

Ribble Valley Borough Council

**Examination of the Ribble Valley Core Strategy
Development Plan Document**

EXAMINATION HEARING STATEMENT

**PREPARED BY DAVID LOCK ASSOCIATES ON BEHALF OF
BARROW LANDS COMPANY LIMITED**



IN RESPECT OF

MATTER 1 – BASIS FOR THE OVERALL APPROACH

(SCHEDULE OF MATTERS AND ISSUES FOR THE EXAMINATION)

JANUARY 2014

Matter 1 – Basis for the overall approach

Issues

1.1 Overall, has the plan been prepared in accordance with the legal requirements, including the ‘duty to co-operate’ imposed by Section 33A of the Planning & Compulsory Purchase Act 2004 (PCPA) (as amended)?

1.1.1 No. The need to discharge the duty to co-operate under the PCPA (2004) is clear but it is also clear that Ribble Valley Borough Council (‘the Council’) is unable to satisfactorily demonstrate effective co-operation with neighbouring authorities throughout the plan-making process, which dates back to 2007. Paragraph 181 of the *National Planning Policy Framework* (NPPF) states:

‘Co-operation should be a continuous process of engagement from initial thinking through to implementation....to provide the land and infrastructure necessary to support current and projected future levels of development’.

1.1.2 Paragraph 181 of the NPPF refers to plans being prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy, which is evidence of an agreed position. No such evidence has been demonstrated by the Council nor can be at this late stage. The duty to co-operate cannot be dealt with retrospectively. Therefore, no changes can be proposed to address this serious deficiency.

1.1.3 The *National Planning Practice Guidance* (NPPG) (‘Beta’ version) is also relevant although it only carries limited weight at the present time. It states:

‘Local planning authorities must demonstrate how they have complied with the duty [to co-operate] at the independent examination of their Local Plans. If a local planning authority cannot demonstrate that it has complied with the duty then the Local Plan will not be able to proceed further in examination.’

1.1.4 The NPPG goes on to state:

‘Cooperation should produce effective policies on cross boundary strategic matters. This is what local planning authorities and other public bodies should focus on when they are considering how to meet the duty.’

1.1.5 It is evident from the documentation submitted by the Council that the “co-operation” that has taken place between the Council and nearby local planning authorities (LPAs) has been ad hoc, intermittent, incomplete and therefore not a continuous process of engagement from ‘initial thinking’ as required by the NPPF. This is a serious flaw in the overall approach to the Plan and renders the Plan ‘unsound’.

1.1.6 This is evident from the ‘Duty to co-operate’ document submitted by the Council (Post 3.3) most of which refers to discussions with neighbouring

authorities between 2010 and 2012. This was before submission of the Core Strategy to the Secretary of State in September 2012 and before the Inspector raised fundamental concerns about the evidence base being ‘out-of-date’ and ‘unreliable’ and the spatial approach to the delivery of new housing in the Borough being ‘unclear’. The correspondence submitted following the evidence ‘refresh’ by the Council (Post 5.13.1 and 5.13.2) fails to address this fatal deficiency. The documents submitted by the Council illustrate the partial, loose and inconclusive discussions held with neighbouring authorities over the duty to co-operate and in particular the increase of the Borough’s housing requirement from 4,000 or 200 dwellings per annum (dpa) to 5,000 or 250 dpa that took place in August 2013, following the publication of the Nathaniel Lichfield and Partners’ report - *Implications of the 2011-based CLG Household Projections - Ribble Valley Housing Requirement Update* on 30 May 2013 (Post 5.8).

1.1.7 Throughout the plan-making process we believe that the Council has persistently failed to meet the ‘full objectively assessed needs for market and affordable housing in the [Ribble Valley] housing market area, as far as is consistent with the policies set out in the Framework’, as required by Paragraph 47 of the NPPF. Please note that we consider that the ‘full objectively assessed need’ for the Borough, taking into account the Council’s *Employment Land Review* (Post 5.3) job growth scenario to be not less than 6,000 new homes or 300 dpa over the Plan period (2008-2028) as set out in detail in our Examination Hearing Statement on Matter 3 – Housing. The failure to provide sufficient housing threatens to undermine the vision and objectives of the Plan. Notwithstanding our earlier comments, in our opinion the Plan can only be made sound by a significant increase in housing provision (to not less than 300 dpa or 6,000 dwellings overall to 2028) and by naming Barrow in the Plan as a sustainable and suitable location for significant housing growth to contribute towards meeting this need and to support the Barrow Enterprise Park (the Borough’s principal employment location).

1.1.8 The Council, in the report to the Council’s Planning & Development Committee meeting of 8 August 2013, seeks to partly justify its under-shooting target of 5,000 or 250 dpa by referring to Blackburn with Darwen Council’s concerns about the impact [of the Ribble Valley target] upon their development and growth aspirations and their ability to encourage investment in higher quality sites as a key part of boosting their housing offer to support regeneration and economic growth. Blackburn with Darwen Council has raised similar concerns before but without justification, as indicated in the Inspector’s report (October 2010) on the Council’s Core Strategy, when it was stated at Paragraph 10, that:

‘Concerns about the possible adverse impact of the Central Lancashire Growth Point on the delivery of housing in the Borough do not seem to have materialised, due to the limited interaction and contrasting economic fortunes which shape the respective housing markets.’

1.1.9 Similar considerations apply in relation to the Ribble Valley as borne out by the *Pennine Lancashire Housing Strategy 2009-2029* (Supp 3.17) and *Refresh* (Supp 3.18), which indicate that Pennine Lancashire (PL) is a sub-region with four distinct housing sub-markets: Blackburn/Hyndburn, Burnley/Pendle, Ribble Valley and Rossendale.

- 1.1.10 The Strategic Housing Market Assessment (2008) (Supp 4.11), although out-of-date refers to a relationship between the southern part of Ribble Valley with the northern parts of Blackburn and Hyndburn with the remainder of the Borough showing linkages with Preston, South Ribble, Wyre, Lancaster, Craven, Pendle and Burnley, Greater Manchester, West Yorkshire and Merseyside. The SHMA (2008) indicates that the Ribble Valley does not share a coherent housing market area with any single adjacent authority or group of authorities, but instead forms part of a complex pattern of economic and housing market linkages with other parts of the North West and adjoining Yorkshire authorities. The SHMA (2008) and the Update (2013) (Post 5.7) take the view that the housing market is discrete to the Ribble Valley.
- 1.1.11 The *Pennine Lancashire Housing Strategy 2009-2029* (Supp 3.17) states that the Ribble Valley benefits from being adjacent to centres of employment in Preston and Pennine Lancashire and is accessible to Greater Manchester and Yorkshire. It has no need for major intervention to attract developers and the housing market area is projected to experience the largest increase in population in the North West with significant household growth up to 2032. Net housing supply has not been responding to increases in household growth over the last five years. This was due to historic under-provision and restraint in the *Joint Lancashire Structure Plan 2001-2016*, the Housing Moratorium between 2004 and 2008 and the *North West of England Regional Spatial Strategy to 2021*, which were aimed at housing market renewal elsewhere in Pennine Lancashire. This seriously damaged housing delivery and affordability in the Borough and it has never recovered. However, this must be addressed now as part of the Core Strategy and can only be made sound by a significant increase in housing provision (to not less than 300 dpa or 6,000 dwellings overall to 2028).
- 1.1.12 Due to the nature of the housing market in the Ribble Valley, its anticipated population/household growth and its chronic history of under-supply we consider that the Council should meet its full objectively assessed housing needs within the Borough and not expect half-hearted approaches to neighbouring authorities to help them meet unmet needs from the Ribble Valley or justify a lower housing target. Such belated attempts were not realistic in technical, political or housing market terms and should be given very little weight. This is accepted by the Council. At our client's appeal Inquiry in June and September 2013, the Head of Regeneration and Housing explained that some attempt had been made to engage with surrounding local planning authorities (LPAs) on their proposed revised housing number for the Core Strategy, but he had concluded "*practicalities of securing a joint approach at this stage not realistic and would take a significant amount of both technical and political effort to secure*" (para 6.7, officer's report to RVBC Planning and Development Committee 6th August 2013).
- 1.1.13 The Council has not engaged continuously and constructively with neighbouring LPAs on the strategic matter of the number of houses proposed in the Core Strategy, there is no agreement as to how it could be accommodated and how any unmet need from Ribble Valley could be met elsewhere, even if that were suitable and realistic. Similar conclusions led to Hart District Council withdrawing its Core Strategy from examination following comments from the Inspector in July 2013.

- 1.1.14 There appears to be a fairly commonly held view amongst neighbouring authorities that there is unlikely to be any significant adverse impact on neighbouring areas arising from the levels of housing development proposed in Ribble Valley with the exception of strong concerns raised by Blackburn and in a similar context from Hyndburn. Whilst these two districts nominally have the closest relationship with Ribble Valley's housing market it is not considered that the meeting of housing needs in the Ribble Valley would significantly affect out-migration or opportunities for these districts to pursue growth investment and rebalancing of their housing markets.
- 1.1.15 In September 2013, in relation to the Lichfield Local Plan, the Inspector concluded that the duty to co-operate had been discharged but the Plan was not justified and therefore not 'sound' (Paragraph 182 of the NPPF) as it did not make adequate provision for the objective assessment of housing need contained in the Council's own evidence base.
- 1.1.16 We consider that Ribble Valley Borough Council has failed to discharge the duty to co-operate but even if it has, it has failed to meet the full objectively assessed housing needs of the Borough. As such the Plan is 'unsound'. The damaging policy of housing restraint in the Ribble Valley should not be allowed to continue as it pulls against strong demographic and market forces and is contrary to the NPPF and other Government policy statements aimed at significantly boosting housing supply.
- 1.2 Has the Plan been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the Regulations?**
- 1.2.1 No comment.
- 1.3 Has the formulation of the Plan been based on a sound process of sustainability appraisal and testing of reasonable alternatives?**
- 1.3.1 No. We have long held the view that the Sustainability Appraisal (SA) undertaken by Hyder on the Council's behalf is fundamentally flawed particularly as the strengths of the strategic housing site at Standen – on which the Council's development strategy and housing delivery is heavily reliant - were exaggerated and its sustainability weaknesses downplayed in order to support the Council's chosen spatial development strategy (see our detailed critique and corrections using the sustainability objectives used in the SA submitted on 14 June 2012 as part of the Regulation 19 consultation on the Plan).
- 1.3.2 Equally, when testing the possible alternatives – one of which was Option E (i.e. the Option which involved strategic housing growth at Barrow in the *Core Strategy: Generation of Alternative Development Strategy Options* (June 2011) – which proposed the development of 1,950 dwellings on a strategic site at Barrow, the location of the Borough's principal strategic employment location and the subject of *Key Statement DS1 – Development Strategy in the Plan* – the benefits of Barrow were unjustifiably overlooked. Therefore we consider the Sustainability Appraisal and testing of reasonable alternatives to be flawed, unjustified and unsound as it does not represent the most appropriate strategy when considered against reasonable alternatives.

1.3.3 Whilst we do not agree with the quantum of housing put forward in this option (Option E), it is evident that Barrow should be considered as a strategic location for a significant scale of housing development because of its strategic location in the Clitheroe employment hinterland and adjacent to the Borough's principal strategic employment location (Barrow Enterprise Park). At Paragraph 7.5 of the Plan, it states:

'The Council considers Barrow Enterprise Park to be an important employment land resource that has the significant potential to provide for economic growth and deliver sustainable development for the borough.'

1.3.4 This has been reinforced by the Council's decision to grant outline planning permission for two outline planning applications involving the substantial extension of the Barrow Enterprise Park to the north for further B1/B2/B8 development on 6 hectares and 3 hectares respectively. Barrow has excellent public transport links and the neighbouring service centres of Clitheroe and Whalley are highly accessible. This is reflected in Ribble Valley Borough Council's *Settlement Hierarchy (2008)* (Supp 4.9), which states that, in terms of public transport, Barrow has the best access to all three key service centres. Barrow is well-located in relation to the A59 and given that *Key Statement DS1: Development Strategy* identifies Barrow Enterprise Park as the main location for employment the settlement needs to be recognised as a favourable and sustainable location for future housing growth. Housing development in Barrow would provide homes and jobs in close proximity, helping to reduce the need for residents to travel. We can see no logical reason why the Council and their consultants (Hyder) have failed to recognise the considerable locational benefits of Barrow as the prime location for meeting some of its acute housing need. We are also not aware of any more suitable or sustainable location for meeting the balance of the Borough's proper housing requirement.

1.3.5 In sustainability terms we consider the choice of Standen to the exclusion of Barrow in the Core Strategy is unjustified, particularly as we feel there has been inadequate assessment of its sustainability credentials but especially its impacts on the heritage assets in and around Standen Hall and the surrounding area, including the Forest of Bowland Area of Outstanding Natural Beauty.

1.3.6 Standen Hall is a Grade II* listed building in the top 8% of buildings in the country listed for their outstanding architectural and historic interest and a registered park/garden. Whilst the Council has somewhat surprisingly, given the timing of this examination, recently resolved to approve the outline planning application for the Standen development (App. No. 3/2012/0942), this is subject to departure procedures and may lead to the Secretary of State 'calling in' this major proposal for his own determination. This must be a possibility given the timing vis-à-vis this examination, which proposes the strategic housing site in the Plan but also because a number of statutory consultees – Lancashire County Council (highways, archaeology and landscape), English Heritage, Natural England, Georgian Group and Lancashire Gardens Trust – raised reservations or concerns about the impact of the proposal on the local highway network, the Roman Road that runs through the site, this important Grade II* country house and the Forest of Bowland Area of Outstanding Natural Beauty.

- 1.3.7 The proximity of Standen to Clitheroe to which, superficially on a plan, it seems well connected is illusory: connectivity is poor and time and distance to the centre of Clitheroe from the new development at Standen would be equalled by alternatives that are physically separate. This is again borne out by the concerns of Lancashire County Council (as local highway authority) on the Standen application; they are concerned about the access to the Standen site and were therefore unable to support the application as submitted due to worries about the resulting impact upon queuing and delays on the local highway network. Other concerns related to the lack of integration of the large mixed-use site with the existing built-up environment and existing highway network. This seriously undermines the credibility of the SA that supports a strategic housing site at Standen.
- 1.3.8 In conclusion, we retain serious concerns about the SA that purportedly underpins the Core Strategy and supports the allocation of a strategic housing site at Standen because it has been proven to be unreliable, ineffective and unjustified not only in respect of Standen but the objective consideration of reasonable alternatives. This makes the Plan unsound; it could only be made sound by an increase in the housing requirement and by naming Barrow as a separately defined settlement and as a suitable receptor for up to 500 new homes to support the identification of the Barrow Enterprise Park in the Plan's development strategy (Key Statement DS1). This would involve drafting the changes to the Core Strategy and revising the SA as indicated in our previous representations on the Regulation 19 version of the Plan.
- 1.4 **How have the possible effects on European wildlife sites influenced the Plan and the assessment of alternative options?**
- 1.4.1 No comment.
- 1.5 **How has the Plan been influenced by the Sustainable Community Strategy for the district?**
- 1.5.1 The *Sustainable Community Strategy 2007-2013* (Supp 4.2) was produced in March 2008, compiled after extensive community engagement and was meant to 'reflect the issues that the people of the Borough felt were important to them at the time'. This document is now almost 6 years old and like the *Strategic Housing Market Assessment, 2008 (SHMA)* and *Strategic Housing Land Availability Assessment, 2009 (SHLAA)* produced around the same time is out-of-date.
- 1.5.2 Therefore, it has to be concluded that the *Sustainable Community Strategy* has had little, if any, influence on the formulation of the Plan. The document purports to cover issues of affordable housing, identification of employment land and impact on the environment so was intended to set priorities to be considered within the Plan. It does not. This cannot be rectified now.
- 1.5.3 The highest proportion of respondents ranked "the need for affordable housing" as the top priority area for improvement, 'is one of the highest priorities for the Borough Council' (Page 8) and 'to address the lack of affordable housing in the Ribble Valley' is a "key priority" (Page 11).
- 1.5.4 The Strategy set a key target (Page 33) to increase the number of affordable houses in the district from 62 per year to 100 annually. The

Council has failed miserably in its performance against this target, as shown in Table 1 below.

Year	Completions
2008-09	39
2009-10	43
2010-11	27
2011-12	61
2012-13	29

Table 1 – Affordable housing completions in RVBC (Source: RVBC)

- 1.5.5 There are acute housing needs in the Borough. The previous SHMA (2008) (Supp 4.11) set an affordable housing requirement of 264 affordable homes to be provided each year in the Borough. However, the Inspector found this study out-of-date.
- 1.5.6 The *Strategic Housing Market Assessment (2013)* (Post 5.7) produced by HDH Planning and Development Limited updates the assessment of housing need in the Borough. It re-emphasises that housing affordability and access to affordable housing is a major issue in the Ribble Valley and using the CLG standard method for assessing need the report indicates that annual need for affordable housing in 2013 in the Borough is 404 dwellings a year (Table 5.9 page 54).
- 1.5.7 The main contribution to the supply of affordable housing is new build in association with qualifying market housing schemes. With an overall housing requirement of 250 dpa set in the Core Strategy and an affordable housing target of 30% on sites of 5 dwellings and more (*Key Statement H3 – Affordable Housing*) would only help deliver in the order of 75 affordable units per year. This means that the annual affordable housing requirement will continue to grow significantly year-on-year unless the Council fundamentally reconsiders its housing requirements and produces a significant improvement in delivery and affordability; this must be addressed quickly to avoid the vast shortfall getting any greater with consequent social and other effects. The only way to address this and make the Plan sound is by significantly increasing the overall housing requirement for the Borough, which will in turn have an impact upon the delivery of affordable housing so as to meet the Council's corporate objectives.
- 1.5.8 A corporate ambition of the Council, found in its *Corporate Strategy 2011-2015* (Supp 4.3) is to, 'Match the Supply of Homes in the area with the Identified Housing Need'. It is especially looking to ensure that there are sufficient homes for local people who are in housing need. The Council recognises that the availability of such housing impacts on the retention of skills in the borough and has a major influence upon the local economy and quality of life. Unfortunately, the Council, through its under-provision of housing in the Core Strategy, which impacts directly and adversely upon the provision of affordable housing, is seriously failing in this ambition. Whilst it has recently increased the proposed supply of homes in the Borough, this will not, on the Council's own evidence, meet identified needs and jobs growth.

- 1.5.9 In conclusion. the Plan is unsound as it does not meet the full, objectively assessed needs for housing in the housing market area, the assessment of strategies for housing, employment and other uses is not integrated, the Plan is not based on effective joint working and the Plan is not consistent with achieving sustainable development. As such the Plan fails to comply with the NPPF and other statements of national policy.

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3 January 2014

Ribble Valley Borough Council

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Development Plan Document**

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**PREPARED BY DAVID LOCK ASSOCIATES ON BEHALF OF
BARROW LANDS COMPANY LIMITED**



IN RESPECT OF

MATTER 2 – THE STRATEGY

(SCHEDULE OF MATTERS AND ISSUES FOR THE EXAMINATION)

JANUARY 2014

Matter 2 – The Strategy

Issues

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

2.1.1 We are particularly concerned with the scale and distribution of housing as a strategic, cross-boundary issue and how this has been handled by the Council in the Plan. As set out in our Hearing Statement on *Matter 1 – Basis for the overall approach*, we do not consider that meaningful cross-boundary working has taken place sufficient to satisfy the legal requirement to co-operate under section 33A of the *Planning and Compulsory Purchase Act 2004* (as inserted by section 110 of the *Localism Act 2011*) or the policy tests set out in paragraphs 178-181 of the *National Planning Policy Framework* (NPPF).

2.1.2 The Plan does consider the impacts of development within Preston City Council's administrative area on its spatial distribution of housing; it takes account of 200 dwellings that may be delivered within the Preston part of Longridge, which are deducted from the requirement for Longridge and redistributed to 'other settlements' in the Borough. This figure has apparently been derived from discussions with Preston City Council. However, the Council has objected to the Preston Local Plan (see the Planning & Development Committee report of 7 November 2013), on the basis of a reduced allocation near to Longridge, which would have implications on the Longridge 'adjustment' and the spatial distribution of housing. The Council can comment further on this at the examination.

2.1.3 The Council has received an objection from Blackburn-with-Darwen Council about the increased housing requirement (to 250 dpa), which we argue is still too low based upon the NLP Housing Requirement Update 2013 report, as they consider that it would 'be in direct conflict with the established planning strategy elsewhere in Pennine Lancashire', 'harm the delivery of sustainable development in Blackburn with Darwen and reduce the likelihood of key strategic housing developments being implemented' (see their consultation response of 20 September 2013). Whilst we take issue with this (see Hearing Statement on Matter 1) we agree with Blackburn-with-Darwen Council's comment that 'there is no evidence....that cross-boundary issues have formed any significant input to the proposed target.' This is unsound as it fails the legal and policy tests in the NPPF.

2.1.4 This is underlined by comments from Wyre Council that whilst a Memorandum of Understanding is being drafted between the Fylde Coast authorities (including Lancashire County Council) in relation to strategic planning issues across boundaries there is no such arrangement immediately planned with other adjoining authorities (including Ribble Valley) although the County Council has apparently been approached on this.

2.1.5 The conclusions of the Council's limited and somewhat belated attempts to deal with cross-boundary strategic issues are consequently unresolved and unjustified and therefore not sound. At this stage, we believe both the legal requirement and the policy tests have been failed; as the legal test has not

been satisfied the Inspector has no choice other than to recommend that the Plan is not adopted.

2.2 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?

2.2.1 No. The Council needs to ensure that the housing requirement is appropriate to meet the housing needs of the Borough for the whole of the Plan period. At present, the proposed requirement of 250 dpa is in direct conflict with the evidence base and the Plan's employment aspirations and will undoubtedly fail to ensure that housing supply meets the identified housing need in the Borough to 2028. This is a critical flaw in the Plan that would compound the housing under-provision problems that have occurred in the Borough over the last 10 years since the Housing Moratorium in 2004.

2.2.2 It is our evidence that the Plan is unsound and inconsistent in that the housing requirement fails to meet the full, objectively assessed needs for housing in the Borough. To be found sound, we consider that the Plan should be changed to provide for at least 300 dpa or 6,000 new homes over the Plan period. Our evidence is that if the housing target is not raised considerably (beyond the 280 dpa figure suggested by NLP) then there will be several consequences, including:

- A significant increase in net in-commuting;
- Further pressure on housing affordability as those living outside the area and commuting-in seek to find houses in Ribble Valley;
- Upwards pressure on wages and skills shortages emerging for employers; and
- An increasing ageing population with ensuing social consequences

2.2.3 An important objective of the Plan is to improve competitiveness and productivity of local businesses by safeguarding and promoting local employment opportunities; a key element of this objective is to secure more jobs in the Borough to re-balance the out-commuting that occurs to access employment opportunities in Preston, Blackburn, Manchester and its satellite towns. This is important for sustainability and environmental reasons, by reducing the need for travel, particularly by the private car (see Paragraphs 29 and 34 of the NPPF), thereby clawing back the workforce that currently commutes and addressing issues of workforce change. For the avoidance of doubt, we remain of the opinion that the minimum appropriate household annual growth requirement for the Borough to adequately take account of demographic change and the likely future needs of the economy should be **in the order of and not less than 300 dwellings per annum or 6,000 new homes in total. The Plan should be amended to reflect this to make it sound.**

2.2.4 For reasons previously stated we are unclear how the needs in other adjacent local authority areas have been taken into account. There is no clarity or

certainty about whether or not other neighbouring authorities are fully meeting their own assessed needs and/or the arrangements that are in place for cross-boundary provision if they are not.

2.3 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 Samesbury Enterprise Zone. In broad terms, is this the most appropriate spatial strategy?

2.3.1 No. The spatial development strategy for future housing growth is basically an enlarged amalgamation of Option B & Option D, which were both presented in the *Core Strategy: Generation of Alternative Development Strategy Options* (June 2011). Option B focused development towards the main urban settlements of Clitheroe, Longridge and Whalley, based largely on population size whilst Option D was centred on a strategic site sprawling south of Clitheroe towards the historic enclave of Standen Hall, a Grade II* listed building in the top 8% of buildings in the country listed for their outstanding architectural and historic interest and registered park/garden.

2.3.2 In short, we consider that the proposed spatial distribution of housing is unjustified and does not represent the most appropriate strategy when considered against reasonable alternatives. However, Barrow Enterprise Park represents the best location for providing office, light industrial and other employment floorspace in the Ribble Valley as it has the benefit of planning permission for a variety of industrial and commercial uses, is situated in the heart of the Borough, near the A59 and close to the motorway network.

2.3.3 In particular, we consider that the strengths of the strategic housing site at Standen have been exaggerated, while the potential of Barrow – the well-connected location of the Borough's principal strategic employment site - as a receptor for future housing growth has been unjustifiably overlooked. Our detailed representations (Regulation 19 stage) offered correction from our point of view of the Council's flawed Sustainability Appraisal (SA) of the Standen and Barrow Options using sustainability objectives outlined in the *Core Strategy Sustainability Appraisal (SA)*. The main findings of our assessment have been listed again below as these are extremely relevant to our concerns about the Plan's spatial strategy approach to housing, which was decided not only without knowing the number of houses required but without having the necessary SA before making this decision.

1. Option E (The Option which proposed strategic housing growth at Barrow), was also presented in the *Core Strategy: Generation of Alternative Development Strategy Options* (June 2011) and proposed the development of 1,950 dwellings on a strategic site at Barrow. Although we do not agree with the quantum of housing put forward in this option, and recognise that the scale of such development could have a detrimental impact on the existing settlement, it is evident that Barrow should be considered as a strategic location for a significant scale of housing development because of its location in the Clitheroe employment hinterland and adjacent to the Borough's principal employment location (Barrow Enterprise Park). This is recognised in Key Statement DS1 with the focus of new employment development at the Barrow Enterprise Park site. Given the economic, sustainability

and environmental objectives of the Plan (set out above) we cannot understand why Barrow has not been identified as a suitable location for significant housing growth in the Plan;

2. Barrow has excellent public transport links and the neighbouring service centres of Clitheroe and Whalley are highly accessible. This is reflected in Ribble Valley Borough Council's *Settlement Hierarchy*, which states that, in terms of public transport, Barrow has the best access to all three Key Service Centres.
3. Barrow is well-located in relation to the A59 and given that Key Statement DS1: Development Strategy identifies Barrow Enterprise Park as the main location for employment the settlement needs to be recognised as a favourable location for future housing growth. Housing development in Barrow would provide homes and jobs in close proximity, helping to reduce the need for residents to travel.

2.3.4 These locational and sustainability merits of Barrow as a suitable focus for further housing growth have been set out in evidence presented on behalf of our client at the appeal Inquiry and Hearing held in June, September and November 2013, the latter being uncontested by the Council and Lancashire County Council (APP/T2350/A/13/2190088/NWF & APP/T2350/A/13/2197091).

2.3.5 Hence, we consider the development strategy to be unsound. It could only be made sound by increasing the housing target to not less than 300 dpa for the Plan period and by naming Barrow as a receptor for up to 500 additional new homes to help meet this increased housing requirement. This would involve changing the Core Strategy and revising the SA as indicated in our Regulation 19 representations.

2.4 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?

2.4.1 This is a matter for the Council to address. It appears to rely heavily on the Council's *Settlement Hierarchy (December 2008)* but once again this overlooks the locational benefits of Barrow, which including the following benefits:

1. Best accessibility by public transport to all three Key Service Centres;
2. Population between c.500 and 1000;
3. Convenience facilities;
4. Community facilities;
5. Employment – Barrow Enterprise Park;

2.4.2 By applying a more objective appraisal, Barrow would score more highly as a sustainable and suitable location for housing growth in the Borough. We cannot understand why Barrow was rejected as a suitable location for strategic housing growth especially as it is already part of the Council's spatial strategy (Barrow Enterprise Park). We consider that its exclusion is unsound and that Barrow should be identified in the Plan as a receptor for up to 500 additional new homes. The *Ribble Valley Strategic Housing Land*

Availability Assessment (SHLAA) (2009) (Sup 4.10) concluded that all of our client's land at Barrow had considerable development potential with a capacity for 709 dwellings, which would be deliverable in 6+ years (i.e. from 2015). The SHLAA has also been updated (2013) (Post 5.18) to include new sites and update sites previously included with an assessment in terms of suitability, availability and achievability. Our client's land (gross area 20.27 hectares) at Whalley Road, Barrow has been included in the *Updated SHLAA (2013)* and is included in the 6-10 year supply albeit that there is no obvious reason why delivery has been put back by 5 years, particularly as there are two extant planning appeals awaiting determination by the Secretary of State following the Inquiry/Hearing last year.

2.5 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?

2.5.1 This is a question for the Council to answer. The Council's proposed modification outlines a range of other 'defined' settlements (including Barrow) that are suitable for future housing growth and clarifies the focus of development beyond the main urban areas of the Borough. However, whilst Barrow is included as a 'defined settlement', we are of the view that Barrow is dissimilar to the other settlements in this category.

2.5.2 Unlike most of the Borough's smaller settlements, Barrow is almost completely unconstrained and is not included within the Forest of Bowland Area of Outstanding Natural Beauty (AONB) or Green Belt. Other settlements are of architectural or historic interest and designated as conservation areas.

Table 1: Defined Settlements located within AONB

Bolton by Bowland	Holden	Sawley
Chipping	Hurst Green	Slaidburn
Downsham	Newton	Tosside
Dunsop Bridge	Pendleton	Waddington
Grindleton	Sabden	West Bradford

Table 2: Defined Settlements located within the Green Belt

Billington	Langho	Mellor
Read & Simonstone	Wilpshire	

Table 3: Defined Settlements within Conservation Areas (and in AONB *)

Bolton by Bowland*	Gisburn	Pendleton*	Slaidburn*
Chatburn	Grindleton*	Ribchester	Waddington*
Chipping*	Hurst Green*	Sabden*	Wiswell
Downham*	Newton*	Sawley*	Worston

2.6 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?

2.6.1 No. As can be seen above, there are many differences between the other defined settlements and Barrow and it will not lead to the most sustainable distribution of new development across the Borough. The SA does not individually assess the capability and suitability of these settlements to accommodate additional development in a sustainable manner to satisfy Paragraph 7 of the NPPF. This raises serious soundness issues in relation to Paragraph 182 of the NPPF.

2.6.2 As a consequence we consider that Barrow should be separately identified as a 'transformational settlement' and location for further significant housing growth (an additional 500 dwellings) in the Plan. If this is not deemed acceptable for some reason, we consider that Barrow should be seen (for the reasons set out) as the 'first priority' settlement within the category of 'defined settlements' as capable of accommodating significant housing development. We consider that this could be the subject of a change to Appendix 2 and Key Statement DS1: Development Strategy. There are many sustainability and practical advantages to this:

- There is no evidence that delivery of circa 45 houses (Revised footnote 20) in each of the 'other settlements' is deliverable, practicable or sustainable (1440 dwellings in total spread across other settlements);
- Indeed, for reasons already stated (e.g. AoNB, Green Belt and other designations, such as designation as Conservation Areas) many settlements will be unsuitable for further development;
- There will be no 'allocations' within these settlements for some time, leading to further uncertainty and delay in the provision of much-needed market and affordable housing;
- It would help remove a concern that the Council's spatial development strategy in respect of the other defined settlements is unclear especially in respect of the future Housing and Economic Development Plan Document, which will not be produced and adopted for some time;
- It would make the delivery of affordable housing much easier in significant numbers and avoid the risk of small, incremental provision by Registered Providers or running into viability problems;
- It would not preclude the delivery of additional housing (and affordable housing) in the other settlements should this be desirable and possible; and
- The SHMA (2013) (Paragraph 4.41) indicates that households in the Clitheroe area are least likely to be able to afford market housing; Barrow is well-related to the market town and well-connected by public transport to Clitheroe, as well as being well located in relation to all three Key Service Centres.

2.7 Overall, is the distribution of development sought the most appropriate strategy, and what alternatives have been rejected?

2.7.1 No. We consider that the proposed spatial distribution of housing is unjustified and does not represent the most appropriate strategy when considered against reasonable alternatives. The alternative of Barrow – the well-connected location of the Borough’s principal strategic employment site - as a receptor for future housing growth has been unjustifiably overlooked. As a consequence of its many significant sustainability and locational advantages we consider that the Plan (and Key Statement DS1) should be changed to name and separately include **Barrow as a ‘transformational’ settlement**, which is a suitable receptor for strategic housing development of at least 500 dwellings over the Plan period. It has seen substantial growth in recent years, has the benefit of residential and employment development consents and has been accepted by the Council (and Inspectors on appeal) as being a sustainable location that has the ability to successfully absorb additional, quality development without detriment to the character and appearance of the settlement. It is in an excellent strategic location when considered in relation to other settlements, including the main urban areas of Clitheroe and Whalley, and contains the Borough’s main employment site – Barrow Enterprise Park.

2.8 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?

2.8.1 No comment.

2.9 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?

2.9.1 No comment.

2.10 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?

2.10.1 No comment.

2.11 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?

2.11.1 No further comment; we have previously commented in other Hearing Statements on Matters 4.3 and 4.4.

2.12 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?

2.12.1 We have referred to this earlier in this Statement. The Council refers to an allocations process that would be the opportunity to implement the detail of the Core Strategy (if adopted). However, the Council's report to the Planning & Development Committee on 23 May 2013 indicated that its *Housing and Economic Development Plan Document* could take up to two years to prepare and that work on the DPD would have to be progressed after the Examination of the Core Strategy has been completed and the Plan adopted. There is no guarantee of this and it is unlikely for the reasons set out in this and other Statements. The Core Strategy should be much clearer about the spatial distribution of development to guide the future Local Plan document as set out in this Statement. Recommended changes have already been set out in this Statement to make the Plan sound and a suitable and sustainable basis for the future Local Plan document.

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?

2.13.1 No. It seems to rely principally upon a review within 5 years, which is unsatisfactory as there is already an acute need to deliver more housing in the Borough (market and affordable) against a clear target to avoid the severe problems that have beset the Council over the last ten years and recently in terms of demonstrating a 5-year supply of housing (to meet NPPF requirements). Housing completions in the last ten years have all missed the target by some distance. This should not be allowed to continue. The Council blames, in large part, the Housing Moratorium between 2004 and 2008 but the NPPF now seeks to boost significantly housing supply, provide a 5-year supply plus buffer (20% in this case) and meet the full, objectively assessed needs for housing. The Council must put rigorous monitoring systems in place to ensure this is achieved, otherwise previous problems of under-supply will prevail with consequent social, economic and other problems.

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On behalf of Barrow Lands Company Limited

5 January 2014

Ribble Valley Borough Council

**Examination of the Ribble Valley Core Strategy
Development Plan Document**

EXAMINATION HEARING STATEMENT

**PREPARED BY DAVID LOCK ASSOCIATES ON BEHALF OF
BARROW LANDS COMPANY LIMITED**



IN RESPECT OF

MATTER 3 – HOUSING

(SCHEDULE OF MATTERS AND ISSUES FOR THE EXAMINATION)

JANUARY 2014

Matter 3 – Housing

Issues

3.1 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?

3.1.1 Ribble Valley Borough Council's ('the Council's or 'RVBC') original housing target was informed by a study undertaken by Nathaniel Lichfield and Partners (NLP) (Supp 4.6) – *Ribble Valley Housing Requirement (2011)*, which was the subject of consultation. We made representations to the Council about the inadequacy of the Borough's housing requirement and despite the increase our objection remains unresolved by the Proposed Changes to the Plan.

3.1.2 The original Draft Core Strategy minimum housing target of 200 dwellings per annum or 4,000 over the Plan period (2008-2028) was adopted by the Council's Planning and Development Committee on 2 February 2012. This was contrary to the advice of the Council's Head of Regeneration and Housing who had regard to the study carried out by NLP – which concluded that 190-220 dwellings per annum was the appropriate level and had recommended a figure of 220 dwellings per annum (or 4,400 over the plan period).

3.1.3 This minimum housing requirement was subject to early scrutiny by an Inspector at the appeal at Henthorn Road, Clitheroe (APP/T2350/A/11/2161186) in March 2012. The Inspector gave limited weight to the Draft Core Strategy and referred to:

'credible and robust evidence to suggest that figure (200 per annum) should be much higher and closer to 330-350 dwellings per year advocated in the uncontested evidence of Mr Nicol'.

3.1.4 The submission of the Draft Core Strategy in September 2012 led to the Inspector raising a number of fundamental concerns about the submitted Plan including the date of the evidence base underpinning the Plan. A further report has been prepared by NLP - "*The implications of the 2011-based CLG Household projections - Ribble Valley Housing Requirement Update*" (30 May 2013) (Post 5.8) - which identifies a range for future housing provision of between 220-280 dwellings per annum (dpa) - and recommending 250 dpa based on constraints.

3.1.5 At this point, we would make two important points on 'constraints':

1. Firstly, in light of the *Hunston* judgement, upheld by the Court of Appeal (see Case No. C1/2013/2734) - in the absence of a housing requirement in a development plan, Paragraph 47 of the NPPF applies and means the decision-maker must look at the fully assessed objective needs not a lower figure based on constraints; this will mean that the Council should be substantially increasing its housing

requirement figure in the Core Strategy and revising its spatial distribution or strategy accordingly to accommodate this need;

2. Secondly, that Core Strategy Inspectors examining plans across the country (e.g. Lichfield, Gravesham, Wiltshire and others) are applying this principle and requiring consistency with the NPPF; they are not finding plans sound that do not make adequate provision for the objectively assessed housing need contained in their own evidence base(s).

- 3.1.6 Returning to the NLP report (2013), it is important to recognise that it indicates that a level of 250 dpa would not address the full economic needs of the Borough identified in the evidence base and the policies of the Plan. Housing need based on the revised economic evidence that was refreshed as part of the update (e.g. *Employment Land Study Refresh 2013* (Post 5.3) generated a housing level of 280 units factoring in envisaged job growth. The Council's Head of Regeneration and Housing in his report to the Planning and Development Committee on 25 June 2013 stated:

'Given the advice in the consultant's report.....a requirement of 250 dwellings could be applied, however this will introduce an element of risk on soundness (my emphasis) should the Inspector holding the Examination find that the lower figure is not fully justified.'

- 3.1.7 The Council's Head of Regeneration and Housing in his report to the Council's Planning and Development Committee on 6 August 2013 again referred to 'an element of risk in not pursuing the 280 [dpa] figure'. The Committee however resolved to amend the Core Strategy to reflect a housing requirement of 5,000 dwellings over the Plan period 2008-2028 with a figure of 250 dpa as the target for new housing in the Borough.

- 3.1.8 We consider that the proposed modification does not go far enough in terms of meeting the objectively assessed housing needs of the Borough and that the Plan is unsound being unjustified, ineffective and inconsistent with national planning policy. The Plan should be amended to make provision for at least 300 dpa or 6,000 homes in the period to 2028.

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

- 3.1.9 The evidence base used by the Council to justify their 5,000 figure is that produced by NLP (on behalf of the Council) entitled "*The implications of the 2011-based CLG Household projections - Ribble Valley Housing Requirement Update*" (30th May 2013). NLP produced three estimates of need for additional households for the period 2011 to 2028 which are then turned into annual dwelling requirements that they recommend are considered by the Council:

1. **Demographic scenario** (Scenario I, Revised PopGroup baseline): 220 dwellings per annum (221 to be precise) which is the NLP estimate of the requirement based purely on demographic projections using a combination of the 2011-based interim CLG projections and 2011 sub-national population projection and the 2011 Census. NLP emphasised that this level of housing provision would not meet the Council's stated economic aspirations.

2. **Jobs growth scenario** (Scenario L, ELR Job Growth): 280 dwellings per annum - which is consistent with the forecast "policy off" latest jobs forecast by Oxford Economics used in the 2013 *Employment Land Review Refresh (2013)*. This assumes growth of 1,600 jobs in the area over the 16 year period 2012 to 2028. NLP state that: 'to ensure there is no disconnect between the housing requirement and the Council's job growth aspirations [i.e. a figure below 280 dwellings per annum]...RVBC would need to demonstrate how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower-growth approach could give rise to'. NLP explain that more weight should be attached to this scenario than the previous employment growth scenarios in their 2011 report as it is based on a 'more up-to-date and robust level of employment growth.'
 3. **Mid point:** without providing a justification or rationale NLP suggest that RVBC consider an upper range figure of 250 dwellings per annum (which happens to be a mid-point between the 220 and 280 dwellings per annum figure). It is this annual figure which is applied over the 20 years 2008 to 2028 to produce the 5,000 figure. This scenario, say NLP 'would also....support some economic growth and would deliver affordable housing to respond to (at least some of) identified needs' (NLP Paragraph 4.31, Page 22).
- 3.1.10 We consider that on the basis of the NLP report and assessment the "objectively assessed need" (NPPF Paragraphs 47 and 182) in the Council's case this must mean 280 new dwellings a year or 5,600 rather than 5,000. This is the scenario that ensures the Core Strategy is internally consistent with housing growth and economic growth fully aligned on NLP's logic and approach. No strong or compelling arguments have been advanced by the Council (or NLP) as to why the annual housing requirement was or should be reduced from 280 to 250.
- 3.1.11 The figure (280 dpa) suggested by NLP is broadly consistent with the 300 dwellings per annum figure proposed by our client in both representations on the Core Strategy and in evidence put forward in support of residential development proposals (up to 504 dwellings and up to 190 dwellings) at Whalley Road, Barrow, which have been the subject of appeals in 2013 and are currently with the Secretary of State for decisions. The housing supply/demand evidence of Mr Stephen Nicol (Regeneris) on behalf of our client was uncontested by the Council on the second appeal (APP/T2350/A/13/2197091) heard at a Hearing on 5-6 November 2013. The difference between the two figures is essentially accounted for by the assumed employment growth rate (we assumed 150 jobs a year; the NLP report assumes 100 jobs per year). For the avoidance of doubt, we remain of the opinion that the minimum appropriate household annual growth requirement for the Borough to adequately take account of demographic change and the likely future needs of the economy should be **in the order of and not less than 300 dwellings per annum**.
- 3.1.12 The Council in their assessment of the NLP jobs growth scenario (in the officers' report of 6th August 2013 on the proposed amendments to the Core Strategy) describe this jobs target as "aspirational", somehow implying that it may be difficult to achieve and one reason for adopting a number lower

than the 280 dwellings per annum. This view is mistaken and misleading for the following reasons:

1. First, the ELR produced in 2013 notes that the 1,600 extra jobs forecast by Oxford Economics is a baseline or “policy off” (not aspirational) forecast. The report identifies a possible aspirational scenario for jobs growth: a “policy on” scenario with the successful roll out and development of the new Enterprise Zone (EZ) at Samlesbury. Under this scenario there would be the creation of an additional 3,300 jobs at the EZ and in the supply chain, or a total rise of 4,900 jobs by 2028. Given the location of the EZ it is likely that many of the jobs there would be filled by residents of other areas (but the ELR suggests that under the “policy on” scenario there would need to be an increase of 3,000 in the number of Ribble Valley residents working).
2. Second, the forecast of 1,600 new jobs or 4.6% from 2012 would, on the basis of any fair assessment, appear to be rather cautious. The ELR points out that this forecast rate of growth is significantly less than the UK growth figure of 8.1% and below the 6.2% increase projected for the North West over the same period. These forecasts appear very cautious given that historically employment growth in Ribble Valley has been in the order of 200 jobs a year excluding the effect of aerospace employment at BAE Systems at Samlesbury.

3.1.13 Our conclusion is that on the basis of evidence already prepared for the Council (by NLP) an annual dwelling requirement of 280 would be the minimum justifiable and this figure is based on future employment growth that is far from being aspirational and indeed is very cautious.

3.1.14 NLP set out very cogently in the evidence base the implications of not pursuing the 280 DPA which is aligned with economic growth policy:

“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, Paragraph 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”.

3.1.15 We do not consider that the Council has demonstrated how these concerns are to be mitigated. NLP largely dismiss the scope for reducing net out commuting and reducing economic inactivity:

“RVBC could meet their job growth projections through changing commuting patterns (i.e. ‘clawing back’ local residents currently commuting out to adjoining settlements); increasing economic activity rates / reducing unemployment (both of which would be very difficult to achieve in Ribble Valley)”.

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

3.1.16 The interim DCLG household projections 2011-2011 project an increase of 1,880 or 188 a year in the Ribble Valley. Taking account of vacancies this is equivalent to around 194 dwellings a year. The NLP 2013 report was updated explicitly to take account of the implications of DCLG interim household projections. These projections were used to help inform the future household growth. As rightly pointed out by NLP the interim projections need to be treated cautiously because:

- They are interim and subject to revision
- They only are available as far as 2021 not beyond
- They are based on a revised view of future household formation rates (the propensity of different ages and gender to form households). The 2011-based interim projections provide a short term view of future household formation rates. NLP note that “as the market recovers the suppressed demand resulting from the recessionary constraints on household formation will simply be unlocked. In particular, this will include people in the 25-44 age brackets (and in many cases seeking to start families) being able to get on the housing ladder and form new households.

3.1.17 NLP model this by assuming that beyond 2021 the longer term trend reductions in headship rates reverts to the 2008-based trends.

3.2 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’?

3.2.1 This is a question primarily for the Council to answer. However, we would make two comments:

1. Firstly, and most importantly, we do not consider that the Council’s intention to undertake a ‘formal review’ of the overall housing requirement within five years should in any way mask the fact that the Core Strategy is not presently ‘sound’ as it fails to meet the full, objectively assessed need for housing within its area. Once a revised housing need figure has been arrived at it will be for the Council to show where and how the need will be met through the Plan. However, we maintain that this additional need can be met in substantial part by naming Barrow as a defined settlement as a receptor for up to 500 new homes in association with the inclusion of the Barrow Enterprise Park as the Borough’s principal employment location (Key Statement DS1). It would not be appropriate to rely on a review of the Plan to meet part of the objectively-assessed need.
2. Secondly, the review should consider what is happening to affordability (house price income ratios) and economic growth as these factors will have a significant bearing on the future housing requirement.

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?

3.3.1 Before commenting on the Standen issues, we would state that we consider the timing of the Council's consideration and resolution to approve the outline planning application for the Standen development at its Planning and Development Committee meeting on 12 December 2013 to be inappropriate, not only because it came just a matter of a few weeks before this Examination but because there were many issues unresolved and concerns from statutory consultees. We considered it prudent to defer consideration of the application pending debate on such issues at this Examination, but that was unfortunately ignored by the Council. We therefore feel that this part of the Examination is in danger of being seriously undermined by the Council's decision.

3.3.2 The allocation of the site on a Policies Map is a matter for the Council but we would make the following comments, which are relevant to the test of 'soundness' of the Plan. Firstly, there is a fundamental and misleading error in the Plan. At Paragraph 4.6, in seeking to justify the 'preferred option' it is stated that *'the strategic site has been reduced in terms of scale of proposed housing....a smaller number of houses would have a positive impact on addressing potential visual impact issues (though detailed work on this would still be needed) and also reduce the impact of potential highway concerns'*. However, Natural England had concerns about the impact of the proposed development within the setting of the Forest of Bowland AONB and also how views from the AONB would be affected. Further, Lancashire County Council (highway authority) also expressed 'serious concern' about only one access to the site, despite the Plan stating on Page 83 that *'the site will be accessed by a minimum of two access points...with a through route for public transport'*. The highway authority felt unable to support the application as submitted due to concerns about the resulting impact upon queuing and delays on the local highway network, including the suitability of Littlemoor Road for buses due to its width, alignment and lack of a continuous footway. These two fundamental requirements underpinning the choice of the strategic site at Standen have therefore failed to be satisfied.

3.3.3 It should also be pointed out that the SA supporting this option made no reference to the size of the site at Standen. Although the number of dwellings was reduced from 1,500 (as proposed in the Council's *Alternative Development Options Consultation Document*) to 1,040, the area of the site actually increased significantly from 30 hectares to 50 hectares (see our representations on the Regulation 19 version of the Plan). Members of the Council were not made aware of this until we drew it to their attention, and the proposal was agreed by Members without an SA.

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?

3.3.4 No. In view of the serious problems that the Council has faced in delivering housing in the Borough over the last ten years we have consistently raised serious concerns about the wisdom of placing over-reliance on one single strategic site because of the potential problems of delivery and sustainability. In proportionate terms, 1040 dwellings at Standen represents 38% of the Council's current remaining housing requirement (5,000) for the period to

2028 (albeit that we contend that this should be increased to at least 6,000 to meet household, demographic and employment aspirations. However, to put this into context, this is more than the combined proposed housing provision in Clitheroe, Whalley and Longridge over the next 14 years. The allocation of Standen adds little, if anything to Clitheroe, has poor sustainability criteria and will fail to deliver the necessary transport infrastructure. It does not accord with the Government's principles of sustainable development and other policies in the NPPF; it will fail to deliver truly sustainable development as required by the NPPF and will not satisfactorily address the Borough's housing requirements. It is therefore not justified, is inconsistent with national policy and hence unsound. All these issues must be reviewed and addressed to make the Plan sound.

- 3.3.5 The Draft Plan at Paragraph 4.7 refers to an annual average provision of 52 units per year for the Standen site (i.e. based upon 1040 dwellings being built over 20 years) but this fails to take into account the fact that some 6 years of the 20 year period have already elapsed, that the outcome of the outline planning application is still in doubt (it is subject to 'departure' procedures and could be 'called-in' by the Secretary of State) and will need to be the subject of reserved matters approvals, all of which may serve to delay the early and effective delivery of this single strategic site.
- 3.3.6 There is uncertainty about delivery. The Council recognises that there are a number of factors that can affect build rates such as quality and location of sites, historic supply in the locality, infrastructure requirements and triggers specific to individual development sites. With a single point of access, the constraints and the configuration of the site, we consider that the likely delivery estimates are optimistic.
- 3.3.7 As recognised in the Committee report, the site requires significant infrastructure to serve such a large development including: a new road junction between Pendle Road and A59, land for a primary school, contributions of up to £4m towards primary and secondary school places, £800k towards sport and leisure, £2.2 towards public transport services along with the provision of an employment area, convenience store, services and community facilities. There are also 'stringent' conditions imposed on the recommendation of United Utilities regarding drainage infrastructure that will require phasing of the development alongside the investment that United Utilities needs to undertake in the drainage infrastructure in Clitheroe. These will all bear on delivery and the draft planning conditions provide no certainty that they will be delivered in the ever decreasing Plan period.
- 3.3.8 We believe this is likely to lead to a delay in the delivery of housing on the site until at least 2015 or even 2016. Much will depend on Standen in relation to total provision and this is too inflexible to deal with changing circumstances in the Borough's housing market. If this development was to stall for some reason, there would be drastic impacts on housing delivery in the Borough, compounding previous housing delivery problems.
- 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?**
- 3.3.9 This is a matter primarily for the Council and the Trustees of Standen Estate. A wide variety of infrastructure is required including: drainage, 30% affordable

housing; 15% housing for the elderly (and mechanisms for its delivery); education contributions (see above); provision of a new primary school site; sports and recreation contributions towards the provision of facilities at Ribblesdale School, Clitheroe; Jubilee Wood (management) and transport (contributions towards the provision of public transport and a Travel Plan).

3.3.10 The delivery of the infrastructure is to be secured via a s106 agreement (yet to be concluded) and via planning conditions on any outline planning permission, which is subject to 'departure' procedures and possible 'call-in' by the Secretary of State.

d. Taking account of the infrastructure and other requirements, is the Standen site financially viable? What evidence is there in this respect?

3.3.11 This is a matter primarily for the Council and the Trustees of Standen Estate. We note the requirements of Key Statements H3 and DMI1 of the Plan, which state that where there is a question of viability the Council will require an open book approach to be taken when agreeing development costs and developers will be required to meet the Council's costs for independent evaluation.

e. Given the need for infrastructure delivery, should phasing of the Standen site be included in the Core Strategy?

3.3.12 Yes. Whilst the Council proposes to cover phasing of the Standen development through planning conditions/s106 agreement, it is considered important to embody this in the Plan to supplement the development management controls to ensure that the required number of dwellings and other land uses are delivered with the necessary supporting infrastructure, both within and off-site.

3.3.13 In relation to Standen, the Council's Infrastructure Plan (Supp 6.4) merely repeats what is in the Draft Core Strategy. It refers to the site being accessed by a minimum (our emphasis) of two access points from the existing local highway network with a through route for public transport, which is not the case with the outline application and has led to concerns from the Highway Authority about the scale of development and its impacts with a single access point off the Pendle Road which is rural/semi-rural in character.

f. Aside from housing, what other uses are anticipated on the Standen site?

Chapter 9 of the Plan states that uses will be predominantly residential (including affordable housing) but will also include employment (B1 uses), land for a primary school, community and open space/recreational uses with new and enhanced provision for sustainable and active transport to maximise connections to the Clitheroe urban area. It is unfortunate that the access strategy has failed to meet the expectations of the Plan.

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?

3.4.1 This is a question for the Council to answer.

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?

3.4.2 This is a question for the Council to answer.

c. How has the proportional split between the settlements been arrived at? What justifies this distribution?

3.4.3 This is primarily a matter for the Council. However, we consider that the Council's spatial development strategy is based on a crude distribution of development that accords with population size and distribution, which seriously overlooks the locational advantages of Barrow, which would be a suitable receptor for development and should be named as such by using more sophisticated indicators of sustainability, such as:

- Employment contribution
- Sustainable travel patterns
- Ability to successfully absorb additional, quality development
- Lack of environmental constraints
- Strategic location in relation to other settlements and the Borough overall
- Accessibility
- Potential contribution to affordable housing
- Potential to sustain and improve existing services

d. What is the justification for the 'Longridge adjustment'? Is the proposed re-apportionment across the 'other settlements' (excluding Clitheroe and Whalley) the most appropriate course [of action]?

3.4.4 This is a matter primarily for the Council to deal with but we have no objection to the apportionment of the 'Longridge adjustment' across the 'other settlements' except insofar as set out below in Paragraphs 3.4.5 – 3.4.9.

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?

3.4.5 The Plan is extremely vague about this and uses a crude average across the 'other settlements' equating to 45 dwellings per settlement and stating that 'actual provision will be a matter for the allocations process'; the Housing and Economic DPD has yet to be started due to delays with the Core Strategy.

3.4.6 No detailed analysis has been undertaken by the Council to establish the capacity of 'other settlements' to suitably and sustainably accommodate an average of 45 dwellings.

3.4.7 We consider that Barrow should be included in the Plan as a specific settlement named as being a receptor for housing growth, to accompany the development planned at the Barrow Enterprise Park, to link jobs and homes, reduce travel by car, utilise its good accessibility and support service provision.

3.4.8 The additional benefits of this are as follows:

1. Barrow is unlike the 'other settlements' in that it is an industrial village that is rare in this otherwise rural part of Lancashire;
2. Barrow is named as an 'other settlement' and being specifically identified would not affect the spatial strategy for the three main settlements and Standen;
3. Housing at Barrow provides a strong link to the Core Strategy's principal strategic employment location at the Barrow Enterprise Park, an asset and a benefit that no 'other settlement' can claim;
4. The Council's latest SHLAA (2013) supports strategic scale development at Barrow;
5. The broad location was included as Option E in the Council's consultation on the *Generation of Alternative Development Strategy Options* as capable of delivering a high-quality sustainable development;
6. Such an approach could positively assist the spatial strategy by steering development in a positive, proactive and clear way to a sustainable location, relieving pressure on 'other settlements' where delivery may prove problematic (see Appendix xx) due to environmental and other constraints;
7. Barrow is unconstrained by any designations and has few environmental or physical constraints, unlike Standen and most of the 'other settlements';
8. It does not however prevent housing coming forward in these other settlements should this be possible and desirable given their numerous environmental constraints;

3.4.9 The Council's spatial strategy in terms of 'other settlements' sees them taking housing development proportionate to their size; the recent growth of Barrow in a way not anticipated by the Draft Core Strategy and the increased housing needs of the Borough means that the proportion of general and 'other settlement' housing that Barrow can (and should) accommodate has increased. This is perfectly acceptable in our view as it is the Borough's principal strategic employment location and has seen numerous consents granted for residential, industrial and commercial developments that reflect its sustainable location, unique characteristics and different scale to the rest of the 'other settlements'.

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

3.4.10 We understand that 'other settlements' are those referred to as 'defined settlements' under Key Statement DS1 on page 39 of the Plan. No proper sustainability appraisal has been undertaken of the relative merits of the

various settlements for accommodating development. The Council chooses to rely upon the statement in the Plan that ‘in allocating development, the Council will have regard to the AONB, Green Belt and similar designations when establishing the scale, extent and form of development to be allocated under this policy.’ We consider that this is vague, unclear, unsupported by evidence and unsound as a basis for distributing a considerable proportion of the Borough’s housing and again overlooks the sustainability and employment benefits of Barrow as a suitable location for housing growth.

3.5 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?

3.5.1 No. The Council has accepted (at our client’s appeal Hearing in November 2013) that as of October 2013 it could not demonstrate a 5-year supply of housing land (as required by Paragraph 47 of the NPPF) and that the housing land supply figure stood at 4.34 years using a 20% buffer (not 5%) due to persistent under-delivery.

3.6 In the light of Paragraph 47 of the NPPF, should the buffer be 20%? Are there sufficient deliverable sites to provide a 20% buffer?

3.6.1 Yes, the buffer should be 20% due to the poor delivery in the Borough over many years against even low housing targets. See table below. No there are insufficient sites to provide a 20% buffer.

<i>Year</i>	<i>New Build</i>	<i>Conversions/CoU</i>	<i>Total</i>
2003/04	237	50	287
2004/05	144	60	204
2005/06	92	73	165
2006/07	51	32	83
2007/08	34	25	59
2008/09	58	17	75
2009/10	57	32	89
2010/11	36	36	69
2011/12	116	31	147
2012/13	121	51	172

3.6.2 The Council has accepted this. Over the five years 2008 to 2012 the average completions have run at 110 per year, far below the previous RSS target of 161 dwellings per annum, previous Core Strategy target of 200 dpa and current inadequate target of 250 dpa.

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

3.7.1 This needs to be demonstrated by the Council; we do not consider, however, that the Council can satisfactorily show this, even following the SHLAA Update.

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

3.8.1 No, for reasons already set out in this and other Hearing Statements produced on behalf of our clients.

3.9 What reliance, if any, is placed on windfall sites in the housing land supply?

3.9.1 This is a question to be answered by the Council; in the past the Council's 5-year housing land supply has been heavily reliant on windfall sites due to the fact that the Local Plan is so out-of-date. The NPPF requires that the 5 year supply (including the buffer) must consist of sites that are both "*specific and deliverable*". By specific, NPPF means that the LPA need to identify the sites and not rely for instance on a large element of (unidentified) windfall sites.

3.10 What approach does the Plan take to housing density? How does this reflect local circumstances?

3.10.1 The Plan makes only a few general references to density in Policies DMG1 and DME1 of the Plan.

3.11 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?

3.11.1 This is a question to be answered by the Council; there are very few references to the use of brownfield land in the Plan, except in relation to employment use (Key Statement EC1), which is presumably a reflection of the fact that the Borough is largely rural or agricultural in character.

3.12 Should the expected rate of market and affordable housing delivery through the Plan period be illustrated by a housing trajectory in the Plan?

3.12.1 We consider that it should but feel that it would make little practical difference to the delivery of housing in the Borough, which has suffered principally through under-provision for the last ten years.

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3 January 2014

Ribble Valley Borough Council

**Examination of the Ribble Valley Core Strategy
Development Plan Document**

EXAMINATION HEARING STATEMENT

**PREPARED BY DAVID LOCK ASSOCIATES ON BEHALF OF
BARROW LANDS COMPANY LIMITED**



IN RESPECT OF

MATTER 4 – AFFORDABLE HOUSING AND HOUSING FOR THE ELDERLY

(SCHEDULE OF MATTERS AND ISSUES FOR THE EXAMINATION)

JANUARY 2014

Matter 4 – Affordable housing and housing for the elderly

Issues

4.1 What is the objectively assessed need for affordable housing?

4.1.1 The Council's updated *Strategic Housing Market Assessment (SHMA) 2013*, by HDH Planning and Development (Post 5.7), indicates that the CLG Practice Guidance (*Strategic Housing Market Assessment Practice Guidance, August 2007*) estimate of affordable need in the Borough is 404 dwellings per year compared to 264 dwellings per year identified in the 2008 SHMA report (Supp 4.11). This shows a clear and significant increase in affordable housing need in the Borough, which is a major issue for the Council. However, we believe that this increase is hardly surprising given the very low rate of new house building (and affordable home provision, with just 29 in 2012/13 according to the Council's figures) in the area since 2008. See Table 1 below using the Council's own figures.

Year	Completions
2008-09	39
2009-10	43
2010-11	27
2011-12	61
2012-13	29

Table 1 - Affordable Housing Completions in RVBC

4.1.2 The affordable housing issue is acute and is a key concern of the Council. The Core Strategy contains numerous references to affordable housing need:

One of the seven key issues and challenges is "*high and unaffordable house prices*" (as indeed is the related issue of "*loss of the young population from the borough*") (Our emphasis).

4.1.3 It states as part of its vision that "*the supply of affordable and decent homes in the borough will be matched with the identified housing need and there will be a suitable proportion of housing meeting local needs. Neighbourhoods in the Ribble Valley will be sought after locations by building cohesive communities, promoting community safety and considering access for all by ensuring that no group is prevented from accessing mainstream services and facilities. The housing market will have opened up for the younger population, which, combined with improved employment opportunities, will have resulted in a reduced proportion of the young generation leaving the borough to access cheaper and suitable housing and employment opportunities*".

4.1.4 One of strategic objectives (Para 3.12) was to "*match the supply of affordable and decent homes in the borough with the identified housing need*". This is proposed to be changed to '*To increase the supply of affordable and decent homes in the borough to help meet identified needs*', which is a subtle but significant change and sets the context for our

comments and our concerns that the Plan is unsound as it fails to meet the full, objectively assessed needs for market and (our emphasis) affordable housing in the housing market area. This is unacceptable on many levels and can only be addressed by significantly increasing the housing requirements for both market and affordable housing in the Plan (as set out in this and our other Statements).

4.1.5 The key conclusion is that the lack of affordable housing remains a pressing issue in the Ribble Valley and the latest evidence suggests that the position has worsened over the last 5 years due to the lack of new build supply. This simply reinforces our serious concerns about continued under-supply and under-provision of housing in the Borough, which must be stopped.

4.2 What level of affordable housing does the Plan anticipate being delivered over the Plan period?

4.2.1 This is unclear from the Plan as submitted for examination. Whilst Key Statement H3 seeks a contribution of 30% affordable housing from qualifying residential developments, no overall target or level of affordable housing is set out or justified in the actual Plan.

4.2.2 The Council seems to work on the crude principle that the overall housing requirement set in the Core Strategy will support the delivery of affordable housing; hence, a level of 250 dwellings per annum would help deliver in the order of 75 affordable housing units per year at the Council's established affordable housing target of 30%.

4.2.3 HDH Planning and Development (the Council's consultants) have attempted to apply local assumptions to the CLG calculation to generate what they see as a more "realistic" level of affordable housing (114 dwellings) to be provided not the actual need.

4.2.4 The updated SHMA (Paragraph 5.53 on page 54) suggests that the 'need' figure does not equal the number of new affordable units that need to be built each year (i.e. proposed supply). The report implies that affordable housing 'need' will be met through a wide range of sources – for example by making better use of vacant stock, by making better use of the existing stock or through the private rented sector. However, in reality these sources have made a minimal or a negligible contribution towards meeting affordable housing needs in the Borough. In our client's appeal (Inquiry into APP/T2350/A/13/2190088/NWF), the Council's Head of Regeneration and Housing (Mr Colin Hirst) under cross-examination accepted that these sources had made a negligible contribution to supply and that 'the main show in town' was new build. Thus, in reality, affordable housing will principally be provided in association with qualifying market housing schemes. There is a pressing need to increase the overall housing requirement in the Borough for both market and affordable units.

4.2.5 The Council's target for affordable housing provision (75 units per annum) is considerably less than the actual objectively assessed need - which is rising - and only 65% of the adjusted annualised requirement suggested in the updated SHMA (114 units). Furthermore, the Council sees it as "clearly aspirational with regard to what has been delivered over recent years". This is disappointing since affordable housing provision in the Borough has been extremely poor in recent years and the Council's approach shows little sign

of significantly improving matters or coming anywhere near close to meeting the Council's vision and stated objectives in the Plan and other related documents. The lack of ambition and commitment by the Council to truly address the affordable housing problem in the Borough is revealed (P&D Committee report of 6 August 2013) when it states that "it is considered unrealistic to be expecting a higher level of affordable housing to be capable of being delivered in reality." The Council's answer to this is to keep the matter "under review" and take account of in the review period. This is unacceptable as it will simply lead to the acute housing need further increasing with consequent social, economic and other consequences. There are almost 1.8 million households on English local authority housing registers and significant levels of overcrowding in the private and social housing stock. Poor housing impacts directly on residents' health and educational attainment, while difficulties in accessing affordable housing can also limit the ability of people to move to find work. The need to increase the supply of housing and tackle affordability issues is a key housing policy issue. This is not only our view but that contained in a Briefing Paper for Parliament by the House of Commons Library Research. http://www.parliament.uk/documents/commons/lib/research/key_issues/Key-Issues-Housing-supply-and-demand.pdf

4.2.6 The annual affordable housing requirement in the Ribble Valley will continue to grow significantly year-on-year unless the Council fundamentally reconsiders (i.e. substantially increases) its housing requirement and produces a significant improvement in delivery and affordability; this must be done quickly to avoid the vast shortfall getting any greater, and with an emphasis on short-term deliverability to start making serious in-roads into the severe shortage of affordable (and other) housing in the Borough.

4.2.7 As it stands, the Plan proposes a continued under-provision of both market and affordable housing. This is unsound as it: fails the 'positively prepared' test of soundness by not meeting objectively assessed needs (Paragraph 182 of the NPPF); is unjustified, since it is not the most appropriate strategy based on the evidence; is ineffective in delivering the housing that people need; and is inconsistent with national policy (Paragraphs 47 and 159 of the NPPF). Furthermore, it would be inconsistent with a key priority of the Council's *Sustainable Community Strategy 2007-2013*, *Corporate Strategy 2011-2015* and *Housing Strategy*, which is to maximise the supply of appropriate affordable housing and will do nothing to help reduce the very severe adverse social impacts resulting from under-provision of such housing over a long period in the Borough.

4.3 Key Statement H3 seeks from residential developments a contribution of 30% affordable housing. Two site size thresholds are given.

a. How does the evidence justify the proportion of affordable housing sought and the two site size thresholds?

4.3.1 This is a question for the Council to answer.

b. Is there a risk that this requirement will render schemes unviable?

4.3.2 The Council's viability study (Post 5.10) suggests that the Core Strategy policies (on a whole plan basis) do not make development unviable and the

objectives of the Strategy are capable of being delivered. Nevertheless, we consider (and this is accepted in Post 5.10) that each proposal will still need to be considered on its merits in terms of detailed viability through the development management or site allocations process, in accordance with Paragraph 173 of the NPPF.

c. Will the application of Key Statement H3 deliver the amount of affordable housing needed in the places where it is needed?

4.3.3 This is primarily a question for the Council to answer. However, in light of our earlier comments in this Statement we consider that the application of Key Statement H3 will fail to deliver the quantum and meet the spatial requirements for affordable housing in the Borough. The Council has previously taken a parish-based approach to assessing housing need. Parish Housing Needs Surveys were undertaken across most of the borough and gave an indication of the types and sizes of housing most urgently required, and where the greatest aggregate demand for housing was likely to be. This was referred to in the previous SHMA (2008) - deemed out-of-date by the Inspector - but is not carried through in the updated SHMA (2013). The Council's approach to delivering the amount of affordable housing in the places it is needed is crudely based around development in the larger settlements (based on population size), on a proportionate basis, based on new-build secured from qualifying residential developments. This approach offers no guarantee of meeting the following requirements of the NPPF:

'by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; [para 7]

'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. 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' [para 17].

4.3.4 This is exacerbated by the fact that according to the *Pennine Lancashire Housing Strategy 2009 – 2029* affordable housing needs are more widespread in the Ribble Valley. According to the SHMA (2008) the Ribble Valley is a high income area, with large numbers in managerial and professional grades. As a result it has become increasingly difficult to afford housing in Ribble Valley. Official calculations of affordability show that it has become a severe problem, with a ratio of house price to income of 8:1 at the lower quartile level (to approximate market entry stage) and 7.7 at the median average level. Affordability is most pressing in rural communities, although even the most 'affordable' locations have price to income ratios of at least 4:1. The Council's approach does little to address these problems and is unsound as a result. It could only be made sound by increasing provision and a more proactive approach towards meeting the needs of people in housing need in the Borough.

4.4 Key Statement H3 also requires 15% of the units in housing developments to be for elderly people.

a. What is the need for housing for the elderly and how will this requirement meet that need?

4.4.1 The Council's evidence base for this is unclear. There are occasional references in various documents (e.g. *Addressing Housing Need in Ribble*

Valley 2011)(Sup 4.7), which indicate that Ribble Valley has an ageing population, which is projected to increase by 49% in the next 15 years but this is not adequately covered or justified in the updated SHMA, 2013 or NLP Housing Requirement Update (Post 5.8). Equally, there is insufficient evidence to show how the requirement will meet the need.

b. How does the evidence justify this proportion?

4.4.2 We consider that there is a lack of evidence to justify this proportion. In Sup 4.7 the Council indicates that the market has failed to meet the housing needs of older people (i.e. bungalows) and therefore seeks to secure accommodation appropriate for older people to be delivered through section 106 agreements. The Council needs to produce the evidence to support this proportion and justify its Key Statements and Policies.

c. Will this requirement apply to all housing schemes, or is a site size threshold intended?

4.4.3 This is not clear from the Plan. In Sup 4.7, the requirement is for 15% of the units to be bungalows for the elderly to be achieved by;

- on sites of 30 units or more a requirement for 15% to be for the elderly;
- of the 15% elderly accommodation a minimum of 50% would be affordable and included within the affordable offer of 30%;
- The remaining 50% of the elderly accommodation could be market housing be sold at market value or rent.

4.4.4 This, however, is not justified or reflected in the Plan, which seems to apply no site threshold, which is confusing and conflicts with the guidance in Sup 4.7. The Plan should be amended to include the site thresholds that can be justified by evidence and meet the need for housing for older people.

d. Is there a risk that this requirement, combined with that in relation to affordable housing, will render schemes unviable?

4.4.5 This is a question to be answered by the Council. We refer to our previous comments under 4.3.2 of this Statement.

4.5 Paragraph 6.6 of the Plan says that thresholds may change as and when new, updated information is available. How is it intended that the thresholds in the Key Statement will change?

4.5.1 This is a question to be answered by the Council. However, Paragraph 6.6 states that thresholds have been determined from data presented by the 2008 SHMA. The updated SHMA 2013 states (at Paragraph 7.10) that this evidence suggests that the current target is appropriate, although if a significant number of new dwellings come forward on sites that are below the thresholds set out in the Core Strategy and are therefore not covered under the current policy, then the Council must provide other mechanisms to ensure that these smaller developments also contribute to the overall market/affordable mix required across Ribble Valley. There is no indication as to what these 'other mechanisms' might be. This needs to be addressed by the Council in the Plan and not simply defer a decision to a future review.

*RVBC Core Strategy Examination
Matter 4 – Affordable housing & housing
for the elderly*

*Barrow Lands Company Limited
Examination Written Statement*

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3 January 2013