

adid 8/9/14



Date: 5 September 2014

The forward Planning Team,
Ribble Valley Borough Council,
Council Offices,
Church Walk,
Clitheroe,
Lancashire
BB7 2RA

Dear Sirs,

**Ribble Valley Borough Council Core Strategy Further Consultation on Main Modifications
Land to the rear of Beech Cottage, Copster Green**

We act on behalf of Calderwood Developments (LTD) and we welcome the opportunity to make representations to the Ribble Valley Council Core Strategy Further Consultation on Main Modifications.

Housing Targets

Policy H1 of the Core Strategy identifies the number of dwellings required within the Borough across the Plan Period (2008-2028.MM12 increases this figure from 4,000 to 5,600. This increase is in line with the previous recommendations of the inspector:

'In the case of this Core Strategy, I agree that housing and economic growth should 'dovetail'. For this to genuinely occur, from the Update's objective assessment, an annual average of 280 dwellings per annum is necessary.'

However, it is noted that the Inspector highlights that 280 per annum is the minimum housing target required in order for the economic aspirations within the core strategy to be achieved. A higher figure would be required if RVBC were to fully comply with paragraph 47 of the NPPF and boost significantly the supply of housing. This is even more pertinent when the historic under supply of RVBC is considered, as the housing target for the Borough has not been met in over five years. If this were to continue with a figure of 280 RVBC would not be meeting their economic aspirations. A higher housing target would provide greater certainty with regard to achieving economic growth in the Ribble Valley.

Delivery within the Ribble Valley is not meeting the affordable housing target of 30% of all development. This is clearly stated within the Housing Land Supply Report 2013 produced by RBVC which shows that on the assumption that the current Five Year Supply is delivered the affordable housing delivery rate would equate to 24% of all housing in the Borough. This is a considerable shortage considering the affordable housing need discussed within the RVBC Housing Need Survey 2013 is for 404 dwellings per annum. The NPPG clearly states that where this is the case the Local Authority should look to increase housing market provision to ensure that the affordable housing need within an area is achieved. The current housing

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targets and delivery therefore do not conform to paragraph 50 of the NPPF in delivering the required affordable housing need.

It is therefore stated that in order for RVBC to produce a plan which promotes sustainable development to meet the objectively assessed needs of the current and future population within the Ribble Valley and therefore be considered compliant with the NPPF; the number would need to be increased further to between 300 – 320 units per annum.

Settlement Hierarchy and Spatial Distribution of Housing

The Inspector requested that the council re-categorise the sustainable villages and provide a clear strategy for the distribution of housing within these settlements. We do not object to the principle of categorisation and can see that there is a need for varied levels of development within the settlements. We do however, object to the removal of any housing requirement within 23 of the 32 sustainable villages. The inspector states that:

'This should include a more refined differentiation between the villages in the second tier on the basis of their sustainability, capacity to accept growth and any other pertinent factors. It should also identify the level of new housing anticipated in a more finely grained manner. Allocating specific figures to each of the individual villages would be the ideal situation. However, it might be that you can conceive of other justifiable and effective solutions. Much may depend on the modified hierarchy and how you propose to single out or group the villages. Given this, for the time being at least, I keep an open mind about the precise level of detail needed.'

The inspector does not question the previous sustainable nature of the settlements, just outlines that a hierarchy may be required. This hierarchy does not remove the need for housing within settlements, just requests that the council sets sustainable and justified targets for the delivery of housing in each settlement.

The Council's distribution of housing across only nine settlements does not address the comments made by the Inspector, or the needs of the area. In continuing along this approach RVBC would not be complying with paragraph 55 of the Framework as the settlement hierarchy has not placed any emphasis on the importance that development within one village aids services in surrounding villages. This equally does not allow for these smaller villages to expand naturally in line with their growing populations and therefore does not maintain the vitality of these rural communities. The lack of consideration provided to maintaining the amenities and facilities within the smaller rural settlements is in contradiction to paragraph 28 of the NPPF and the aim to promote the retention and development of local services and community facilities.

The delivery of the full housing need for all 32 of the sustainable villages to be placed solely within nine of the villages means that the level of development within the nine villages is disproportionate and potentially harmful to the social and cultural structure of these settlements. It is therefore argued that this strategy does not conform to paragraph 54 of the NPPF and does not reflect the local needs or circumstances across rural RVBC.

Conclusion

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The Inspector's suggested Main Modifications aim to provide further clarity and increase the sustainability credentials of the Core Strategy. However, it is clear that the approach of RVBC to applying these modifications has not fully considered and addressed the Inspector's comments and it is therefore suggested that further changes are made:

- Increasing the housing target within the area further in order to truly reflect the under supply, affordable housing need and the economic growth strategy set out within the core strategy. Supplying the minimum housing figure does not promote sustainable development and could result in the failure of other key policies within the Core Strategy.
- Alterations to the hierarchy of sustainable villages and housing distribution to fully consider even smaller settlements growth requirements within a 20 year period in order for them to remain vibrant rural locations in which people can choose to reside and businesses can flourish.

We wish to advance these representations in the context of current consultation and we hereby do so.

Yours Faithfully,

A heavily scribbled-out signature, likely of the Town Planner, in black ink.

A redacted name in black ink, followed by the text:
Town Planner,
WYG

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