

Ribble Valley Core Strategy

Submission by Save Whalley Village for the Examination in Public

Mike Harper, December 2013

Summary

Save Whalley Village believe that the Core Strategy as submitted is not sound in four areas. Firstly it works against the strategic priorities of the wider area: specifically regeneration of nearby declining towns - towns which are inherently more sustainable as areas for development. Secondly the way in which housing is distributed between the borough's settlements is inequitable and unjustified. Thirdly the basis for arguing an increase in the minimum housing total for the borough from 4,000 to 5,000 is weak; the switch to an employment driven target rather than a demographic driven one is unjustified in the context of 2011 Census data. Fourthly the Infrastructure Plan has not been positively prepared: it is rather a statement of assets and service levels than a plan for future provision.

Introduction

Save Whalley Village and many of its 1400 members have engaged with the Core Strategy process from the start. While we are pleased that at long last that process is reaching its conclusion, we are concerned about four areas of the Strategy – areas which we argue makes the plan unsound as currently written. These areas are:

- The duty to co-operate and wider strategic priorities (Matter 2)
- The development strategy and settlement hierarchy (Matter 2)
- The minimum housing requirement for the borough (Matter 3)
- The infrastructure plan (Matter 9)

In light of the guidance provided by Mr Berkeley on the examination process we include in this report an explanation of why we believe the plan is unsound, and specific changes we feel are necessary to correct the plan. In doing so we draw on our previous submissions to the various public consultations.

Housing totals

On the strength of two reports produced by Nathaniel Lichfield and Partners (NLP), RVBC have increased the minimum housing total from the 3200 in the now defunct Regional Spatial Strategy to 5000. This is in just two years.

In our most recent response to the Core Strategy¹ we argued that their proposal to increase the minimum housing requirement from 4,000 to 5,000 was unjustified. In fact the 2011 Census data and ONS projections show significantly *reduced* levels of household formation. NLP have failed to adequately explain or justify this divergence. What is more the new requirement comes from an

employment-led scenario. It is based on modelling whose purpose is to predict employment land needs rather than demographic change; this modelling is not described in sufficient detail.

The rapid increase in housing need is unlikely to be real given less than two years has elapsed. It suggests the methodology for these assessments is neither robust nor objective. Far stronger justification would be needed to substantiate the increase to 5,000 that has been suggested by NLP.

Therefore we believe the revised figure of 5,000 houses should be dropped and the housing requirement be kept at 4,000.

Strategic priorities

Urban areas in nearby Pendle, Burnley, Blackburn and Hyndburn are sustainable locations for growth. They do however suffer from deprivation, low investment and poor quality housing. The need to regenerate these areas is probably the prime strategic priority across East Lancashire.

The Pennine Lancashire Housing Strategyⁱⁱ considers this sub-regional strategy (including the Ribble Valley). It describes the migration to the Ribble Valley of the more affluent residents of urban centres across the region, to the latter's detriment. It identifies as "vital" the need for the rest of Pennine Lancashire to attract more of this in-migration.

However this is at odds with the Ribble Valley's Core Strategy. Greatly boosting supply of 'aspirational' homes in the Ribble Valley must undermine attempts by neighbouring authorities to compete for in-migration, notwithstanding any benefit in increasing affordability in the Ribble Valley. Nowhere is this basic misalignment between the sub-regional strategy and Local Plan resolved or even commented on.

Neither the original 2011 NLP forecast of housing requirement, nor its recent revision, make any reference to this strategic priority, and this is another reason why we believe their conclusions are unjustified.

We believe this supports our contention that the overall housing requirement for the borough should not be increased to 5,000.

Development strategy

The Core Strategy is predicated on a split in the bulk of the housing between the three "Key Service Centres" (KSCs), of which Whalley is one. Whalley is the smallest KSC in Lancashire by some way (their median population in 2001 was over 10,000)ⁱⁱⁱ. In light of this we have several concerns over RVBC's approach.

The "checkbox" methodology used to assess whether a settlement is a KSC is crude. It cannot distinguish between scales of settlement that are clearly relevant when determining sustainable locations for housing. For example if one were to include Blackburn, Manchester and London in this analysis, they would score the same as Clitheroe (42 points) and only four more points than Whalley.

Yet according to the recent RVBC Service Centre Health Check report (Aug 2013; Table 1), Clitheroe has a total of 189 "Service Centre Outlets". Longridge has 95 and Whalley has 45. Whalley has one

bank or building society compared to Clitheroe's eleven. It has no supermarkets compared to Clitheroe's eight. This discrepancy is not reflected in the Settlement Hierarchy which considers neither in its scoring scheme.

This is compounded by very different approach taken to housing targets between KSCs and other settlements. Whalley with a score of 38 is allocated 463 houses; Mellor and Langho with scores of around 30 are allocated 45 each. Aside from the overall housing requirement discussed above, it is the perceived inequity of this distribution that has undermined for Whalley residents confidence in the plan-making process.

We understand that development should preferentially be sited in more sustainable locations, and we accept that Whalley is one of the more sustainable locations in the borough. However we suggest the proposed distribution is not justified. We believe the Core Strategy should for these purposes not arbitrarily impose a classification, but should instead recognise settlements have a continuum of service provision.

Specifically this could be achieved by allocating for each settlement, i , a number of houses proportional to both its population P_i and the settlement hierarchy score, S_i :

$$N_i \propto P_i S_i$$

The calculation is straightforward and automatically reflects both sustainability and size of settlement in a proportionate way.

In addition we believe that the sustainability score should be modified to incorporate (a) levels of provision (i.e. not just whether a service is present or not); and (b) key services not currently included such a supermarkets.

Infrastructure

The Infrastructure Plan, dated April 2012, is likely to be ineffective, and has not been positively prepared.

It is not a "plan" in the usual sense of the word. It is a statement of current assets and service levels, together with a listing of what improvements are already scheduled (though not it appears committed to). There are some vague assurances about processes that should be followed should a need arise, for example:

"When developing the Local Development Framework (LDF) and future policies the LPA should consider the impacts on the health and well-being its community, environment and ensure infrastructure capacity is available. If infrastructure deficiencies cannot be addressed, an alternative location and/or timescale should be sought where infrastructure capacity is available and it meets the LPA's development needs."(Infrastructure Plan, p.29)

While a statement of the current position and possible scheduled improvements are necessary, they are surely not sufficient.

We cannot find in this Plan a single specific infrastructure improvement that has been identified as being needed to support the proposed level of development in the borough. There are no costings,

no timetable, and no matching of needs to funding sources. It also appears that what analysis is present contains significant errors.

Three examples are particularly relevant to Whalley.

Firstly education. We argued in our 2012 responseⁱⁱⁱ to the Core Strategy (the Infrastructure Plan has not been updated since) that the information on primary schools places with regard to Whalley was incorrect and the projections based upon it questionable. Moreover given updates to the housing requirements and additional developments already approved, the shortfall in school places is likely to be even greater.

With regard to secondary education, the Plan does clearly indicate (with a shortfall of 1,000 places) the need for another school in the Clitheroe area. There is however no mention of this in the text, no identification of possible sites, and no timescales for its delivery.

Secondly traffic. Traffic Assessments for recent planning applications (e.g. Lawsonsteads^{iv}) have shown that significant traffic congestion occurs at the two roundabouts in Whalley. This is not just our opinion: the Strategic Highways Planning Manager at LCC agrees with us there is a need to improve traffic flows and alleviate congestion in the village, especially given the several hundred additional houses that have been granted planning consent.

Yet neither this need nor any approach to tackle it appears anywhere in the Infrastructure Plan. We have been obliged to take the matter up directly with LCC, who have designed a scheme to be funded by developer contributions. If we had not taken this initiative then a very real need would have gone unmet and even unidentified by Plan.

Finally sewage treatment. United Utilities have indicated in their response to several previous planning applications (e.g. Utilities Assessment for Mitton Rd^v) that the Whalley Wastewater Treatment Works are at or approaching capacity. This is not mentioned in the Infrastructure Plan, despite the Works serving a much wider catchment than just Whalley. Again the Plan contains only the vaguest indication of how such matters might be addressed: in fact the quote above is from United Utilities, but is sufficiently vague that it could refer to any kind of infrastructure.

What are the deficiencies, and over what catchment might these be felt? Would the current Works be extended or a new one constructed elsewhere? Are sites available? None of these questions are answered by the Plan.

As a minimum therefore we believe the Infrastructure Plan should be extended to address the above three items.

References

ⁱ Consultation response to RVBC Core Strategy. SWV, September 2013

ⁱⁱ http://www.ribblevalley.gov.uk/download/8337/pennine_lancashire_housing_strategy_refresh_2011

ⁱⁱⁱ Consultation response to RVBC Core Strategy. SWV, June 2012

^{iv} <http://www.ribblevalley.gov.uk/planningApplication/23800>

^v http://www.ribblevalley.gov.uk/planx_downloads/12_0637_Utilities_Assessment.pdf, page 3