

Ribble Valley BC Core Strategy: Inspector's Matters and Issues

NJL Consulting, on behalf of Strategic Land Group

Matter 1 – Basis for the overall approach

Issues

- 1.1 We do not believe that the plan has been based on the *'testing of reasonable alternatives.'* In our previous submissions, we have made clear our significant doubts as to the ability of the Standen Strategic Site to deliver the mix of uses that the Core Strategy requires, and in particular the number of homes, within the plan period (and even at all).

Since our previous submission in September 2013, RVBC's planning committee has confirmed they are minded to approve an outline application for the Standen Strategic Site. The committee report for that application makes clear that there are still fundamental doubts as to whether the Standen Strategic Site can deliver as intended (and which are covered in more detail in our response to Issue 3.3).

Despite these reservations, RVBC have at no stage considered any alternatives to the Standen Strategic Site in Clitheroe, although such alternatives exist. The strategic site is expected to deliver over 20% of the housing requirement for RVBC as a whole. Given its over-riding importance to achieving the Core Strategy objectives, it is a significant failing of the process that no alternatives in Clitheroe were investigated or explored. One such alternative, the South Clitheroe Sustainable Urban Extension, is detailed at Appendix A.

It is not, therefore, considered that the plan has been justified and it is consequently unsound. To rectify that shortcoming, further consultation should be carried out to consider alternatives to the Standen Strategic Site.

Ribble Valley BC Core Strategy: Inspector's Matters and Issues

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Matter 2 – The strategy

Issues

- 2.2 It is our belief that the Plan will not deliver the homes, jobs and services required to meet the needs of the whole borough. There is a symbiotic relationship between homes and jobs. Providing more jobs requires a larger labour pool which requires more homes. Those new homes (and residents) help support services and facilities which in turn generates more jobs.

In order to support the anticipated level of job growth over the plan period, the *'Defining a Local Housing Requirement: Update 2013'* report makes clear that 280 dwellings per annum would need to be delivered. This is, in part, due to the aging population in RVBC which acts as a drag on economic performance.

To justify a lower figure, paragraph 4.26 of the Housing Study makes clear that either:

- The adverse housing, economic and other outcomes would need to be mitigated, or;
- Neighbouring authorities would be required to deliver additional homes to support RVBC's needs.

No such justification or mitigation has been provided.

Furthermore, concerns over the ability of the Standen Strategic Site to deliver during the plan period (if at all) put the proposed strategy into serious doubt. This is considered in more detail at Issue 3.3b.

Consequently, the plan is neither positively prepared nor justified in this regard and must be considered unsound.

- 2.3 In broad terms, the proportionate distribution of new development across the three main settlements is supported. To ensure that the housing requirement can be delivered, we would recommend that some flexibility is built into the figures for each settlement.
- 2.11 While a Viability Study has been prepared considering the impacts of the Core Strategy, it has not been demonstrated that the Plan is capable of viably delivering. Although the Viability Study considers a variety of different types of development site, it does not specifically consider the Standen Strategic Site.

Standen is materially different to the other sites considered in the Study, particularly with regard to the off-site infrastructure requirements. The approach taken in the Viability Study is also contrary to the Department for Communities and Local Government '*Community Infrastructure Levy: Guidance*' published in April 2013 ('CLG Guidance'). Paragraph 27 of the CLG Guidance recommends that viability work focuses on those sites which are strategically important to the plan. However, in this case there is no evidence that 20% of the housing requirement for RVBC can be viably delivered.

As the Standen Strategic Site has not been specifically assessed in the Viability Study, the plan is not properly justified and must therefore be considered unsound.

To resolve this, we would recommend that a viability assessment of the Standen Strategic Site is carried out and made available for comment. If this reveals that Standen cannot viably deliver, alternative strategic sites could then be considered.

Ribble Valley BC Core Strategy: Inspector's Matters and Issues

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Matter 3 – Housing

Issues

- 3.1 a While we welcome the intention to increase the housing requirement to 250 dwellings per annum, we still do not believe that the revised requirement will meet the objectively assessed need for new homes as required by national policy. The reasons for this view are set out in our response to Issue 3.1 b.

It is of concern that Main Change 8 proposes to re-cast the housing requirement as a target, rather than a minimum requirement. This is contrary to the requirements of paragraph 47 of the NPPF to boost significantly the supply of housing.

In order to ensure that plan can be considered sound, 'Key Statement H1: Housing Provision' should be revised to read:

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

- 3.1 b The proposed increase in the housing requirement is based upon the NLP study carried out on behalf of RVBC titled '*Defining a Local Housing Requirement: Update 2013*' ('Housing Paper'). Whilst it is considered that this is generally a reliable source of evidence, we have previously identified a number of concerns with both the methodology and the conclusions which remain unaddressed.

Economic Activity: As was outlined in our response to Issue 2.2, the proposed housing requirement does not take into account the anticipated level of economic growth. Paragraph 4.22 of the Housing Paper notes that 280 dwellings per annum (5,600 homes in total) would be needed to support the anticipated level of jobs growth given the ageing population.

Affordable Homes: The 2013 SHMA identifies an affordable housing need in RVBC of 404 dwellings per annum, significantly higher than the proposed annual average requirement. Despite this evidence of acute housing need, no compensatory adjustment has been made to the housing requirement. If just 25% of that affordable housing need were to be met each year, and with a viable level of affordable housing provision of 30% of the dwellings on any given site, then the housing requirement would need be 337 dwellings per annum.

The appropriateness of such an adjustment is set out in the draft National Planning Practice Guidance. Paragraph ID 2a-020-130729 states:

The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be.

Constrained Figure: The only justification given for proposing a housing requirement below that required to meet the anticipated level of jobs growth is that the figure reflects environmental constraints (paragraph 4.25 of the Housing Paper) and historic delivery rates (paragraph 4.24 of the Housing Paper). Neither justification is appropriate.

The inappropriateness of reflecting constraints on delivery when assessing the housing requirement was confirmed in an appeal decision in Torbay (X1165/A/11/2165846) in April 2012:

I do not share the Council's view that constraints on growth should play any part in establishing the housing requirement. Such constraints do not bear upon the actual need for dwellings, but rather upon the arrangements for their provision.

The correctness of this Inspectors view was confirmed in a High Court Judgement in September 2013 ([2013] EWHC 2678).

Nor is the past record of delivery of relevance. The quoted historic rate covers a period up until 2004 and is designed to strip out the impacts of the recent housing moratorium. This figure is not, therefore, reflective of the market's ability to deliver at the present time (in particular given the improved viability of development of brownfield sites given the unprecedented increase in house prices since that time). Secondly, that number of homes was delivered at a time when the policy backdrop was the Joint Lancashire Structure Plan which required the delivery of just 160 dwellings per annum.

Similar points are made in the draft National Planning Practice Guidance at paragraph ID 2a-004-130729:

Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance infrastructure or environmental constraints.

RVBC should first determine the actual housing need and then plan to deliver it. This might include reviewing existing settlement boundaries, allocating further strategic sites, planning to deliver more infrastructure to unlock additional development sites, or even reaching agreement with neighbouring authorities for them to deliver more homes. Unilaterally reducing the housing requirement is not an acceptable approach.

Demolition: No allowance has been made for demolition of dwellings in the Housing Paper.

On that basis, the housing requirement is considered to be too low. This section is therefore neither justified nor positively prepared and the Plan should be found unsound.

In order to remedy these shortcomings, the housing requirement should be increased to a minimum of 280 dwellings per annum, with further increases to reflect the acute need for affordable homes.

- 3.1 c The 2011 projections have been used in the Housing Paper but with a number of caveats. The shortcomings of these projections have been well documented, and in particular the distorting effects of the recession on headship rates. Consequently, the figures are likely to represent an underestimate of the actual housing need. This view was recently confirmed by the Inspector considering the Lichfield Local Plan.

The draft National Planning Practice Guidance makes similar observations about the use of the projections, observing at paragraph ID 2a-015-130729 that:

They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

The same paragraph goes on to say:

The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing.

On that basis, and in order to ensure the housing requirement is justified (and therefore sound), it would seem appropriate to apply an upwards adjustment on the 2011 projections figure, especially in the period post-2021.

- 3.3 b If so much reliance is to be placed on a single site, RVBC must be absolutely confident it can deliver. However, in our previous submissions we have outlined the significant concerns over the ability of Standen to deliver. Despite the recent committee resolution to grant permission for the site, subject to a S106 Agreement, a number of those concerns remain. The most significant of those concerns are summarised here.

Density of Development:

No evidence has been provided that the number of homes proposed can actually fit within the red line boundary of the site. The approximate size of the site as identified in the Design & Access Statement accompanying the application as 50.1ha. Even if the whole site area could be developed in its entirety with new homes, this would

result in a density of approximately 21 dwellings per hectare (dph).

Yet in addition to the areas of residential development, the following uses have been incorporated:

- Proposed school site (amounting to 2.1ha).
- Proposed employment site (amounting to 2.25ha).
- Neighbourhood retail centre, fronting Pendle Road (amounting to 0.5ha)
- Stand-off from the route of the Roman Road.
- Buffer to Pendleton Brook and the smaller brook crossing the site.
- The provision of a new watercourse through the site as part of the proposed drainage system.
- Three identified play areas at various locations with the site.

Despite this, the masterplan does not identify the total area of the site that is to be set aside for residential development.

The net area of the residential development can be estimated as 28ha by measuring the approximate areas of the developable parcels as identified on the masterplan. Already, this is a 40% reduction in the area of the site, and would result in a density of some 37 dph. This appears optimistic compared with a density of 33 dwellings per net hectare on the 8.27ha, 270 dwelling site to the west of Henthorn Road in Clitheroe which provides the best comparable as to what the market is likely able to deliver in the Clitheroe area. The expected density at Standen would be some 10% higher.

However, this estimate of the developable area of the site appears to be rather generous as a number of issues which will impact on the developable area have not been reflected in the Masterplan. In particular, the route of the Roman Road has not been respected, with the committee report identifying a requirement for further archaeological works. Similarly, English Heritage have concerns regarding the potential impact on the setting of the Listed Standen Hall, which could also reduce developable area. The areas of open space are primarily located to the rear of the site and would presumably not be delivered until well into the life of the development – as they are located on marshland, moving the open space forward would not simply free up space elsewhere but would instead impact on the developable area.

Deliverability:

The proposals rely on an over-ambitious build rate that is not supported by evidence. The committee report states that '*the applicants have confirmed as recently as 25 September 2013 that house completions are likely to be higher than the 30 per year per builder (90 per year overall) that was estimated when the application was lodged in 2012. They have stated that they believe a sensible range for this site would be 30-50 per year per builder*'. While the applicant may have asserted that, they are not a developer and the statement is not grounded in fact.

In the first 6 months of 2013, the top 8 housebuilders delivered, on average, 33

dwellings per outlet per annum. All the main PLC developers have stated their intention not to chase volume in the coming years. There is therefore no evidence to suggest a deliver rate as high as 50 dwellings per annum per developer. As the site has yet to secure an Outline Permission and there are already just 15 years left in the plan period, it seems inconceivable that the scheme will deliver during the plan period if realistic build rates are used.

Even if those build rates could be achieved, Lancashire County Council raised concerns during the course of the application as to whether the proposed single access strategy could be made to work.

Finally, as covered in Issue 2.11, the Viability Study does not consider the site and therefore there is no evidence as to whether or not the site can viably deliver.

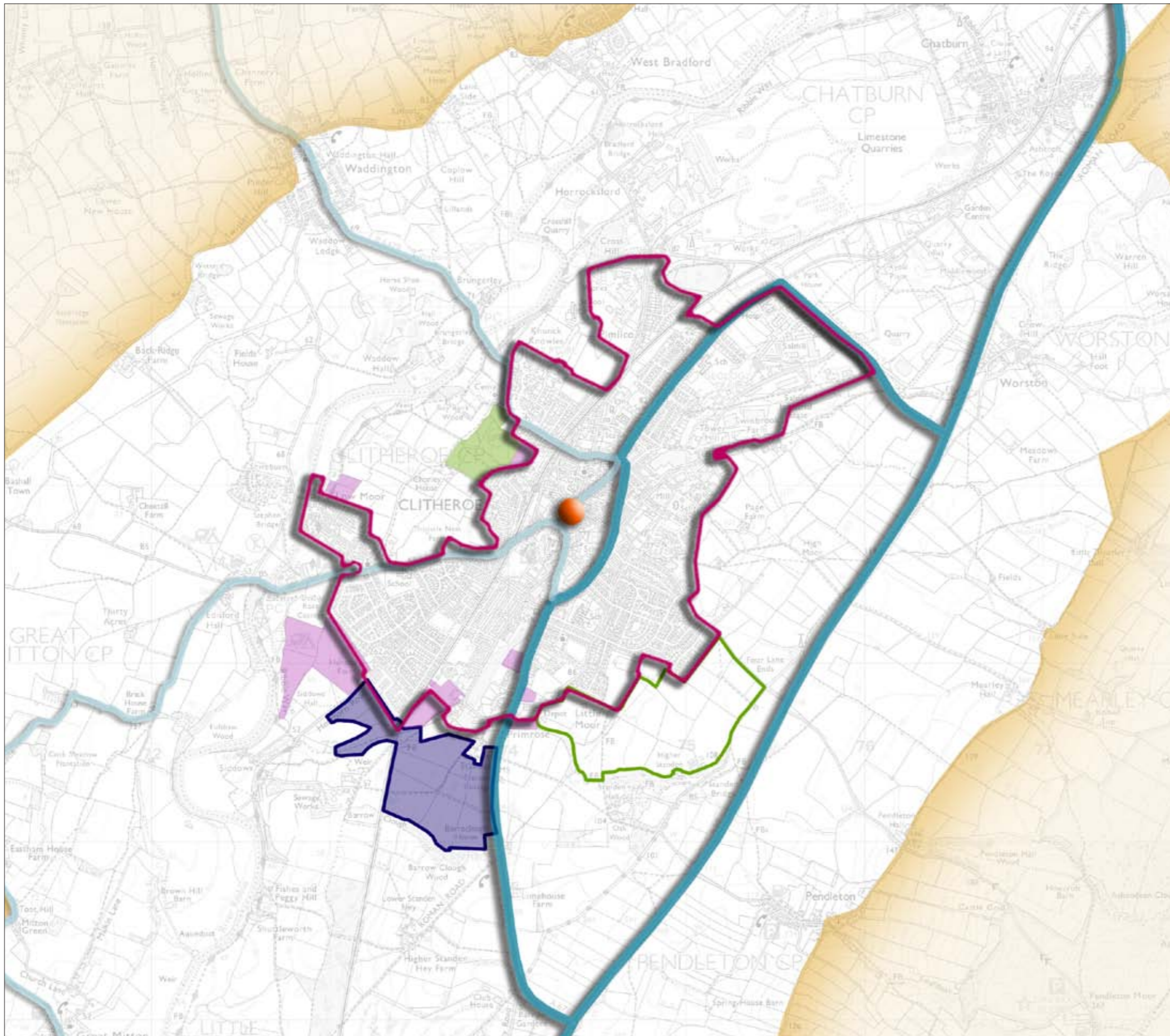
Given these significant concerns over the ability of Standen to deliver the number of homes proposed over the plan period (if at all), the Plan cannot be considered to be justified or effective and is therefore unsound.

In order to ensure that the plan can be considered sound, alternatives to Standen should be fully explored and an appropriate fall-back position put in place to cover the likely eventuality the Standen will not deliver as expected.

- 3.3 d There is no evidence to demonstrate that the Standen Strategic Site is viable. The Viability Study considers a variety of types and sizes of development sites, but does not specifically consider the viability of Standen.
- 3.10 Please refer to our comments regarding the proposed density of the Standen Strategic Site in response to Issue 3.3 b.

Ribble Valley BC Core Strategy: Inspector's Matters and Issues

Appendix A: South Clitheroe Sustainable Urban Extension



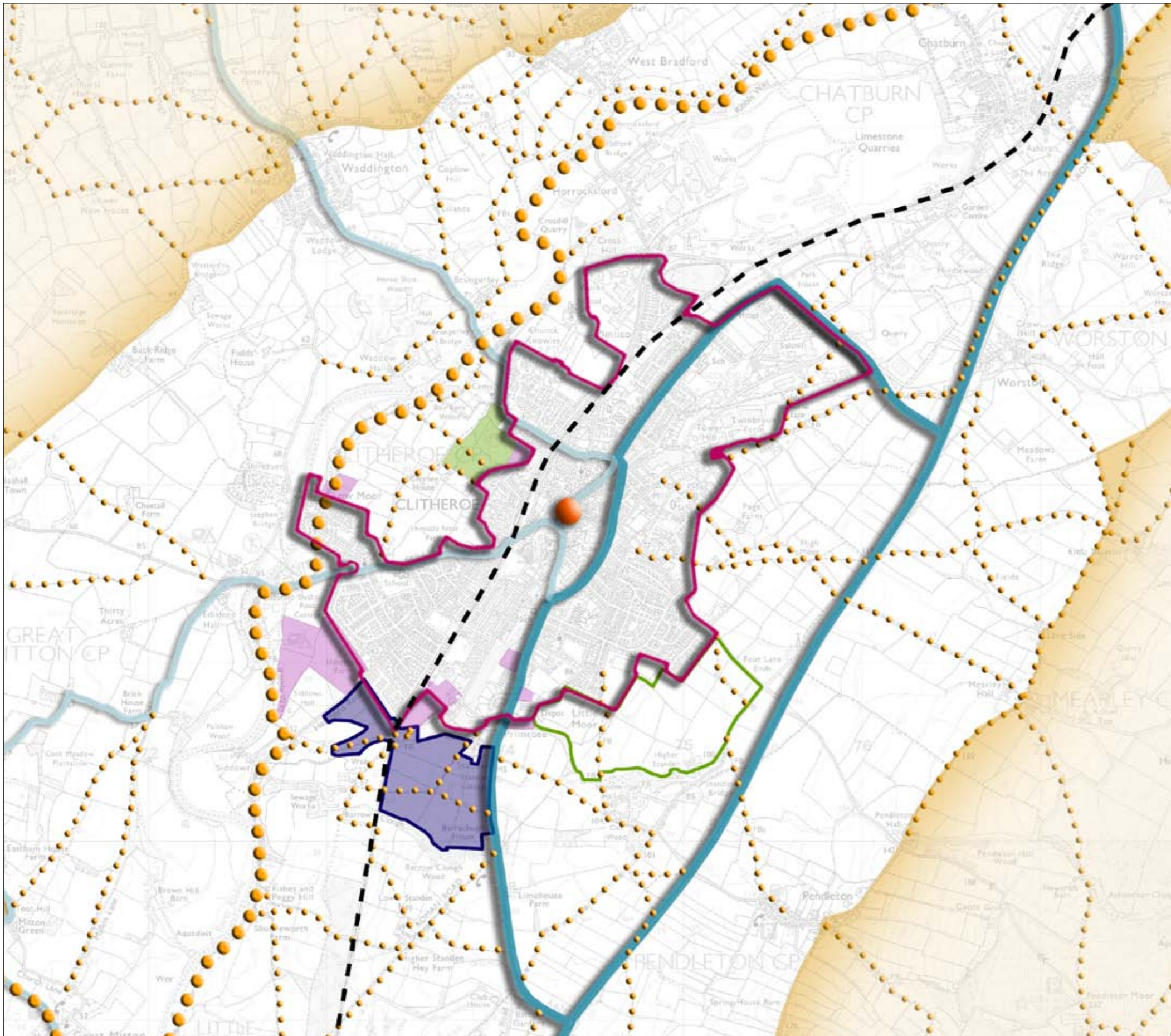
- Key**
- Settlement Boundary 
 - Major A Roads 
 - Minor B Roads 
 - AONB 
 - Known Planning Permissions 
 - Potential Planning Permissions 
 - Standen Site 
 - Henthorne Site 



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Figure 1
Clitheroe Settlement

South Clitheroe Sustainable
Urban Extension - Masterplan

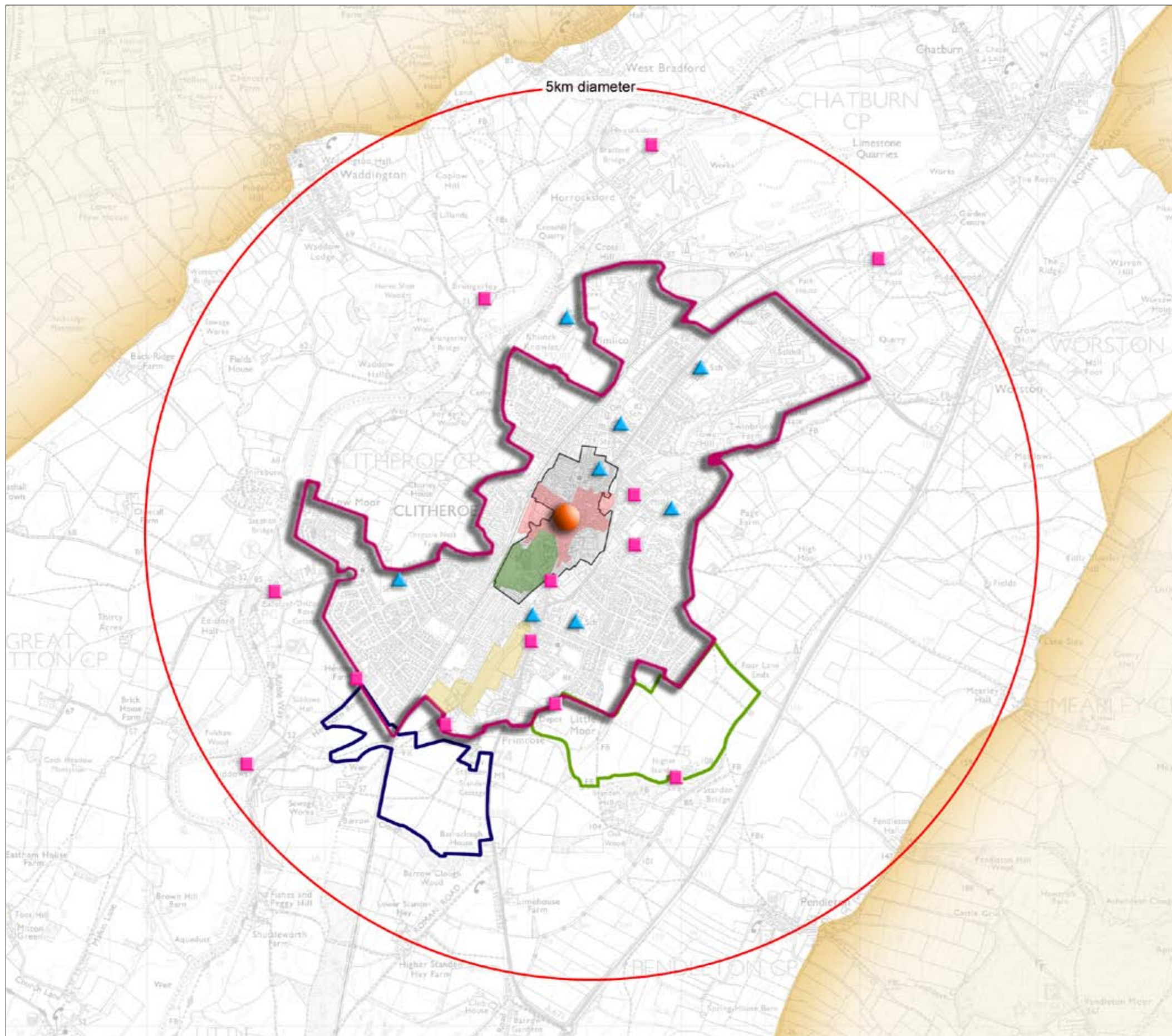












- Key**
- Settlement Boundary
 - Major A Roads
 - Minor B Roads
 - AONB
 - Known Planning Permissions
 - Potential Planning Permissions
 - Standen Site
 - Henthorne Site
 - Pedestrian Routes
 - Trainline



Figure 2
Connectivity

South Clitheroe Sustainable
Urban Extension - Masterplan



- Key**
- Settlement Boundary 
 - AONB 
 - Standen Site 
 - Henthorne Site 
 - Schools 
 - Conservation Area 
 - Listed Buildings outside conservation area 
 - Parks and Gardens 
 - Retail Area 
 - Primrose Area Policy 

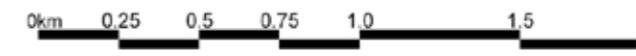
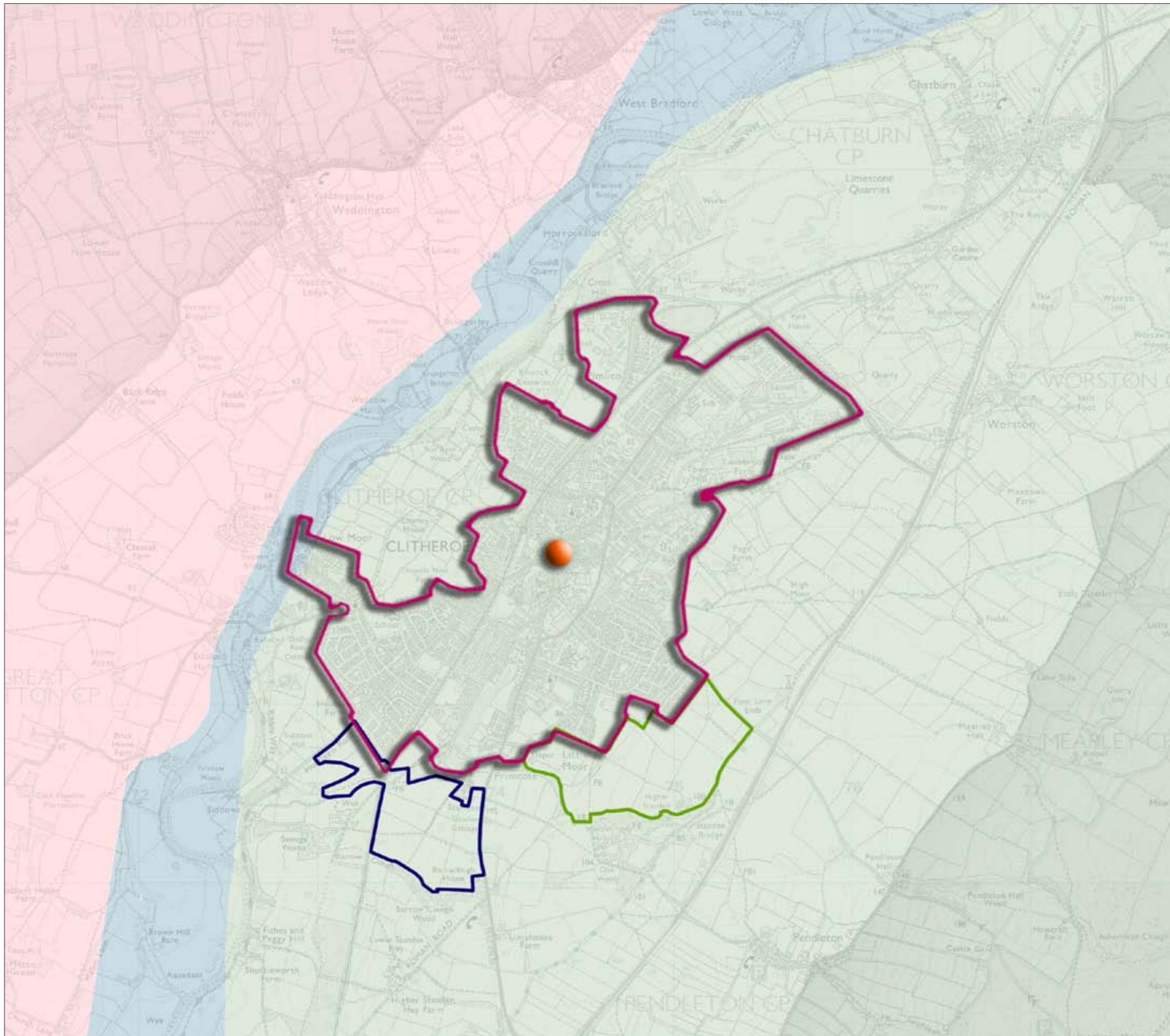


Figure 3
Buildings of Importance

South Clitheroe Sustainable
Urban Extension - Masterplan










- Key**
- Settlement Boundary 
 - Standen Site 
 - Henthorne Site 
 - Undulating Low Land and Farm Land: Lower Hodder and Loud Valley (5b) 
 - Valley Floodplains: Lower Ribble Valley (11a) 
 - Undulating Low Land and Farm Land: Lower Ribblesdale (5e) 
 - AONB 



Figure 4
Landscape Strategy for Lancashire

South Clitheroe Sustainable Urban Extension - Masterplan

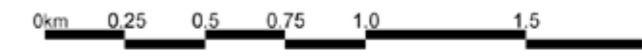
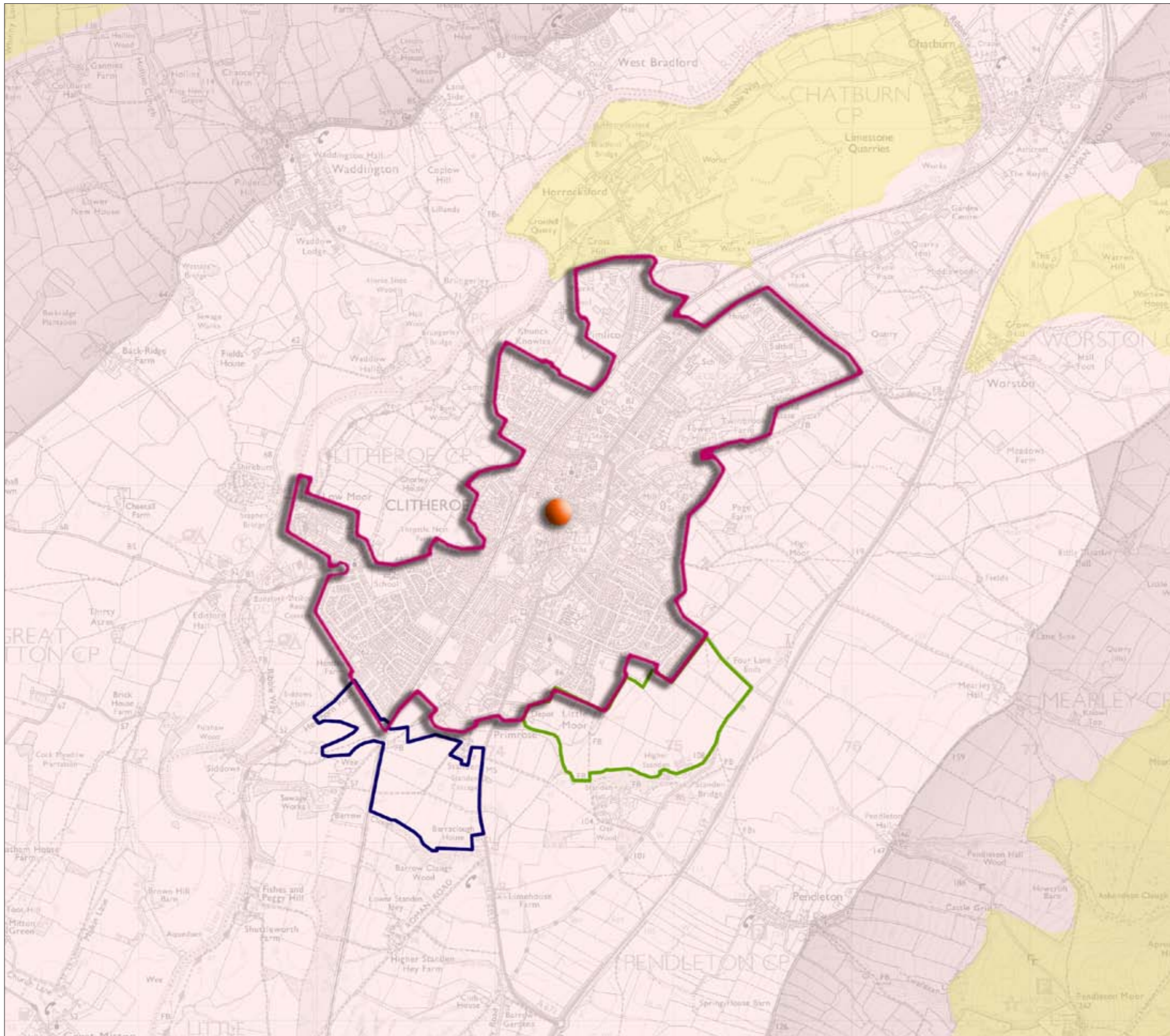
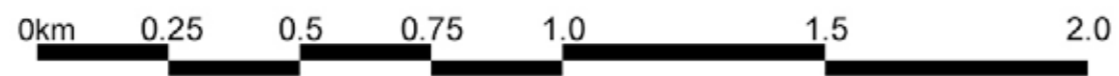
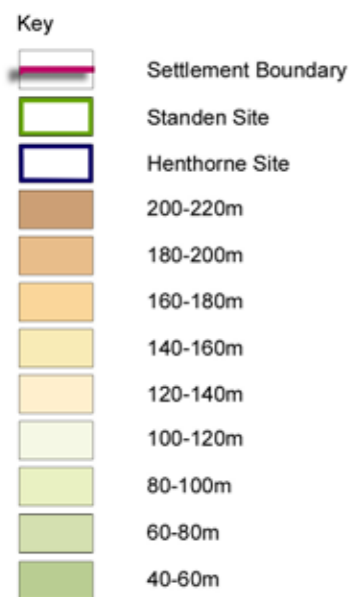
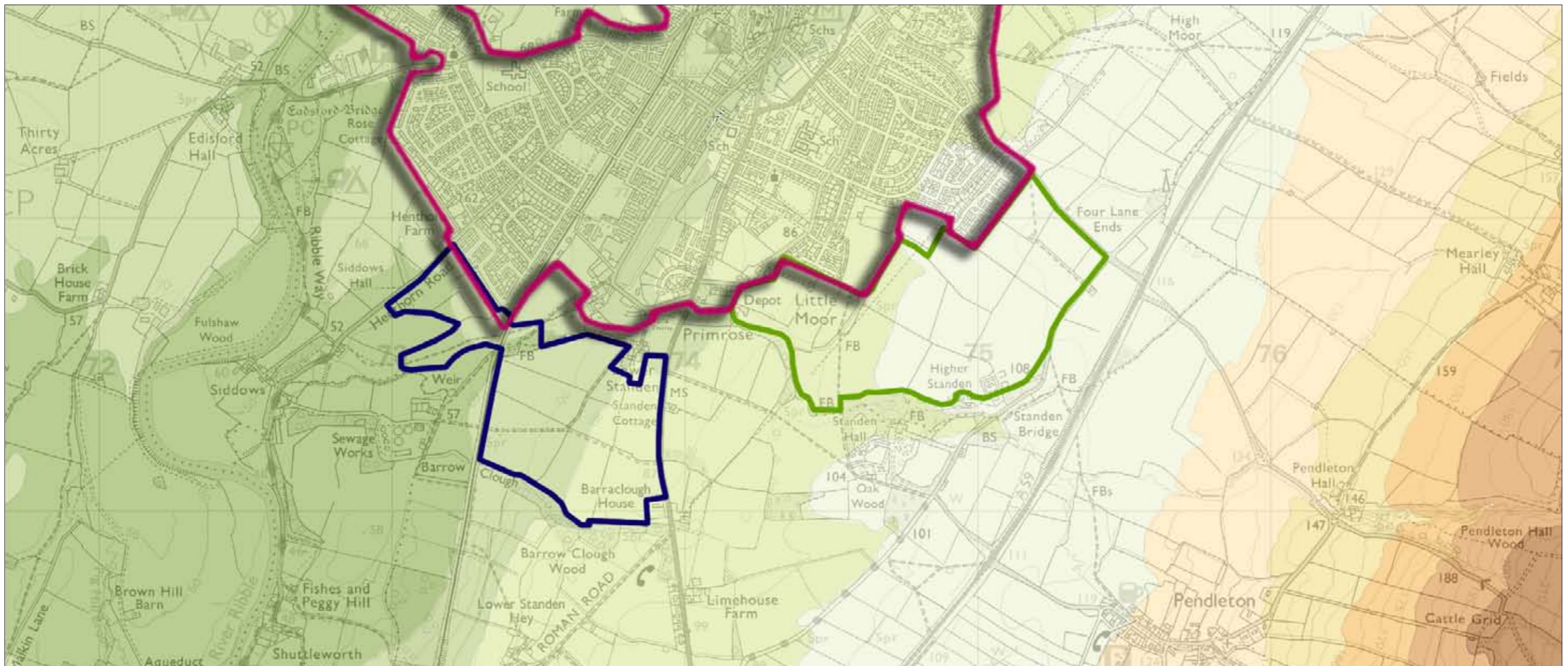


Figure 5
Ribble Valley Landscape Types

South Clitheroe Sustainable
Urban Extension - Masterplan



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Figure 6
Topographical Drawing

South Clitheroe Sustainable
Urban Extension - Masterplan



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Figure 7
Opportunities and Constraints

South Clitheroe Sustainable
Urban Extension - Masterplan



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Figure 8
Receptors

South Clitheroe Sustainable
Urban Extension - Masterplan



- Key
-  Site boundary
 -  Sites with planning permission for residential development
 -  Standen site
 -  Proposed link road
 -  Indicative estate roads
 -  Existing public footpaths
 -  Proposed footpath cyclepath link
 -  Proposed public open space (8.9 hectares)
 -  Existing trees and hedgerows
 -  Proposed avenue trees
 -  Landscape Buffer Zone
 -  Proposed play area: large and small
 -  Proposed indicative residential development (18.9 hectares)
 -  Proposed employment zone (1.3 hectares)
 -  Proposed School (2.25 hectares)
 -  Proposed retail, service and community users (0.5 hectares)
 -  Proposed retirement living (0.85 hectares)



Figure 9
Masterplan

South Clitheroe Sustainable
Urban Extension - Masterplan



STANDEN SITE VIEWS OUT TO AONB



STANDEN SITE



STANDEN COTTAGE AND VIEWS FROM REAR OF PROPERTIES



WHALLEY ROAD CORRIDOR



VIEWS OUT TOWARDS AONB FROM RIVER CORRIDOR



HENTHORN ROAD - LINK ROAD LOCATION PANORAMIC



HENTHORN ROAD APPLICATION SITE



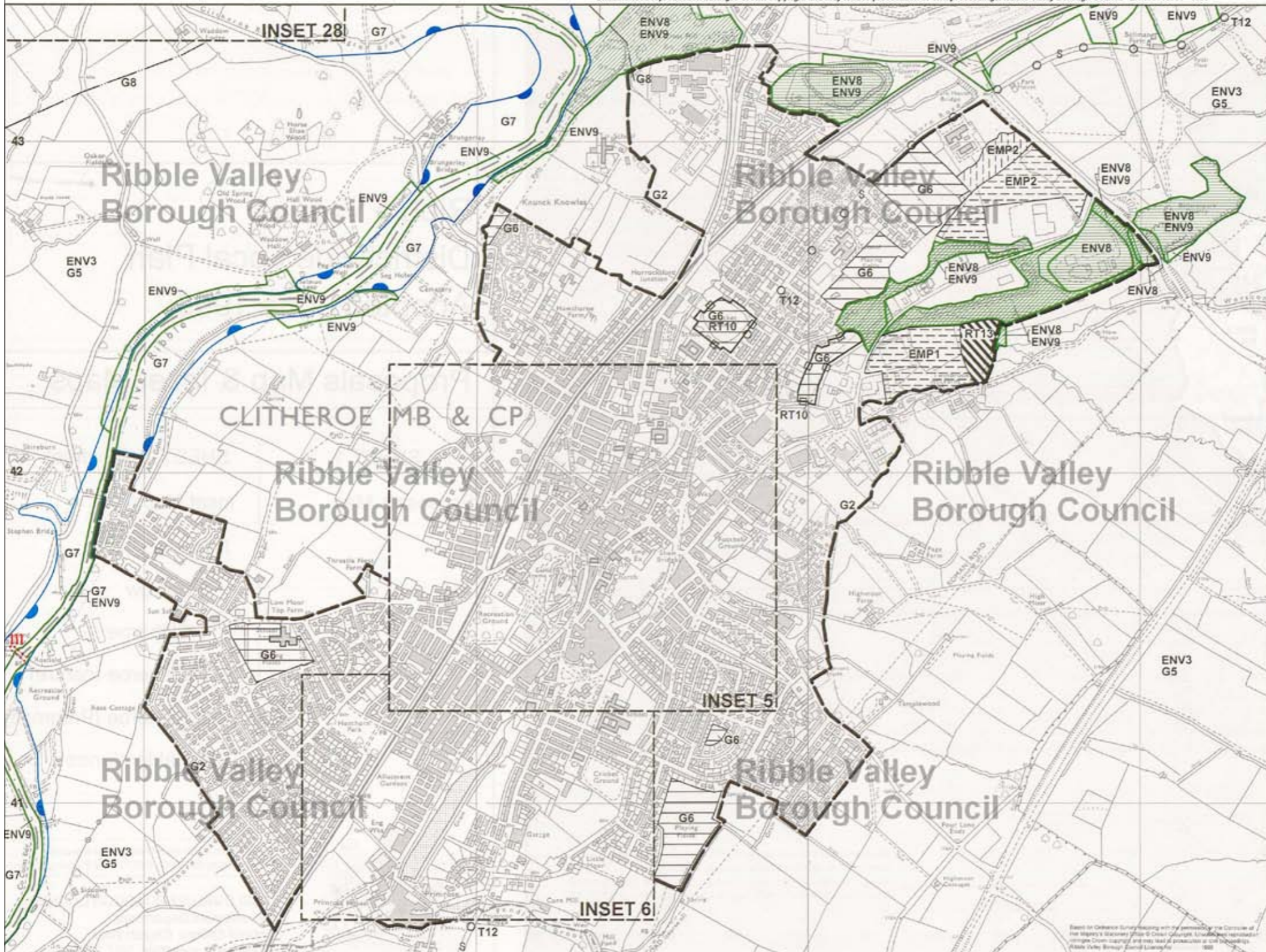
VIEW TOWARDS SITE FROM AONB ZOOMED PANORAMIC



VIEW TOWARDS CLITHEROE FROM AONB - NO ZOOM

Inset 4. Clitheroe 1:10,000

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SHEET 2

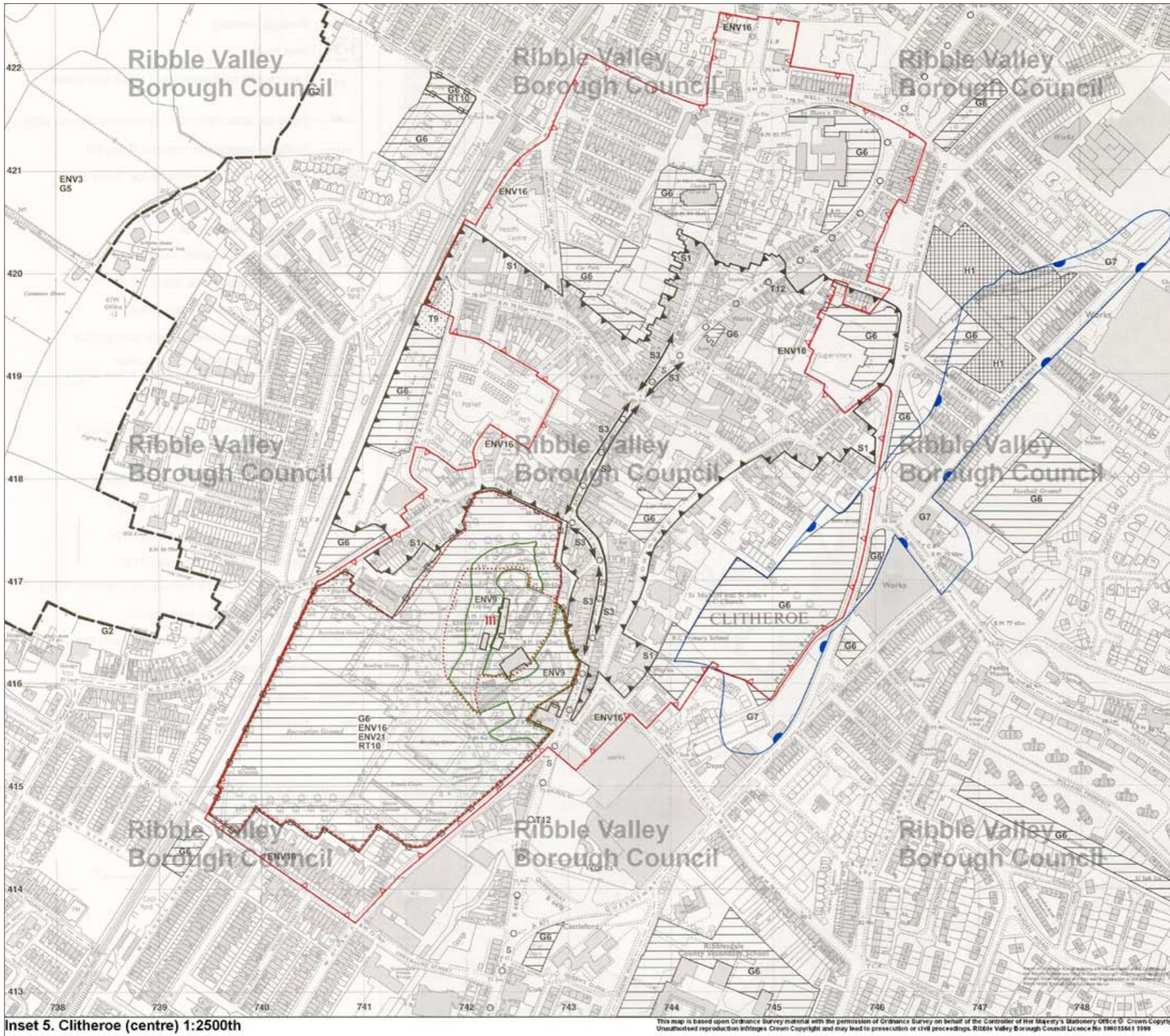
Ribble Valley
Districtwide Local Plan
Adopted June 1998

- Inset map
 - - - Main settlement boundary. Policy G2
 - Village boundary. Policy G4
 - os Land outside main settlement / village boundaries. Policy G5
 - Essential open space. Policy G6
 - Flood risk area. Policy G7
 - Notifiable installations / pipeline. Policy G8
 - env3 Open countryside. Policy ENV3
 - Sites of special scientific interest. Policy ENV8
 - Local nature reserve. Policy ENV8
 - County biological heritage sites. Policy ENV9
 - Ancient woodland. Policy ENV12
 - Scheduled ancient monument. Policy ENV14
 - Conservation area. Policy ENV16
 - Historic parks and gardens. Policy ENV21
 - Housing land allocation. Policy H1
 - Industrial land allocation. Policies EMP1; EMP2
 - Industrial land allocation. B1 use only. Policy EMP2
 - Public open space in recreational use. Policy RT10
 - Golf driving range. Policy RT13
 - Proposed bus terminus. Policy T9
 - Lancashire cycleway (N) north (S) south. Policy T12
 - Main shopping centre. Policy S1
 - Principal shopping frontage. Policy S3
 - Primrose area policy. Policy A1
 - Calderstones area policy. Policy A3
 - Central built campus (Calderstones). Policy A3
- Note: Inset 6. Clitheroe (Primrose)
- Potential employment area (subject to constraints)
 - Potential residential area - see policy wording

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Clitheroe Inset 4

South Clitheroe Sustainable
Urban Extension - Masterplan



Inset 5. Clitheroe (centre) 1:2500th

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SHEET 2 Ribblesdale Districtwide Local Plan Adopted June 1998

- Inset map
 - - - Main settlement boundary. Policy G2
 - Village boundary. Policy G4
 - o Land outside main settlement / village boundaries. Policy G5
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 - Primrose area policy. Policy A1
 - Calderstones area policy. Policy A3
 - Central built campus (Calderstones). Policy A3
- Note: Inset 5. Clitheroe (Primrose)
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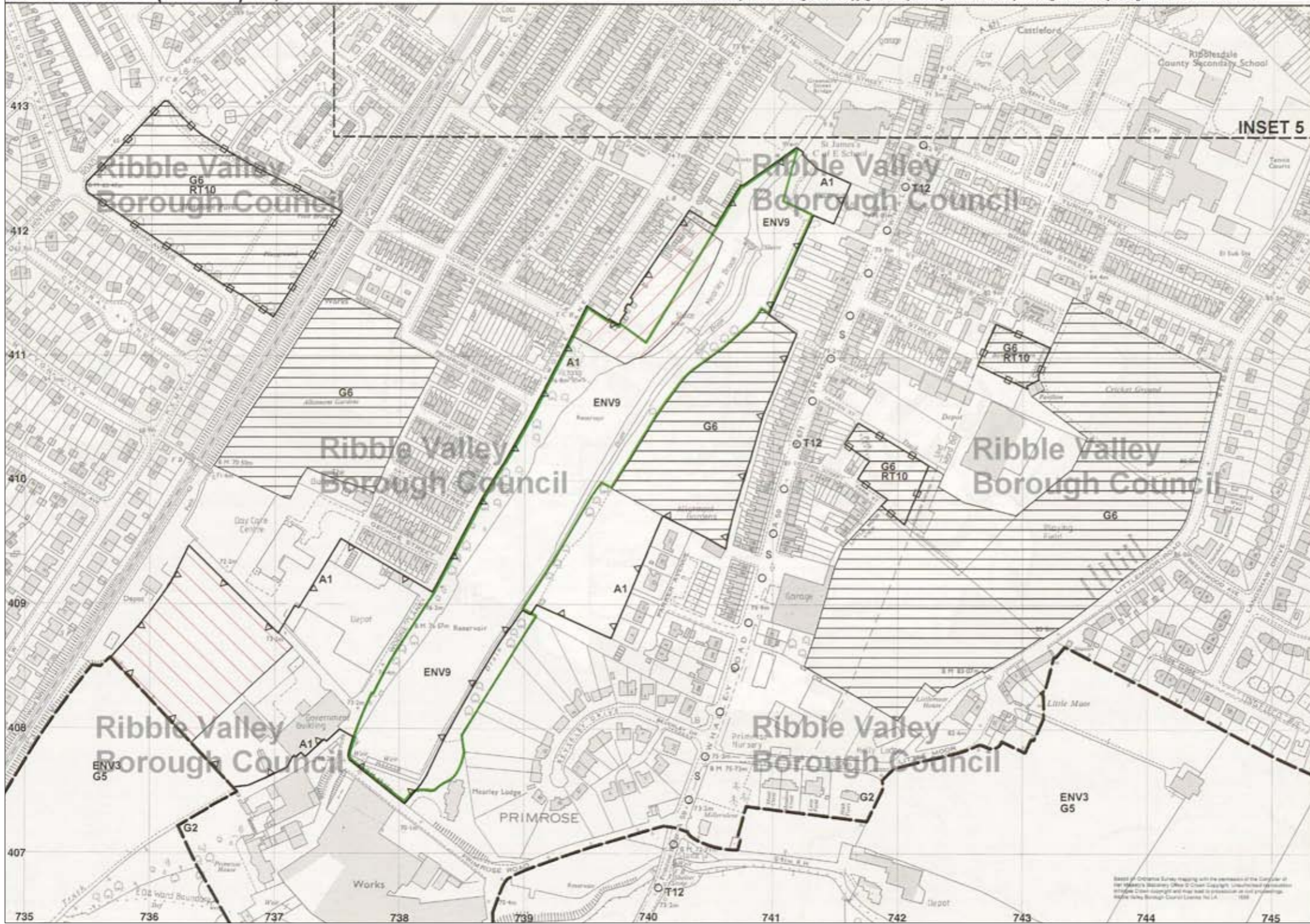
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Clitheroe Inset 5

South Clitheroe Sustainable Urban Extension - Masterplan

Inset 6. Clitheroe (Primrose) 1:2,500

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SHEET 2

Ribble Valley
Districtwide Local Plan
Adopted June 1998

- Inset map
 - Main settlement boundary. Policy G2
 - Village boundary. Policy G4
 - G5 Land outside main settlement / village boundaries. Policy G5
 - Essential open space. Policy G6
 - Flood risk area. Policy G7
 - Notifiable installations / pipeline. Policy G8
 - ENV3 Open countryside. Policy ENV3
 - Sites of special scientific interest. Policy ENV8
 - Local nature reserve. Policy ENV8
 - County biological heritage sites. Policy ENV9
 - Ancient woodland. Policy ENV12
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Clitheroe Inset 6

South Clitheroe Sustainable
Urban Extension - Masterplan