was originally due to be adopted by November 2013 according to their 2010

¹ Table 253 - <https://www.gov.uk/government/statistical-data-sets/live-tables-on-house-building>

Local Development Scheme and is now unlikely to be adopted until early/mid 2015. Either way, this would suggest that the continued under-performance of housing delivery may continue to persist within Blackburn and Darwen in the near future.

2.12 When the above position is coupled with the fact that Blackburn is highly constrained by Green Belt, it would lead to an early supposition that a wider strategy may be required to ensure the housing needs stemming from the Blackburn housing market area are sufficiently met.

2.13 Whilst Ribble Valley might argue that it is unfair to require the authority to assess the performance and needs arising from neighbouring authorities, this is precisely the objective of the Duty to Co-operate.

2.14 The importance of dealing with regional under-delivery was recently raised by the Inspector of the Mid Sussex Local Plan where the council had failed to take into account planned levels of provision by adjoining authorities. The Inspector identifies (with regards to housing provision);

'Whilst I understand it is not always easy to take an active approach in terms of considering the needs of other local planning authorities and also that localism has a role to play in any deliberations, those factors should not be seen as a reason to take a back seat and rely on others to seek solutions to cross-boundary problems' (Inspectors final conclusions on the Duty to Co-operate, 2nd December 2013).

2.15 Moreover, past housing completion rates are freely and easily accessible from the Government and are available online. The previous poor performance of Blackburn was also reported within the adopted Blackburn with Darwen Core Strategy². Ribble Valley would have also been fully aware of the extent of Green Belt surrounding Blackburn. As such, there is limited excuse to not be aware of the potential scenario where Blackburn may not be capable of meeting its own needs.

2.16 This position was partly highlighted in Policies CS1 (Targeted Development) and CS5 (Locations for New Housing) of the Blackburn with Darwen Core Strategy. Whilst the emphasis of the strategy is to target growth towards the urban areas of Blackburn and Darwen, both policies also state that over the lifetime of the Core Strategy, small urban extensions will need to take place and should insufficient land not be available outside of the Green Belt there may be a need to alter Green Belt boundaries.

2.17 The need to look beyond the existing urban area to meet housing needs in Blackburn is becoming increasingly apparent. However, as set out on the Blackburn with Darwen Unitary Development Plan (UDP), which was adopted in 2006, Blackburn itself is largely encapsulated by Green Belt. The Green Belt also encapsulates the settlement of Wilpshire and surrounds the southern urban boundaries of settlements such as Mellor, Langho and Whalley, all located within Ribble Valley. Green Belt land is also predominant to the east of Blackburn, where the Borough boundary

² See paragraphs 8.14 and 8.15 of the Blackburn with Darwen Core Strategy

adjoins Hyndburn. The only exceptions are a number of allocated employment land parcels identified on the Hyndburn Local Plan Proposals Map.

2.18 Baring in mind the continued desire to protect Green Belt Land as set out in the NPPF, options for growth outside of Blackburn’s existing urban area are severely restricted.

2.19 Indeed, the availability of safeguarded land identified around Blackburn are limited. Only one small safeguarded land site (Site RA2/4 – Parsonage Road, Blackburn) located to the northeast of Blackburn was identified in the previous Blackburn with Darwen UDP. This site is no more than 3.26 ha and therefore capable of delivering approximately 98 dwellings (assuming 30 dph).

2.20 Other safeguarded land sites all relate to the smaller market town of Darwen located to the south of Blackburn and include:

- RA2/1- Cranberry Lane / Kirkhams Farm, Darwen 7.9 ha
- RA2/2 – Roman Road/Marsh House Lane/Elison Fold, Darwen 26.9 ha
- RA2/3 – Pole Lane, Darwen 5.5 ha

2.21 Assuming a development density of 30 dwellings per ha, these three sites could achieve 1,209 dwellings. Safeguarded land identified in the UDP could therefore potentially deliver 1,307 dwellings. However, this represents just **14%** of Blackburn with Darwen’s housing requirement (total of 9,365 between 2011 – 2026 as set out in Policy CS6 of the Core Strategy) and the vast majority is focused towards Darwen despite Blackburn being the key settlement within the area.

2.22 The above position would have indicated at an early stages of the Ribble Valley Core Strategy production that delivering future housing requirements for Blackburn with Darwen could be reliant on looking at settlements within Ribble Valley.

2.23 This position has since been backed up by Blackburn with Darwen Council’s more recent correspondence to Ribble Valley dated 2nd August 2013 (set out in Post Submission document 5.13.1), which highlights there are a number of cross boundary issues that are deemed to be important including:

- Green Belt
- Housing Provision
- Infrastructure Provision including rail links
- Samlesbury Enterprise Zone; and
- Gypsy and travellers

2.24 Whilst the correspondence is directed towards Ribble Valley in relation to the emerging Blackburn with Darwen Site Allocations and Development Management Policies DPD, it confirms joint working is ongoing and therefore not complete.

- 2.25 A draft version of the Blackburn with Darwen Site Allocations Document was issued for Cabinet approval on 7th November and is expected to be formally released by the end of January 2014 for consultation and adoption is expected to take place by mid 2015. Within that document, 18 specific housing site allocations have been put forward, some of which include the aforementioned safeguarded land sites. The number of homes that can be delivered on these 18 sites adds up to 3,340 dwellings. This is clearly far short of the overall target of 9,365 and only represents 36% of Blackburn's overall housing target.
- 2.26 Appendix A and B of the supporting officers report confirm that the 15 year land supply will amount to 9,396 dwellings. However, this does not appear to correlate with the Site Allocations document is made up of a large number of unspecified sites and it is also confirmed that 810³ dwellings will need to be delivered within Blackburn's Green Belt. We strongly suspect further scrutiny of this document would reveal a higher proportion of dwellings will not be able to be accommodated within the existing urban area and land outside the urban area but not Green Belt land, thereby resulting in the potential threat of greater Green Belt loss if suitable alternatives cannot be found (including options located within Ribble Valley).
- 2.27 It is therefore clear that the issues set out by Blackburn with Darwen in their latest correspondence to Ribble Valley will be equally relevant to the production of Ribble Valley Core Strategy and these issues require continued dialog and consideration. However, there is no evidence to suggest these cross boundary issues have been properly considered during the preparation of the Ribble Valley Core Strategy. In light of this, Section 33(A) of the Planning and Compulsory Purchase Act has not been satisfied and the Core Strategy is therefore unsound.

Q1.2 - Has the plan been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the Regulations?

Q1.3 - Has the formulation of the Plan been based on a sound process of sustainability appraisal and testing of reasonable alternatives?

Q1.4 - How have the possible effects on European wildlife sites influenced the Plan and the assessment of alternative options?

Q1.5 - How has the Plan been influenced by the Sustainable Community Strategy for the district?

- 2.28 No comment on the above questions.

³ 120 dwellings in Appendix A + 690 dwellings in Appendix B of 7th November 2013 Officers Report on Blackburn with Darwen Site Allocations and Development Management Policies Plan



HALLAM LAND MANAGEMENT LTD

RIBBLE VALLEY CORE STRATEGY

EXAMINATION HEARING STATEMENT

THE STRATEGY (MATTER 2)

Questions 2.1 to 2.13

Date: 6th January 2014

Pegasus Reference: ST/MAN.0139/R002v2

Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Manchester

Planning | Environmental | Retail | Urban Design | Renewables | Landscape Design | Graphic Design |
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1. INTRODUCTION

- 1.1 This statement has been prepared on behalf of Hallam Land Management Ltd (HLM) for consideration at the Ribble Valley Local Plan: Core Strategy Examination. It relates to 'Matter 2-The Strategy' and the questions raised by the Inspector in relation to this topic.
- 1.2 This statement also supports HLM's representations to the Core Strategy Proposed Submission consultation period, which include Pegasus Covering Letter (L001v2) dated 18th September 2013 and various plans and photographs of HLM's land interest at Langho.
- 1.3 Separate Hearing Statements have also been prepared for Matters 1 and 3 of the Examination process. In order to reduce duplication, cross reference to our responses within these statements may also be undertaken.
- 1.4 This paper is also supported by two plans including:
- Appendix 1 – Borough Settlement Plan / Key Diagram
 - Appendix 2 – Langho Service Plan

2. KEY QUESTIONS FOR MATTER 2 – THE STRATEGY

Q2.1 - What are the strategic, cross-boundary issues of relevance to the Plan? How does the strategy address them?

- 2.2 HLM consider the key strategic cross boundary issues for the Core Strategy include:
- Development needs arising from Preston City Region and Blackburn with Darwen in particular, and possibly Hyndburn, Burnley and Pendle.
 - Green Belt issues particularly in relation to development needs arising from Blackburn with Darwen;
 - Public transport provision and existing commuting patterns, including the railway connection between Blackburn and the Ribble Valley settlements of Wilpshire, Langho, Whalley and Clitheroe.
- 2.3 These issues are reflected in Blackburn with Darwen's correspondence dated 2nd August 2013 and set out in Post Submission document 5.13.1. As expressed within our Hearing Statement relating to Matter 1 and the Duty to Co-operate, HLM considers the Core Strategy has limited regard to these issues and is rendered unsound because of this.

Q2.2 - Will the Plan deliver the homes, jobs and services required to meet the needs of the whole borough? How have needs in other adjacent authority areas been taken into account?

- 2.4 HLM do not consider the development needs of Blackburn with Darwen Borough have been addressed in the Core Strategy. HLM's key arguments in this respect are set out in the Hearing

Statement relating to Matter 1 and the Duty to Co-operate. These issues should be equally noted for this matter and specific question.

Q2.3 - The Plan's development strategy is set out in Key Statement DS1. It focuses new housing, retail and leisure in Clitheroe, Longridge and Whalley and new economic development at the Barrow Enterprise site and Samlesbury Enterprise Zone. In broad terms, is this the most appropriate spatial strategy?

- 2.5 HLM accept that Clitheroe, Longridge and Whalley are the main service centres and understands the logic in seeking to direct most housing, retail and leisure development to these locations. Clitheroe is clearly the largest settlement within the Borough and has a wide range of services and employment opportunities. Longridge is also a large settlement with a range of services albeit it lacks good public transport links to larger urban centres located within and outside of the Borough. Whalley is not a particularly large settlement when compared to Clitheroe and Longridge but it is acknowledged that it is an historic centre, with a range of services, and within 15 minutes from Blackburn and 10 minutes from Clitheroe by train.
- 2.6 However, in terms of defining the spatial strategy further consideration should have also been given to settlements with good existing and regular public transport provision to surrounding larger urban centres with the view that such settlements have the potential to promote more sustainable commuting patterns that will inevitably take place between Ribble Valley and settlements such as Preston and Blackburn.
- 2.7 In particular, Wilpshire and Langho are located on the railway line between Clitheroe and Blackburn, with Langho being within a 10 minute train journey to Blackburn, 15 minutes to Clitheroe and just 4 minutes to Whalley. The same service also provides direct access to Bolton, Salford and Manchester.
- 2.8 Bearing in mind Wilpshire and Langho are also the next two largest settlements after Longridge and are larger than Whalley with populations over 2,300, the failure to consider these settlements as key development locations is considered to be a major oversight.
- 2.9 The Spatial Strategy should also confirm at an early stage, areas where development will be restrained including the Forest of Bowland AONB and areas of Green Belt (assuming development needs can be met without utilising greenfield land within these areas). It is noted that this is partly addressed within the additional text within Key Statement DS1, but without any visual overview or description of how this affects the settlements identified in Key Statement DS1, it is unclear to the reader as to how the development strategy translates in geographical terms.

Q2.4 - What is the justification for the settlement hierarchy proposed? What evidence/reasoning led to the identification of Clitheroe, Longridge and Whalley as the primary centres? What alternatives were considered, and why were they rejected?

- 2.10 HLM note the Settlement Hierarchy Assessment carried out by the Council and largely agree with the conclusions that Clitheroe, Longridge and Whalley are the primary centres within the Borough albeit there are evident gulfs between these three centres in terms of their population sizes and

range of services. Notwithstanding this, this position is largely reflected in the amount of development apportioned to each of the three towns (assuming the delivery of the large strategic site known as 'Lower Standen' meets Clitheroe's housing needs).

- 2.11 HLM's primary concern relates to the extensive grouping of smaller settlements below the three primary centres and evidence that demonstrates the settlement of Langho arguably sits within its own category in between the principle settlements and the vast majority of the other settlements. We address this point in more detail under the following question.

Q2.5 - The Council's proposed modifications include adding a list of other defined settlements to Key Statement DS1. What criteria have been used to draw up this list?

- 2.12 HLM note the Settlement Hierarchy Assessment (December 2008) carried out by the Council and have assumed it is this piece of work that has led to the identification of the defined 'other settlements' within Key Statement DS1.

Q2.6 - Is the settlement hierarchy based on robust evidence and sound reasoning? Will this hierarchy lead to the most sustainable spatial distribution of new development? In this respect, are the conclusions of the Sustainability Appraisal founded on robust evidence and sound reasoning?

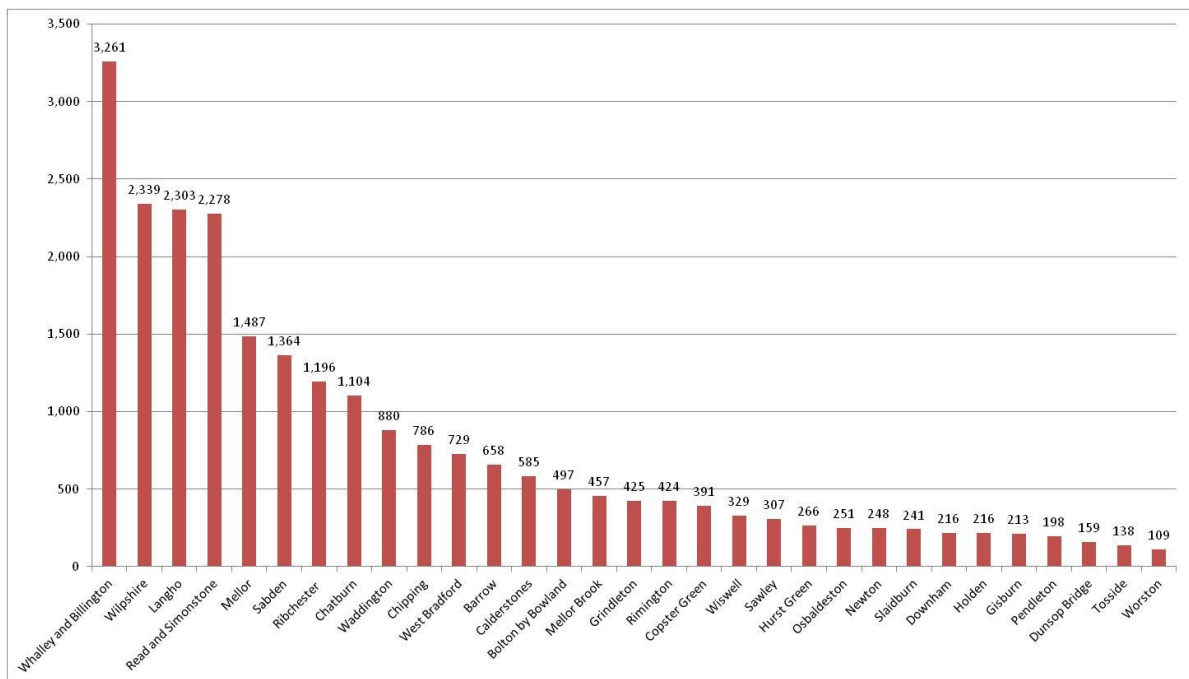
- 2.13 HLM largely agree with the various criteria used to assess the other settlements within Key Statement DS1. However, HLM dispute the conclusions reached in the Settlement Hierarchy Assessment and Key Statement DS1 which groups a significant number of settlements together.
- 2.14 The main criticism in relation to the various criteria and scoring system used within the assessment relates to the data in Table 12 and the scores provided in relation to the accessibility of each settlement to key services centres by public transport. Scores are only given in relation to settlements located within the Borough despite the proximity to the major cities and towns of Preston, Blackburn and Burnley. If this had been carried out, Langho's score in particular would have been elevated considerably and would have most likely been the top scoring settlement within the Borough in terms of accessibility by public transport.
- 2.15 Langho already obtained the fourth highest score (as presented in Chart 1 of the Settlement Hierarchy Assessment), which could have been further elevated and allowed for greater distinction/step change between the next best scoring settlement of Mellor.
- 2.16 HLM also dispute the conclusions reached in the Settlement Hierarchy Assessment and Key Statement DS1 which groups a significant number of settlements together. The key reasoning for this provided by the Council is that there is no significant step change between the various settlements and any subdivision based on the scoring used would be somewhat arbitrary.
- 2.17 This is despite the fact that some settlements are clearly much larger and have a greater number of services. Indeed, some of the settlements are little more than small rural hamlets whilst others are large villages. Indeed, whilst the Assessment looks at population sizes and other factors

including economic activity, commuting patterns, etc, this information is not effectively combined with the main scoring system within the document which principally relates to access to services.

2.18 To suggest that some of the settlements, which have a population of less than 200 and score poorly in the scoring criteria in relation to access to services, are similar to much larger villages with populations of over 2,000 and access to a range of much wider services is considered to be too simplistic and ignores the important role some of the larger villages are able to play in meeting the Borough’s future development needs.

2.19 A slight alteration to the presentation of the Council’s population figures helps to demonstrate a clear step change in the size of a number of the settlements.

Chart A – Settlement Population Size



2.20 Chart A above depicts the population sizes for each of the other settlements but omits Clitheroe (c.15,000) and Longridge (c.7,000). The figures are taken direct from the Settlement Hierarchy Assessment but the population of Whalley and Billington are combined. This is on the basis that despite the River Calder running between the settlements, the urban area essentially reads as one when driving through the settlements. In addition, Billington contains a high school which will serve the immediate surrounding population including those in Whalley.

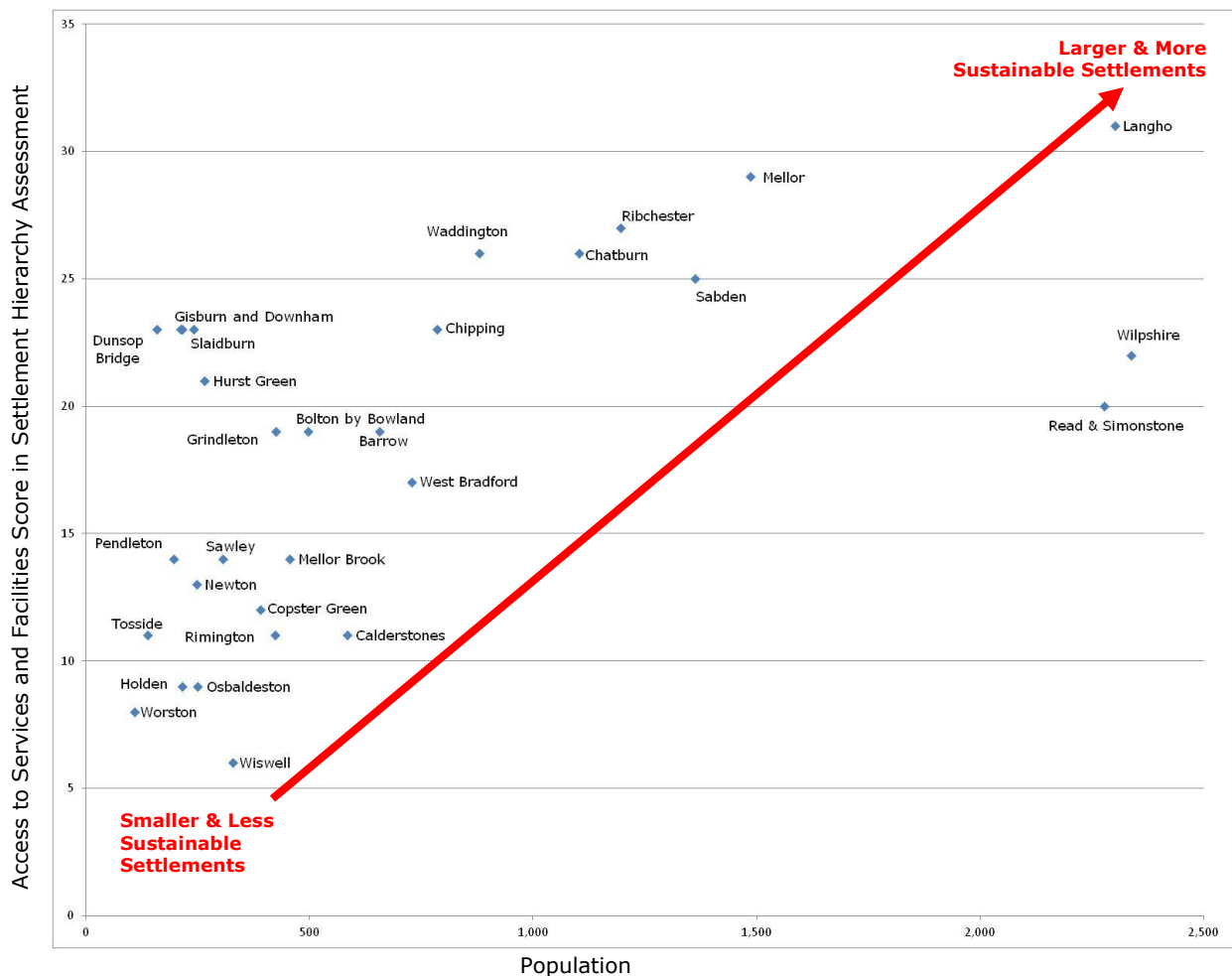
2.21 By combining the Whalley and Billington populations, this also provides greater justification for including Whalley as a key service centre (particular bearing in mind the sole population of Whalley is actually less than Wilpshire, Langho and Read & Simonstone). However, by applying this slight alteration, the chart clearly demonstrates the settlements of Wilpshire, Langho and Read & Simonstone have the largest populations within the ‘other settlement’ group. This is

reflected by the size of their urban areas and helps to illustrate a clear step change to the next largest settlement of Mellor, after which there is a more graded change in population size.

2.22 Whilst population size in itself does not necessarily mean the settlement is more appropriate to accommodate growth over another settlement, it follows that larger settlements are likely to generate a higher proportion of local housing needs, and may be capable of better sustaining other services and facilities where these might be currently lacking through the release of more land for development.

2.23 It is noted by HLM that Chart 1 in the Settlement Hierarchy Assessment illustrates Wilpshire and Simonstone & Read score poorly in terms of other criteria and fall below settlements such as Mellor, Ribchester, etc. As such, HLM have some sympathy with the potentially difficulty in separating out some of the settlements from the overall group. However, as presented in Chart B below, if the population figures and scores derived from access to services and facilities assessment were combined, it is clear that Langho would represent the largest, most sustainable 'other settlement' within the current category and can be seen to be distinguished very separately from the other settlements. Therefore Langho is capable of being defined as a Key Settlement in its own right or perhaps akin to Whalley.

Chart B – Population Size and Settlement Hierarchy Score



- 2.24 The Services Plan at **Appendix 2** illustrates the range of facilities within Langho, the accessible location of the train station and various bus stops that run through the town. The few services that Langho is lacking (such as a children’s play area, sports facilities, library, dentist, additional employment/business space, etc) could all be delivered through sustainable development at Langho and within HLM’s current land interest adjacent to the railway station and A59, which represent the key transport infrastructure running through the Borough. In delivering these services, Langho would become a further improved and increasingly sustainable settlement, and would clearly cement its position as a key service centre.
- 2.25 In moving forward HLM would support the following options for the settlement hierarchy:
- a) Langho to be identified as a Key Service Centre alongside Clitheroe, Longridge and Whalley albeit it is recognised there is a significant gap between Langho and Clitheroe and Longridge.
 - b) Langho to be identified alongside Whalley as a ‘Large Service Village’ underneath the Larger Towns of Clitheroe and Longridge but above all other settlements.
 - c) Langho to be identified as a ‘Large Service Village’ underneath the Key Service Centres of Clitheroe, Longridge and Whalley and above all the other settlements.
- 2.26 A further alternative would be for the Core Strategy to provide more description on each of the other settlements highlighting their population, range of services, access to public transport, geographical location and restriction imposed by either Green Belt, AONB or other conservation designations so as to provide an early indication as to whether the settlement is likely to be suitable for reasonable growth or not.

Q2.7 - Overall, is the distribution of development sought the most appropriate strategy, and what alternatives have been rejected?

- 2.27 As previously set out and based on the characteristics of the settlement, it is considered Langho is well placed to meet a reasonable proportion of the Core Strategy’s development needs given the size of the settlement, its range of available services and good access to public transport. The settlement’s services are all depicted on the services plan included at Appendix 1. Coupled with the availability of land under the control of HLM and its suitability for development, it is considered that the settlement should be identified as a strategic development location.
- 2.28 It is considered that a high proportion of the dwellings targeted to the group of other settlements under Key Statement DS1 could be suitably delivered within Langho. The settlement is also excellently placed to assist in meeting the development needs of Blackburn and Darwen should it be necessary for Ribble Valley to contribute to meeting such needs.

Q2.8 - What is the strategy’s intention in relation to the Forest of Bowland AONB? Is new development in the AONB anticipated? What is the strategic approach here, and is the Plan sufficiently clear?

2.29 HLM would support a restricted level of development within the AONB in line with the protection afforded to such areas within the NPPF. There is sufficient land available outside of the AONB to meet the needs of the Borough.

Q2.9 - The Key Diagram is on the last page of the Plan, and has a very low profile. To be effective, it would be much better to have it earlier on. Should it be in the development strategy section? Should it more clearly illustrate the Plan's intentions for growth?

2.30 HLM consider the Key Diagram should be positioned within the opening chapters of the Core Strategy and preferably under Key Statement DS1.

2.31 Bearing in mind a range of other settlements are now listed under Key Statement DS1, it is considered the key diagram would benefit from greater detail illustrating all of the other settlements within the Borough, named under Key Statement DS1 (or any subsequent variation of it). This will assist the reader in understanding the local geography at the outset and the relationship and distribution of the various settlements across the Borough, including whether the settlement is in the AONB, Green Belt or adjacent to other urban areas. An example is included at **Appendix 1**.

2.32 Given the relationship the Borough has with other towns, including Preston, Blackburn, Accrington, Burnley and Nelson, it is also considered these towns should be shown on the key diagram so an understanding of cross boundary issues can be more easily understood at the outset of the Core Strategy.

Q2.10 - How has the risk of flooding been taken into account? Has the sequential, risk based approach required by the NPPF been followed? How has this issue influenced the Plan's formulation and the spatial approach ultimately proposed?

2.33 No comment.

Q2.11 - Has the financial cost of any requirements on new development been taken into account? What evidence is there to demonstrate that such costs would not threaten the delivery of the development planned for? In short, is the Plan viable?

2.34 No comment.

Q2.12 - To deliver the strategy, is it the Council's intention to allocate land for development in a future Local Plan document, and to identify land for other purposes (for example, to prevent development on it) on a Policies Map? Should the Core Strategy be clearer about this, and set out the commitments to be addressed?

2.35 The Council has a prolonged history of under-delivery against its housing requirement as demonstrated by the most recent Annual Monitoring Report, 2013 and its previous performance against RSS housing targets. Due to the accrued backlog and consistent under-delivery it is important that the Core Strategy brings sites forward as soon as possible.

2.36 Delay in bringing sites forward will undermine the Council's ability to identify a 5 year supply, making the housing policies out of date (NPPF paragraph 49). The Council should therefore identify the sites for development at the earliest opportunity. It is recommended that the Core

Strategy clearly set out the location of such development and provide mechanisms to bring forward land prior to the adoption of any subsequent Local Plan documents.

Q2.13 - 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?

2.37 No comment.



HALLAM LAND MANAGEMENT LTD

RIBBLE VALLEY CORE STRATEGY

EXAMINATION HEARING STATEMENT

HOUSING (MATTER 3)

Questions 3.1 to 3.13

Date: 6th January 2014

Pegasus Reference: ST/MAN.0139/R003v2

Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Manchester

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1. INTRODUCTION

- 1.1 This statement has been prepared on behalf of Hallam Land Management Ltd (HLM) for consideration at the Ribble Valley Local Plan: Core Strategy Examination. It relates to 'Matter 3 - Housing' and the questions raised by the Inspector in relation to this topic.
- 1.2 This statement also supports HLM's representations to the Core Strategy Proposed Submission consultation period, which include Pegasus Covering Letter (L001v2) dated 18th September 2013 and various plans and photographs of HLM's land interest at Langho.
- 1.3 Separate Hearing Statements have also been prepared for Matters 1 and 2 of the Examination process. In order to reduce duplication, cross reference to our responses within these statements may also be undertaken.

2. KEY QUESTIONS FOR MATTER 3 - HOUSING

Q3.1 - As submitted, the Plan sought to deliver 4,000 new homes between 2008 and 2028. The Council proposes to increase this to 5,000.

a) What is the explanation for the proposed modification, and why is it necessary for soundness?

- 2.2 HLM support the Council's recognition that the previous housing target of 4,000 was unsound and did not meet the development needs of the Borough, as required by the NPPF. HLM also welcome the proposed modification and increase of the housing target to 5,000, which more closely matches the objectively assessed housing needs within Ribble Valley.
- 2.3 At the very least, HLM consider the words 'at least' should be inserted into Key Statement H1 so it reads:

*'Land for residential development will be made to deliver **at least** 5,000 dwellings, estimated at an average annual completion target of **at least** 250 dwellings per year over the period 2008 to 2028'*

- 2.4 That said, HLM consider the overall housing target for the Borough should be further increased in line with the Council's own evidence on housing needs, which we address under question 3.1b, and further to the need to account for some housing needs arising from surrounding authorities and in particular Blackburn with Darwen.

b) What evidence has led to the 5,000 figure being proposed? Is this a reliable source of evidence?

- 2.5 The increase is based upon the outputs from the NLP study done on behalf of the Council 'Defining a Local Housing Requirement, update 2013'. It is one of NLP's Headroom Reports which have been used in other local plan inquiries and s73 appeals and been accepted as a reliable source of evidence. It takes account of the 2011 based household projections and identifies a

wide range of potential growth scenarios for Ribble Valley, relating to migration patterns, natural household growth, and economic growth scenarios.

- 2.6 However, in determining if the 5,000 housing figure is sound and consistent with National Planning Policy, consideration needs to be given to the Council's overall vision for the Borough and wider aims of the Core Strategy and any requirements stemming from a more robust effort under the 'Duty to Co-operate'.
- 2.7 We have already expressed the shortcomings in failing to address housing supply issues in Blackburn with Darwen that has implications for Ribble Valley.
- 2.8 Turning to the Council's overall strategy, the vision of the Core Strategy is clear in that it wants to increase jobs and meet the needs, including housing, of the area. The Submission version of the Core Strategy states it aims to deliver:
- New development to meet the needs of the area for growth, services and quality of life (paragraph 3.4);
 - Match the supply of affordable and decent homes in the borough with the identified housing need (paragraph 3.12); and
 - Improve the competitiveness and productivity of local businesses by safeguarding and promoting local employment opportunities (paragraph 3.14).
- 2.9 If the Council intends to achieve these aims and provide for its full objectively assessed needs it should consider a scenario which achieves these aims. The jobs growth scenarios provide a need for 280 to 559 net new dwellings per annum. The 280 figure is based upon the most recent economic forecasts which are borne through a period of recession and therefore should be viewed with caution. The economic scenarios therefore indicate a need for in excess of 300 net new dwellings per annum.
- 2.10 The NPPF is very clear that Local Plans need to plan to meet their objectively assessed need for housing (paragraphs 14, 17, 47, 159 and 182). Paragraph 47 of the NPPF further clarifies in terms of housing plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area. The NPPF (paragraph 159) states that the SHMA should be used to determine *'the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period'*.
- 2.11 The recent SHMA, published in July 2013, identifies a net need for 404 affordable properties per annum. Whilst the document is keen to point out that this is not the figure required to be built, as some will be met by other means, the exact number which will be met by other means is never quantified. Even if three quarters of the affordable properties could be met by other means, which appears unlikely, this would still make an annual affordable housing requirement of 101 per annum. Given that the Council's policy is for this to be provided by market housing at a rate of 30% (as required by Key Statement H3) this would provide an annual requirement in excess of

336 per annum. In reality the figure would need to be greater than this as not all sites would be able to provide affordable housing at the rate suggested. This figure more closely aligns with the job growth scenarios E (559), Ea (434), F (398) and Ea (315).

2.12 The proposed amended figure of 250 dwellings per annum also takes no account of the previous under-delivery against the former RSS targets. The 2013 Annual Monitoring Report indicates that since 2003 the Council have under-supplied by approximately 291 dwellings. This under-supply needs to be taken into account within the Council's residual requirement and should be added to the net annual plan requirement over the first five years.

c) What regard has been had to the Government's household interim projections for 2011 to 2021?

2.13 As noted above, the NLP report has accounted for the Government's 2011 Household Projections but as highlighted by NLP at paragraphs 3.87 to 31.7 of their report, caution must be applied to the use of these projections due to:

- The figures being demographic and trend based only and do not take into account any policy changes that may affect actual household formation in the future;
- The figures only span a 10 year horizon rather than 15 or 20 years, which is required by Local Authorities preparing local plans;
- The unavailability of some 2011 Census data and the use of data that is based on 2010-based projections;
- The marked difference in household formation rates under-pinning the 2008 and (interim) 2011 projections, with the latter reflective of recently observed trends in suppressed household formation due to the recession and past housing under-supply.

2.14 Moving forward, NLP go onto confirm that as the economic outlook improves, latent, previously unmet demand will be unlocked and have factored this into account for household increases beyond 2021. However, suppressing demand until 2021 appears somewhat inconsistent with more recent trends and patterns within the economy. There are increasing reports that there is more confidence within the economy. Nationally, unemployment figures have dropped. House prices have also started to rise and are now above levels in 2006. Following the Government's Help to Buy initiative, which has been extended to all homes, a far wider supply of mortgage deals are also now available on the market including 5% and 10% deposit to loan deals. Such deals have not been available for a considerable period since 2007/8 and locked out many people who would have otherwise sought to create new households.

Q3.2 - Key Statement H1 says that the overall housing requirement will be subject to a formal review within five years of the Plan's adoption. What is meant by 'formal review'?

2.15 HLM would welcome clarification from the Council on this particular point and reserve judgement until an explanation is provided.

Q3.3 - 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 intension 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?

2.16 HLM do not have any particular comments on the Standen site but do note that the Core Strategy is heavily reliant on it, in terms of meeting the overall housing needs of the Borough. Should there be any unforeseen delay in bringing the site forward, this would have a major impact on the objectives of the Core Strategy and therefore options should be available within the Core Strategy that allow for the future consideration of other strategic sites to ensure there is sufficient flexibility built into the Core Strategy.

2.17 Such reliance on one site will also potentially limit the available choice of homes within the Borough.

Q3.4 - 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?

2.18 As highlighted in our Hearing Statement for Matter 2, there is clearly major variation across the range of 'other settlements' defined within Core Strategy in terms of their size, access to services, geographical location and their ability to grow due to either Green Belt or AONB constraints.

- 2.19 To set out a specific housing figure for each settlement is an option, but HLM recognise the relevant Planning and Compulsory Purchase Act or Localism Act do not fundamentally necessitate this for the Core Strategy to be found sound and to do so may necessitate a significant amount of additional work and evidence.
- 2.20 We have previously expressed our preferred options for Langho in terms of how it should sit within the settlement hierarchy in our Hearing Statement for Matter 2 and these options would partly address this issue. However, there would also appear to be merit in providing a greater level of description within the Core Strategy in relation to the various other settlements in terms of their general characteristics. This could be as simple as providing a more accurate and detailed key diagram, population figures and the results of the Settlement Hierarchy Assessment scores. This information would in itself infuse a greater level of certainty and direction to the public and developers as to where development should be targeted and would assist in the production of a Site Allocations Document.
- 2.21 HLM also note that a number of large scale planning applications have been made in Barrow which would see the settlement grow exponentially more than any of the 'other settlements' defined within Key Statement DS1. If all of the applications are approved this would take up a significant proportion of the number of total number of units afforded to the 'other settlements'. This would be regarded as a problem if this inadvertently restricted the ability of other settlements to meet their own development needs. It would also appear to be at odds with the Council's Settlement Hierarchy Assessment and may be a prime example as to why a greater level of description should be provided in relation to each of the 'other settlements'.

f) Which 'other settlements' are referred to? Have their relative sustainability credentials been taken into account?

- 2.22 HLM clearly support the inclusion of Langho as a suitable and sustainable location to meet some of the Borough's housing needs and have already set out the merits of their site located to the north of the railway line at Langho in our representations dated 18th September 2013.
- 2.23 We have also previously provided comments on the Council's Settlement Hierarchy Assessment.

Q3.5 - Is there a supply of specific deliverable sites sufficient to provide five years worth of housing, with an additional buffer of 5% moved forward from later in the plan period to provide choice?

- 2.24 The 2013 SHLAA update identifies a five year supply of 6,294 dwellings (paragraph 9.4). This clearly exceeds the Council's 5 year requirement and a 5% buffer ($1250+63=1,313$). However, the figure from the 2013 SHLAA is not based on permissions or suggested site allocations. Furthermore, no risk factor (in terms of deliverability) has been applied to any of the sites. Indeed, it would be unreasonable to assume that all of the sites identified within the SHLLA could or would come forward within 0-5 years.
- 2.25 By contrast, the most recent AMR identifies a five year supply of 1,639, which is considered to be a more accurate reflection of the Council's 5 year housing land supply position.

Q3.7 - In the light of paragraph 47 of the NPPF, should the buffer be 20%? Are there sufficient deliverable sites to provide a 20% buffer?

- 2.26 NPPF paragraph 47 identifies that where there has been a persistent level of under-delivery a buffer of 20% should be applied. The Council’s most recent Annual Monitoring Report, April 2013 (AMR) identifies that the Council has failed to meet its housing target since 2005/6 and has under-delivered for the past 7 years. It is clear that this represents a persistent under delivery and therefore a buffer of 20% should be applied.
- 2.27 Past under-delivery has led to a backlog of 291 dwellings against the RSS requirement. The Council has not accounted for this within its 5 year housing supply figures. Based on the Sedgefield Approach to calculating 5 year supply, the following requirement is necessary.

Plan requirement x 5	1250
Under-delivery against RSS	291
Total 5 Requirement	1,541
+20% buffer	308
Total 5 year Requirement + 20% Buffer	1849

- 2.28 If the backlog is added to the standard 5 year requirement, this amounts to 1,541. Applying the 20% to the backlog and the standard 5 year requirement, results in a total 5 year requirement of 1,849 dwellings. Clearly, this is greater than the supply of 1,639 identified in the 2013 AMR.
- 2.29 It could be argued that by applying the 20% buffer to the previous under-delivery and 5 year requirement is double counting. However, the 20% NPPF buffer is articulated as a percentage (rather than simply adding on an additional 1 year supply) and in our view should be applied to the totality of the housing need at the point in time of calculating the requirement. This approach does not seek to increase the Council’s overall housing requirement over the plan period. The application of the 20% buffer simply seeks to bring forward housing delivery from the latter part of the plan period to an earlier stage so as to best ensure the Authority hits its overall housing target by the end of the plan period. To not do so simply pushes back the delivery of previously unmet demand/need and increases the risk that the Authority may not reach its housing targets by the end of the plan period.
- 2.30 The alternative approach still provides a requirement of 1,791, which is still greater than the supply of 1,639 presented in the 2013 AMR.

Plan requirement x 5	1250
20% buffer	250
Under-delivery against RSS	291
Total 5 year requirement +	1791

- 2.31 Either way, if there is clear evidence that the Authority has persistently failed to hit housing targets in the past, it should follow that the overprovision of sites/land through the Local Plan process to account for the 20% buffer would be prudent so as to instil greater flexibility within the Local Plan and better ensure housing are met targets within the plan period. Indeed, as

previously noted the targets should not be seen as a cap and must be read as minimum requirements.

Q3.8 - Is there a supply of specific, developable sites or broad locations for growth for years 6 to 10 of the Plan and beyond?

- 2.32 The SHLAA would appear to indicate there is sufficient land potentially available within the latter part of the plan period to meet the Borough's housing needs.
- 2.33 Bearing in mind the potential lack of land within Blackburn to meet its requirements, as highlighted in our Hearing Statement for Matter 1 and 2, this potential land supply should also be considered in this context.

Q3.9 - Is there sufficient land available in the right places to deliver the level and spatial distribution of new homes planned for?

- 2.34 In going through the 2013 SHLAA site proforma, it is evident that sites which are regarded as being acceptable and 'deliverable' within the 'other settlements' are capable of accommodating 834 dwellings. This is slightly above the 714 target set out in the Core Strategy for the 'other settlements', which does not allow for much slippage or non-delivery. This could be addressed through the inclusion of the HLM land at Langho.
- 2.35 In this regard, HLM object to the conclusions reached in the 2013 SHLAA in relation to their land interest at Langho and as expressed in our original objection letter dated 18th September 2013 (L001v2). On the basis that this site is considered to be available, suitable and deliverable for over 400 residential units, this would significantly bolster the availability of land within the 'other settlement' category to ensure the required targets could be met.
- 2.36 It is also evident that of the sites which are regarded as being acceptable and 'deliverable' within the 'other settlements' in the 2013 SHLAA, a total of 414 of these dwellings are located on sites in Barrow. As such, there is arguably an overreliance on this settlement which is at odds with the Council's Settlement Hierarchy Assessment and confirms the settlement has a relatively low population and scores comparatively poorly in terms of its access to services and facilities.

Q3.10 - What reliance, if any, is placed on windfall sites in the housing land supply?

- 2.37 The 2013 SHLAA does not identify any allowance for windfall sites which HLM is supportive of. Indeed, the SHLAA predominantly identifies greenfield sites located outside the existing defined urban areas of the settlements suggesting obvious available urban land is highly limited within the Borough.
- 2.38 HLM are not aware of any evidence presented by the Council on past windfall development rates. As required by the NPPF, such evidence would be necessary if this were to be accounted for in the Council's housing supply/trajectory over the plan period.

Q3.11 - What approach does the Plan take to housing density? How does this reflect local circumstances?

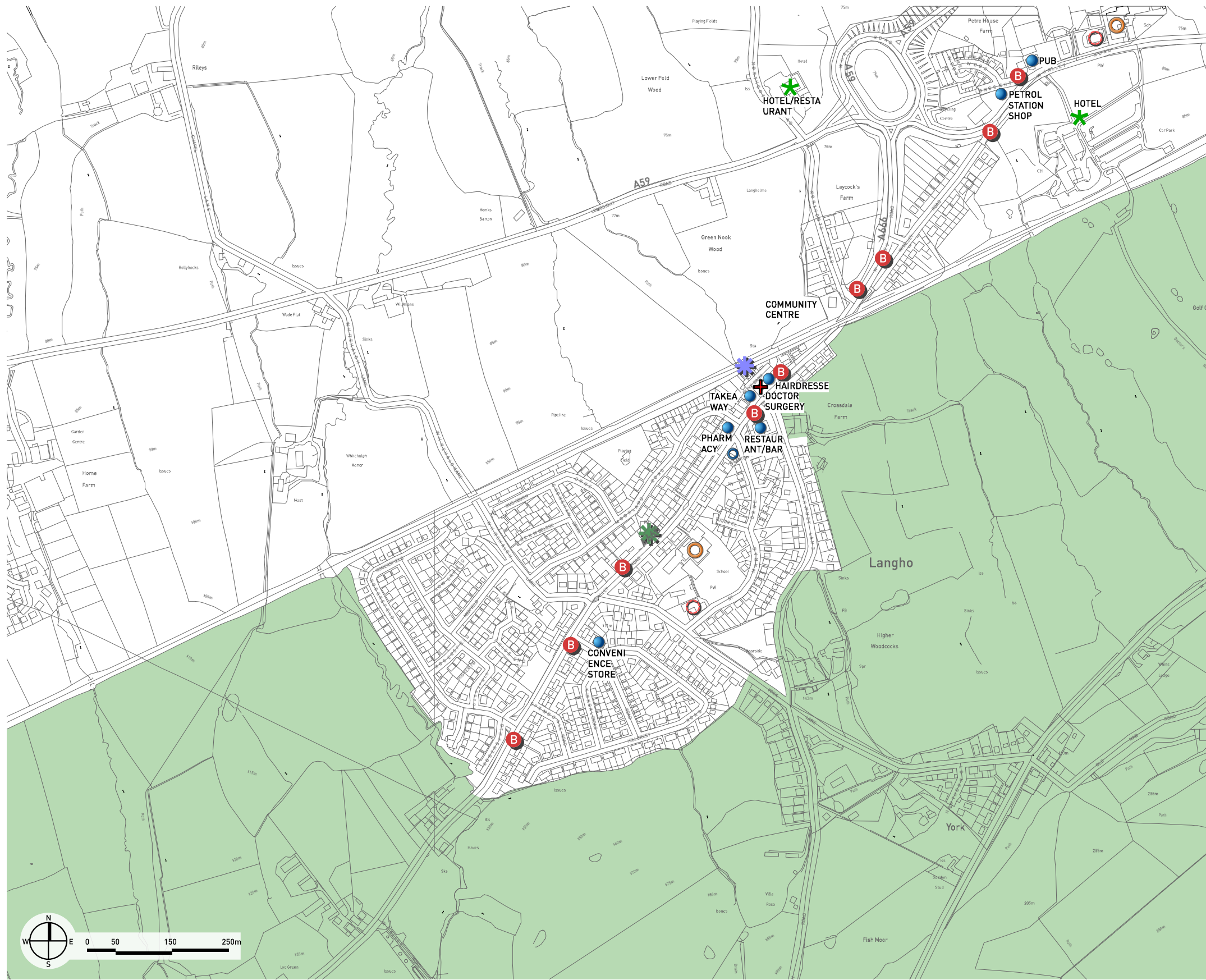
2.39 No comment

Q3.12 - What proportion of new housing planned for is expected to be on previously developed land? How does the Plan encourage the use of brownfield land?

2.40 HLM are supportive of the current position within the Core Strategy where no brownfield land development target is applied. The SHLAA illustrates there are limited deliverable brownfield sites available within the Borough and therefore it must be assumed that the majority of the Borough's development needs will have to be met on suitable greenfield sites.

Q3.13 - Should the expected rate of market and affordable housing delivery through the plan period be illustrated by a housing trajectory in the Plan?

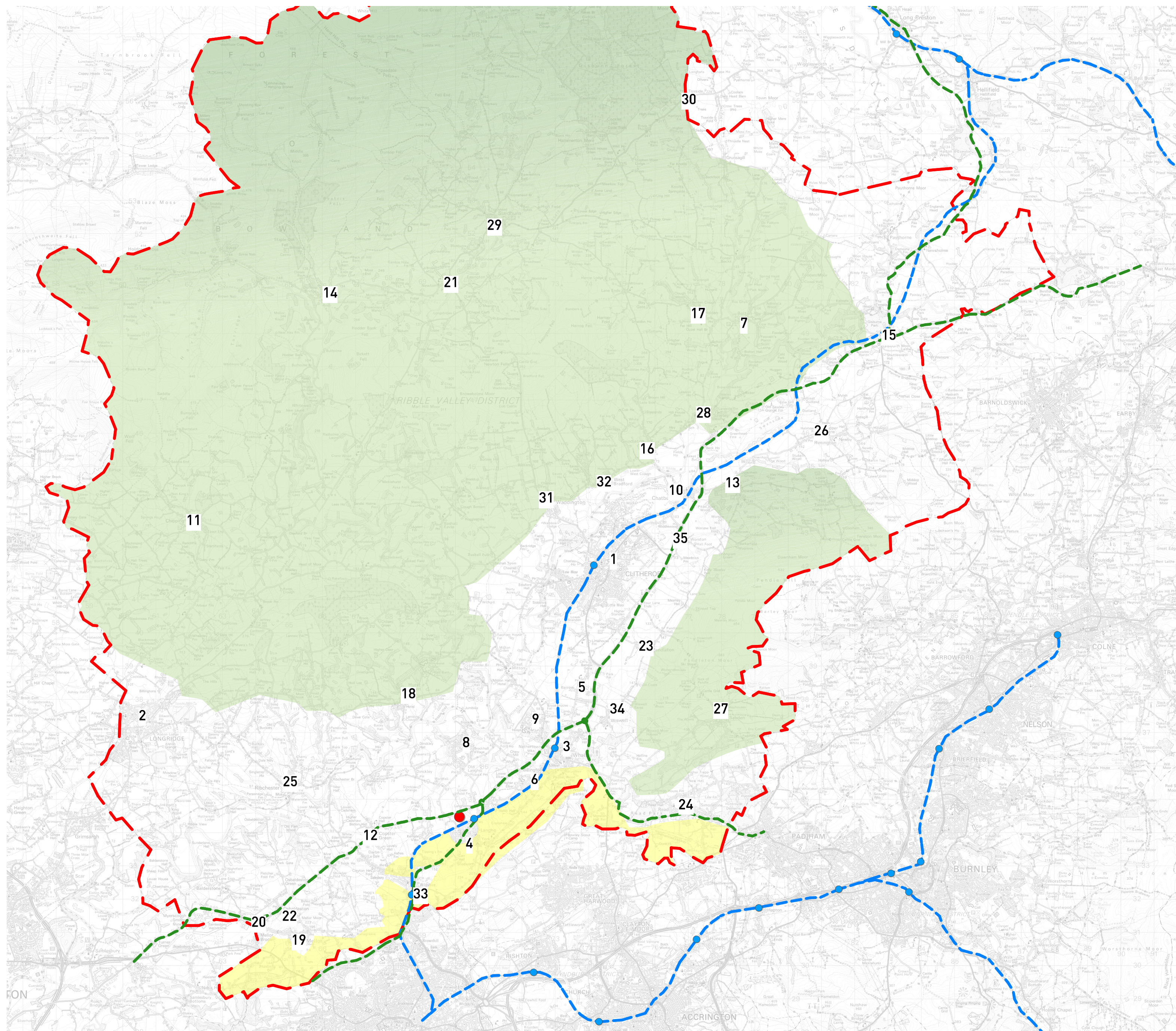
2.41 HLM would welcome the inclusion of a housing trajectory within the Core Strategy.










Langho, Ribble Valley - Service Plan



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- KEY**
-  Ribble Valley District Boundary
 -  Railway Line
 -  Major A Roads
 -  Hallam Land Management's Land Interest
 -  Railway Stations
 -  Area of Outstanding Natural Beauty
 -  Green Belt

- Key Settlements**
1. Clitheroe
 2. Longridge
 3. Whalley

- Other Settlements**
4. Langho
 5. Barrow
 6. Billington
 7. Bolton-by-Bowland
 8. Brockhall
 9. Calderstones
 10. Chatburn
 11. Chipping
 12. Copster Green
 13. Downham
 14. Dunsop Bridge
 15. Gisburn
 16. Grindleton
 17. Holden
 18. Hurst Green
 19. Mellor
 20. Mellor Brook
 21. Newton
 22. Osbaldeston
 23. Pendleton
 24. Read and Simonstone
 25. Ribchester
 26. Rimington
 27. Sabden
 28. Sawley
 29. Slaidburn
 30. Tosside
 31. Waddington
 32. West Bradford
 33. Wilpshire
 34. Wiswell
 35. Worston

Ribble Valley District - Borough Settlement Plan/Key Diagram

