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THE HOME BUILDERS FEDERATION

CORE STRATEGY CONSULTATION

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Date: 4th July 14

Dear Sir / Madam

Ribble Valley BC Core Strategy: Proposed Main Modifications

Thank you for consulting with the Home Builders Federation (HBF) on the Core Strategy: Proposed Main Modifications.

The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.

We would like to submit the following representations on the proposed main modifications document.

The HBF would also like to attend any further hearing sessions to debate these matters further.

Main Modifications MM9 (Key Statement EN3), MM33 (Key Statement EN3) and MM39 (Policy DMG1)

The proposed amendments to Key Statement EN3 and Policy DMG1 are considered unsound. They are not considered positively prepared, justified by the evidence or in conformity with national policy.

The modifications to Key Statement EN3 identifies that *'The Council will assess applications against the current code for sustainable homes, lifetime homes and building for life and BREEAM standards, or any subsequent nationally recognised equivalent standards'*. Likewise Policy DMG1 as amended indicates that *'The Code for Suitable Homes and Lifetime Homes, or any subsequent nationally recognised equivalent standards, should be incorporated into schemes'*.

The Council will be of the ministerial statement by Stephen Williams MP on 13th March 2014 which clearly identifies the government's desire to reduce local standards. With regards to the Code for Sustainable Homes the statement clarified that;

'... many of the requirements of the Code for Sustainable Homes will be consolidated into Building Regulations, which would require substantial changes to the content of the current Code, as well as a reconsideration of its role. In the light of this, the Government thinks that the current Code will need to be wound down to coincide with the changes incorporating the new standards coming into force'.

In terms of the energy components of the code, Government has clearly stated that there should be a "Building Regulations only" approach with no optional local standards above the requirements of Part L.

Given the government's push to reduce local standards, the commitment for a zero carbon standard (with the inherent costs) and the fact that the government intends to 'wind down' the Code it is recommended that all references to the Code for Sustainable Homes be removed from the plan.

With regards Lifetime Homes, Government have indicated that there will be an optional accessibility standard which equate to an amended version of Lifetime Homes. Whilst the details of the accessibility standards are still being considered it is clear that to implement such optional standards the Council must clearly justify their inclusion. The HBF is unaware of any evidence provided by the Council to justify the inclusion of a higher standard.

The HBF is generally supportive of providing appropriate accommodation for older persons and other groups and many house builders already provide properties which accord with the Lifetime Homes standard. However the cost of the provision of Lifetime Homes has not been fully factored into the 'Core Strategy Viability Study 2013'. This is clearly contrary to paragraphs 173 to 177 of the NPPF which require the cumulative impacts of all plan policies and obligations to be taken into account. Whilst the viability study (paragraph 7.11) does identify a cost of £1,000 per unit for Lifetime Homes which roughly equates to the mid-point of the costs identified on the Lifetime Homes website (£545 to £1615 per dwelling) it does not take account of other factors associated with Lifetime Homes which will impact upon development viability. These additional costs are associated with the fact that Lifetime Homes generally require a larger footprint but do not provide additional revenue. This impacts upon overall site viability as revenues per unit do not increase but the number or size of none Lifetime Homes dwellings is reduced.

It is recommended that given the Governments approach to accessibility, the lack of evidence justifying a higher standard or the full costs associated with implementing Lifetime Homes the relevant Key Statements, Policies and Supporting Text in the plan be amended. The HBF recommends that the Council seek to **encourage rather than require** such provision.

Main Modification MM12 (Key Statement H1: Housing Provision) and MM13 (paragraph 6.4)

The HBF is generally supportive of the increase in the housing requirement. The proposed modification is, however, considered unsound as it is not sufficiently aspirational and therefore will not boost significantly the supply of housing required by the NPPF.

Whilst the increased housing requirement from 250 dwellings per annum (dpa), included in the proposed changes document, to 280dpa is welcomed it is not considered sufficient to meet the full objectively assessed needs for both market and affordable housing as required by the NPPF (paragraph 47). The HBF previously discussed (proposed changes document representations) the need for a requirement in excess of 300dpa. The reasoning for this is summarised below.

The 2011 background paper on defining a housing requirement and subsequent update in 2013, which takes account of the 2011 based household projections, identifies a wide range of potential growth scenarios for Ribble Valley. Whilst all of the scenarios modelled provide useful hypothetical case studies many cannot be realistically controlled by the Council and therefore should be discounted. The Council's vision is clear that it wants to increase jobs and meet the needs, including housing, of the area.

If the Council intends to achieve its vision and provide for its full objectively assessed needs it should consider a scenario which achieves these aims. The National Planning Practice Guidance (NPPG) clearly identifies that whilst the CLG household projections are the starting point for identifying an objectively assessed housing need, employment aspirations and market signals also need to be taken into account. Therefore the jobs growth scenarios provided by the Council provide an appropriate mechanism to assess the objectively assessed housing needs of the area. The jobs growth scenarios indicate a need for between 280 and 559 net new dwellings per annum. The 280 figure, which the Council is now using to base its housing requirement, is based upon the most recent economic forecasts which are borne through a period of recession. It is therefore plausible to conclude that this figure represents an absolute minimum housing requirement as it is likely to perpetuate current recessionary trends. Indeed the Inspector notes in his letter to the Council (31st January 2014) that; *'a main modification increasing the level of housing growth to an annual average of at least 280 (our emphasis) is necessary for soundness'*. The HBF contends that only meeting this absolute minimum is neither positive nor aspirational. If the Council truly wish to aspire to job growth and seek to positively plan for such growth a figure in excess of 300dpa would appear more appropriate.

The NPPF is very clear that Local Plans need to plan to meet their objectively assessed need for housing (paragraphs 14, 17, 47, 159 and 182). Paragraph 47 of the NPPF further clarifies in terms of housing plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area. The NPPF (paragraph 159) states that the SHMA should be used

to determine *'the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period'*.

The SHMA, published in July 2013, identifies a net need for 404 affordable properties per annum. Section 5 of the document considers other sources of supply, including subsidised private rent, and indicates a revised net need figure of 114 dwellings per annum. It then goes on to identify in Section 6 that a split of 70% market and 30% affordable (comprising 6% shared ownership, 19% Affordable Rent and 5% new social rented dwellings) should be adopted.

Given that the Council's policy is for this to be provided by market housing at a rate of 30% (as required by Key Statement H3) this would provide an annual requirement in excess of 342 per annum. In reality the figure would need to be greater than this as not all sites would be able to provide affordable housing at the rate suggested. This figure more closely aligns with the job growth scenarios E (559), Ea (434), F (398) and Fa (315).

The proposed modification also removes the words **at least** from the Key Statement and paragraph 6.4. This is considered to be a negative amendment which removes flexibility for increased levels of house building. It is therefore considered contrary to the aim of the NPPF to significantly boost housing supply and the Inspectors letter to the Council dated 31st January 2014.

In addition, whilst not a main modification, it is noted that paragraph 6.4 still retains its reference to the phasing of sites. This should be removed as it will unnecessarily and artificially constrain the delivery of housing without due cause. The Council should seek to maximise its housing provision by the removal of such phasing, this will result in a greater possibility of the Council achieving its five year supply. The Council has not provided any justification for a phased approach to site release. The Inspector of the Rotherham Core Strategy did in his preliminary findings recommend the removal of a phasing policy as it was not considered to accord with the Framework (Inspectors Preliminary Findings, paragraph 5). The HBF therefore recommends that any phasing is indicative only.

Recommendation

It is recommended that the Council increase its housing requirement so that it is in excess of 300 dwellings per annum. This will enable the Council to meet the full identified needs for both market and affordable housing.

It is also recommended that the words **at least** are re-instated into the policy to provide a more positive plan with greater flexibility and to accord with the aforementioned requirements of the NPPF. The Key Statement should therefore be amended to read (notwithstanding our comments upon the overall housing requirement);

'Land for residential development will be made available to deliver at least 5,600 dwellings, estimated at an average annual completion rate of at least 280 dwellings per year over the period 2008 to 2028...'

Main Modification MM47 (Policy DMG1)

The proposed changes to the policy are considered unsound as they are not positively prepared or consistent with national policy.

The proposed amendments to Policy DMG1 incorporates a new sentence which identifies that '*Previously developed sites should always be used instead of greenfield sites where possible*', this indicates prioritisation of brownfield sites. Such an approach is contrary to NPPF paragraph 111 which states that planning policies and decisions should encourage the effective re-use of previously developed land. It does not prioritise such use. The NPPG (ID 10-025-20140306) identifies that such encouragement should come from reducing the burdens placed upon sites through planning obligations and negotiation with land owners, it does not advocate a sequential approach to the development of such land as inferred by Policy DMG1.

Recommendation

It is recommended that the sentence be redrafted to read; '*The development of previously developed sites will be actively encouraged by the Council*'. The Council may wish to consider ways it can encourage the re-use of such sites through reducing burdens on such sites and liaising with land owners and developers.

Main Modifications MM50 (Policy H3) and MM51 (paragraphs 6.7 and 6.8)

The proposed amendments are considered unsound, as they are not positively prepared or justified by the evidence.

Main Modification MM50 does provide additional clarity to the policy requirements identified within Policy H3, the HBF is however concerned that the Council is seeking in Main Modification MM51 to ensure that all homes for older people comply with Lifetime Homes standards as a minimum. As noted in our comments upon Main Modifications MM9, MM33 and MM39 above our main concerns relate to the full costs of providing such accommodation not being fully assessed and the push by central government to reduce local standards, for brevity these arguments are not repeated here.

Information

I would be pleased to be kept informed of the examination process. I am happy to discuss the comments made within this representation with the Council.

Yours sincerely,



Ribble Valley Borough Council; Core Strategy
Publication of Proposed Main Modifications to Submitted Core Strategy
Representations Submitted by Janet Dixon Town Planners Ltd

Introduction

These representations are made further to the Council's consultation, which commenced in late May 2014 and closes on Monday 7 July 2014. The representations relate solely to the proposed main modifications, the Sustainability Appraisal (SA) Addendum and the additional published papers.

Core Strategy - Tracked changes version (post 5.14)

One of the 'additional published papers' is titled as above. It should be an essential document to all those seeking to understand the context and, thus, effect of the proposed main modifications. It seemingly purports to be an 'update' of the submitted Core Strategy (and previous modifications), thereby showing all of the currently proposed main modifications by blue highlight.

Unfortunately, the document available for consultation on the internet (listed as Item 3) patently fails to do what one can reasonably assume it is intended to do. Some of the main modifications have been included. Examples of included modifications are given below in relation to Key Statement DS1:

Development Strategy:

- MM2 – page 39;
- MM3 – page 39; and
- MM6 – page 39.

However, and very significantly, other modifications have not been included.

Examples of excluded modifications are given below in relation to Key Statement DS1: Development Strategy:

- MM4 – page 39; and
- MM5 – page 39.

This is clearly shown to be the case by the extract from the Core Strategy - Tracked changes version (post 5.14), Key Statement DS1: Development Strategy (as below).

4.2 The proposed preferred option

KEY STATEMENT DS1: DEVELOPMENT STRATEGY

The majority of new housing development will be concentrated within an identified strategic site located to the south of Calthorpe towards the A50 and the main urban areas of the borough, the principle settlements of Calthorpe, Longridge and Whalley. Strategic employment opportunities will be promoted through the development of the Berraw Enterprise Site as a main location for employment, and the Selwicksbury Enterprise Zone. New retail and leisure development will be directed toward the centres of Calthorpe, Longridge and Whalley.

In addition to the identified strategic site at Standen and the borough's principle settlements, development will be allocated to defined settlements listed in this policy. In general, the scale of planned housing growth will be managed to reflect existing population size, the availability of, or the opportunity to provide facilities to serve the development and the extent to which development can be accommodated within the local area. Specific allocations will be made through the preparation of a separate allocations DPD.

The defined settlements are:

Berraw	Diernham	Mulder Brook	Sewley
Bilington	Dunapp Bridge	Newton	Shaldern
Bolton by Bowland	Graburn	Osbaldeston	Tonside
Brockhall	Grindleton	Pandemon	Waddington
Cadarnstone	Holker	Rad & Simonstone	West Bradford
Chalton	Hurst Green	Ribblesdale	Whalley
Chipping	Leigh	Rimington	Winstan
Copster Green	Malter	Sabden	

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. The relevant constraints are set out as part of the strategic framework included in this plan.

Development that has recognised regeneration benefits, is for identified local needs or satisfies neighbourhood planning legislation, will be considered in all the borough's settlements, including small-scale development in the smaller settlements that are appropriate for consolidation and expansion or rounding-off of the built up area.

Through this strategy, development opportunities will be created for economic, social and environmental economic well-being and development for future generations.

Core Strategy Reg 22 with proposed post Rq22 changes Composite .doc

This extract confusingly includes a list of 32 defined settlements, which is very clearly in conflict with the tier 1 and 2 settlements listed in the main modifications table.

Our review of the remainder of the tracked changes document seems to indicate that few of the other main modifications have been included in the tracked changes document. Very significantly, these errors relate to housing numbers, eg contradictory settlement housing numbers are shown at paragraph 4.11 and the housing provision levels under Key Statement H1: Housing Provision are, likewise, in conflict with those referred to in the table of main modifications (ie the tracked changes version refers to housing delivery over the plan period of 5,000 dwellings and a target annual rate of 250 dwellings).

In our judgement, these errors (or at best confusion about what document 3 is intended to do) are so fundamental that the consultation can only be regarded as wholly flawed and misleading. The Council's response may be that the tracked changes document is provided for information only and the schedule of main modifications is the document that should be referred to by those formulating any response. That would be an inadequate response.

Alternatively, the Council may claim that the document is simply a record of previously published main modifications. If so, that is far from clear to the reader. The Council's consultation web page explicitly says that 'Item 3 (*ie the tracked changes document*) is provided to help cross reference the modifications laid out in item 1' (*ie the main modifications table*). So, any viewer / reader should, with confidence, be able to read (and then comment upon) the tracked changes document in the belief that this is the document that the Council is now putting forward, without having to refer to the main modifications table. That may not have been the intention, but it is certainly the impression given.

We conclude that the consultation process is so flawed that it should be re-run and all comments from the consultation ending in July 2014 should be disregarded. This is to ensure that all those making representations are doing so on the basis of a clear understanding of the Council's present intentions. We have no doubt that, to do otherwise, would expose the Core Strategy to subsequent legal challenge. We, therefore, submit to the Council that it should re-run the consultation process. If it does not do so, we would invite the Inspector to advise the Council that the consultation process was flawed and must be re-run before he considers the modifications and representations any further.

Development Strategy - defining the more sustainable settlements and patterns of housing development

This document is provided by the Council as an evidence base to assist in addressing the concerns raised by the Inspector following his examination, with the intention of developing a more refined settlement strategy that focuses development on the more sustainable settlements. It examines the

sustainability attributes of the settlements and the constraints / capacity for growth.

Facilities and services (non-transport related)

Table 1 seeks to identify those settlements that have various services available within the settlement.

It would appear that the information is incomplete. For instance, whilst village halls / community centres are listed, Note 3 to Table 1 confirms that Church Halls have not been listed. No reason is given and, in our judgment, there can be no reasonable justification for such an omission. Church Halls are commonly used in exactly the same way as village / community centres, and can be a significant facility to the local community they serve. They provide community facilities such as toddlers / childrens' playgroups, exercise / sports / recreational sessions, along with a range of other classes and functions such as polling stations.

In counting the number of facilities in Table 6 it appears that if there are two facilities of the same kind, eg Read and Simonstone have two primary schools, this counts as one facility. This contrasts with the approach where a settlement has a primary school and a nursery, as this is counted as two facilities, eg at Ribchester. This uneven approach doesn't reflect the level of provision accurately.

The above clearly shows that the evidence / information upon which the selection of tier 1 and tier settlements is made is incomplete / inaccurate and, thus, unreliable. As such, the outcome of the assessment cannot be relied upon. That is, the Core Strategy proposals are not properly justified.

Transport related services

Table 3 seeks to identify the range / frequency of transport services that the settlements have.

The information for bus services has excluded the bus services X80, 180 and 280 from several villages. These are significant services and provide connectivity from many settlements to key services centres and employment. The services stop in Billington, Copster Green, Osbaldeston and close to Sawley. The bus stop at Sawley is on the junction of Sawley Road with the A59 and is easily accessible to the village on foot. The settlements these services serve should have been included accurately.

Examples of inaccuracies in Table 3 noted include:

- Billington – bus services 180 and 280, running approximately every hour Mondays to Saturdays from Preston to Clitheroe to Skipton;
- Copster Green – bus services 180 and 280 (as above); service 35, running from Blackburn to Chipping via Longridge on a twice hourly basis Mondays to Saturdays and service 25, running twice hourly Mondays to Saturdays from Clitheroe to Blackburn via Whalley;
- Sawley – bus services X80 and 180 (as 180 and 280 above) at 'Smithies Bridge', the junction turn off from the A59 to Sawley, near Browgate; and
- Osbaldeston – bus services 180 and 280 (as above); service 15, running from Mellor Brook to Blackburn every hour Mondays to Saturdays.

This clearly shows that the evidence / information upon which the selection of tier 1 and tier settlements is made is incomplete, inaccurate and, thus, unreliable. As such, the outcome of the assessment cannot be relied upon. That is, the Core Strategy proposals are not properly justified. Indeed, the additional information we have provided demonstrates that there are a number of other settlements (including Billington, Copster Green, Sawley and Osbaldeston) along the 'A59 transport corridor' that are equally as accessible as other settlements identified to be within 'Tier 1'.

Number of Businesses within defined settlements

The chart at page 15 seeks to show the number of businesses associated with each settlement. By its own admission, the table only shows the number of businesses and not the level of employment available. As such, it is of limited value. Its value is even further diminished by reason that only businesses within the settlement boundaries are included. The settlement boundaries are (presumably) drawn from the adopted Local Plan. This Local Plan is now very out of date, adopted in 1998, and the settlement boundaries were tightly drawn around the settlements. The inadequacies of this approach is clearly shown by reference to Osbaldeston. Only 1 business is listed to be within the settlement. Presumably, this is either the Bay Horse Inn or the Maserati sales centre (both within the settlement boundary). So, the figure should be at least 2. In addition, there is a convenience store and petrol sales garage and a primary school immediately adjacent to the settlement boundary, all providing employment opportunities. Furthermore, there are a range of local employment opportunities, including those at nearby Fairfield Farm Business Park (approximately 0.4km to the north east), the Hawkshaw Business Park (a further 0.2km to the east), and the major employment site of BAE Systems Samlesbury (approximately 1.25km to the north east, which forms part of the recently designated Lancashire Enterprise Zone and where the Core Strategy promotes strategic employment opportunities).

Other inaccuracies in the Council's data / the inadequacies of the approach adopted include:

- Sawley – has two businesses within the defined settlement (The Spread Eagle and Riverside Home for the Elderly), rather than the one listed by the Council. Also, Bowland High School provides employment opportunities near (0.85km) to the settlement boundary; and
- Chatburn – Shackelton's Garden Centre / Homeware Shop and Café is outside of the settlement boundary, but provides considerable employment opportunities near (0.2km) to the settlement boundary.

It is also noted that the types of businesses listed under this section seem very arbitrary. Holiday cottages are included which may at most employ a part-time cleaner, whereas residential care homes (which employ high numbers of staff often drawn from the local community) and schools (which employ several people, other than teachers, often drawn from the local community such as welfare staff and cleaners) are not included. The village of Sawley and Chatburn from our local knowledge both have residential care homes. Sawley and Grindleton are both close to Bowland High School. It is not clear how the information that has been used is scored.

These examples, again, clearly show that the evidence / information upon which the selection of tier 1 and tier 2 settlements is made is incomplete, inaccurate and, thus, unreliable. As such, the outcome of the assessment cannot be relied upon and the Core Strategy definition of tier 1 and 2 settlements is not justified.

What does the information show?

Table 6 gives the accessibility score to seven destinations although the destinations are not listed (by contrast Table 4 lists links to nine centres), thus the foundation for the assessment is unclear.

In the table we have provided below, we summarise the scores given to each settlement by the Council. The accessibility to key services centres scores have been amended for Billington, Copster Green, Osbaldeston and Sawley to take account of the additional services we have detailed above, but not accounted for by the Council. These amended scores are shown in (brackets).

Settlement	Number of services in settlement	Accessibility by bus to KSC's	Services + Access to KSC's	A	Access to employment by bus	Services + access to KSC and access to employment by bus	B
Barrow	4	3	7	1	3	10	1
Billington	5	3 (5)	8 (10)	1	3 (5)	11 (15)	1
Bolton – by - B	5	0	5		0	5	

Brockhall	2	3	5		0	5	
Calderstones	0	3	3		1	4	
Chatburn	6	6	12	1	4	16	1
Chipping	6	3	9	*	2	11	*
Copster Green	0	1 (5)	1 (5)		0 (4)	1 (9)	*
Downham	4	2	6		2	8	
Dunsop Bridge	4	1	5		0	5	
Gisburn	3	5	8	1	4	12	1
Grindleton	4	1	5		1	6	
Holden	0	0	0		0	0	
Hurst Green	4	1	5		1	6	
Langho	7	4	11	1	4	15	1
Mellor	8	2	10	1	1	11	1
Mellor Brook	3	4	7	1	3	10	1
Newton	2	1	3		0	3	
Osbaldeston	3	1 (5)	4 (8)	*	0 (4)	4 (12)	*
Pendleton	2	0	2		0	2	
Read and Simonstone	6	3	9	1	3	12	1
Ribchester	6	3	9	*	3	12	*
Rimington	2	0	2		0	2	
Sabden	7	3	10	*	3	13	*
Sawley	3	1 (5)	1 (8)	*	1 (4)	5 (12)	*
Slaidburn	6	0	6		0	6	
Tosside	2	0	2		0	2	
Waddington	3	1	4		1	5	
West Bradford	3	1	4		1	5	
Wilpshire	5	3	8	1	1	9	1
Wiswell	1	0	1		0	1	
Worston	1	0	1		0	1	

The above table shows that the lowest score given by the Council for those settlements classed by the Council as tier 1, for the number of services plus accessibility by bus to Key Service Centre's, is 7 for Barrow and Mellor.

Column A identifies all the tier 1 settlements, as defined by the Council, by a 1. Settlements marked with an * in column A are those additional settlements which have a score of 7 or above based upon the amended information we have provided.

Similarly, the table shows that the lowest score given by the Council for those settlements classed by the Council as tier 1, for the number of services, access to Key Service Centres's and access to employment when added together is 9 for Wilpshire. Column B identifies all the tier 1 settlements, as defined by the Council, by a 1. Settlements marked with an * in column B are

those additional settlements which have a score of 9 or above based upon the amended information we have provided.

This analysis raises two questions.

1. Based on the calculations carried out by Council, why are settlements which appear to have good service provision / transport links, eg Sabden 13, Ribchester 12 and Chipping 11, not included in tier 1 settlements?

and

2. If the bus services links had been correctly attributed to Copster Green, Osbaldeston and Sawley should they not have achieved tier 1 status, given the resultant scores?

To conclude, at best the Council's assessment process appears unreliable. Alternatively, other factors are being taken into account to determine whether a settlement is sustainable listed under constraints and capacity for growth. The rationale behind this is not explained nor is the scoring system explicit. The reader is unable to understand how the conclusions have been arrived at. The process arrived at in determining the settlement hierarchy policy should be sound, accurate and transparent. Unfortunately, that is not the case in this instance.

Our Conclusions

The analysis of information leading to the separation between tier 1 and tier 2 settlements as well being unclear and inaccurate in its methodology produces a document which is (see Council's document, page 17) "broad brush given the timeframe available but it is a helpful starting point". This is an inadequate, unjustified and unsound approach to the formulation of a development Strategy. This is the basis for a Core Strategy policy document that will be 'set in stone' and be used for many years to come. Indeed, the Council is already using the policy document in determining current planning application prior to the completion of the consultation period and examination by the Inspector.

As is evident from the Council's evidence, Sabden is well served by facilities and transport links. Indeed, it is one of the largest of the 32 settlements. It is identified in Table 2 as being wholly within the AONB. Whilst that is the case, we consider that it is too blunt an instrument for the Council to conclude that Sabden has no capacity for growth (if that, indeed, is the Council's position). Indeed, AONB policy (unlike Green Belt policy) is not intended to prevent development. Rather, the policy is to ensure that development is in character. There are a number of sites within and immediately adjoining the settlement that have the potential for residential development without any adverse impact upon the character and appearance of the AONB. Accordingly, we consider that the main modification to Core Strategy Key Statement DS1 has not been justified on the basis of reliable evidence. We submit that Sabden should be identified as a 'Tier 1' settlement, to accommodate growth.

Based upon the sustainability thresholds that appear to have been used by the Council to define some of the tier 1 settlements and having regard to the correct information we have provided above on accessibility, services etc we conclude that the following settlements should also be classed as tier 1 settlements – Osbaldeston, Billington, Copster Green and sawley.

The adopted Local Plan refers to Wilpshire / Salesbury as a single settlement. We consider that to be the correct approach as the two settlements contiguous and to all appearances are one settlement and function as one. Accordingly, and for clarity, the listing of Wilpshire within Core Strategy Key Statement DS1 should be amended to Wilpshire / Salesbury.

To conclude, the assessment cannot be regarded as robust and should not be accepted as the basis for determining the 'tier 1' settlements. That is, the basis for the subsequent main modifications to the settlement hierarchy is not justified. Our view is that the assessment should be carried out again based on reliable information. In the alternative, and for the reasons set out above, we submit that a number of other settlements should (for the reasons set out above) be included within 'Tier 1', including Osbaldeston, Sabden, Billington, Copster Green and Sawley. In addition, we submit that the inclusion of

Wilpshire in the 'Tier 1' list of settlements should be amended to 'Wilpshire / Salesbury', as the two settlements are contiguous and function / appear as one. A re-apportionment of the residual housing requirement would be necessary as a result of the inclusion of these additional settlements.

Technical Note 2 – The Longridge Adjustment

It is noted that the 200 dwelling 'Longridge adjustment' has been re-apportioned as indicted would be required by the Inspector in his 31 January 2014 letter. However, the information upon which the 200 figure is based is no longer accurate. Further to the appeal decision cited in the appendix to the technical note, a planning application has been made for a development of 220 dwellings (Preston CC reference 06/2013/0785) at the same site. The application was granted planning permission in April 2014.

In addition, on an adjoining site (also within Preston CC's administrative area), to the south of Whittingham Lane, an appeal has been allowed for 81 dwellings (PINS reference APP/N2345/A/13/2200445).

The effect of the two planning permissions is that 301 dwellings are to be built within Preston CC's administrative area but adjoining Longridge. Accordingly, if the principle of a Longridge adjustment to the Core Strategy housing provision figures is to be accepted, to be correct the adjustment figure should be 300 and not 200. The use of inaccurate and out of date information results in the housing provision figures as now set out through the main modification to Key Statement DS1 being unreliable and not justified.

Main Modifications

We submit representations in relation to the following Main Modifications:

- MM4 – Key Statement DS1 – for the reasons set out above the list of Tier 1 villages has not been adequately justified as the evidence base is unreliable. Other settlements, including Osbaldeston and Sabden, should be included as Tier 1 settlements (and removed from the list of Tier 2 settlements) as their sustainability credentials are equivalent to the other Tier 1 listed settlements and, in the case of Sabden, its

- inclusion within AONB is not a justifiable reason for exclusion from the list of Tier 1 settlements. The supporting text to DS1 should include a statement / make it clear that the housing figures, and their distribution by settlement as detailed in Appendix 2, are a minimum target to be achieved and not a cap on housing provision within each of the settlements. In particular, the text should refer to any development proposals for additional housing delivery in any settlement would be considered in the context of the NPPF, Key Statement DS2 and the over-riding presumption in favour of sustainable development;
- MM4 – Key Statement DS1 and MM8 – Residual dwelling numbers update - for the reasons set out above in relation to the Longridge adjustment, the housing figures attributed to the various settlements is incorrect and not adequately justified on the basis of up to date information;
 - MM10 – Key Statement EC1 – it is not sufficient to state that the policy statement is to be updated. The intended wording should be provided so that the effect of any modification can be assessed and commented upon;
 - MM12 – Key Statement H1 – we support the update of the annual housing requirement to 280 dwellings, as that is the figure indicated by the evidence from an objective assessment of the Borough's housing needs;
 - MM12 – Key Statement H1 – the NPPF (paragraph 157) states that “crucially, Local Plans should” do a number of things, including “be drawn up over an appropriate time scale, preferably a 15-year time horizon” and “take account of longer term requirements”. The plan period provided for is 2008 to 2028. That is a period of 14 years from now. The period will inevitably be less from any date of adoption. There is no justification for the Core Strategy providing for development over a shorter period than 15 years. As such, the Plan cannot be regarded as sound;
 - MM16 and MM17 – Appendix 2 – we support the update of the annual housing requirement to 280 dwellings, as that is the figure indicated by

the evidence from an objective assessment of the Borough's housing needs (see MM12 above). However, the plan period should extend to not less than 15 years from adoption. It will fail to do so as it falls short of that period. Accordingly, the total housing provision figures for the plan and each of the settlements should be amended (ie they would be proportionally greater, by the extended plan period);

- MM18 – Definition of Settlement – the modified text is versed in absolute terms. That is “Settlements smaller than this limit will not be given settlement boundaries as they are not considered to be large enough or to contain enough facilities to allow for growth beyond that delivering regeneration benefits or local needs housing”. It may be justifiable not to expect the future definition of settlement boundaries. However, it is inappropriate and unjustified to go on to make a statement about restrictions on future development. Rather, the text should be amended to make it clear that any development proposals in such settlements would be considered in the context of the NPPF, Key Statement DS2 and the over-riding presumption in favour of sustainable development;
- MM21 – Key Statement DS1 – please refer to comments above in relation to MM4;
- MM24 – Key Diagram – for the reasons set out above, in relation to MM4, the Tier 1 settlements identified on the Key Diagram should be amended to also include the settlements referred to in our representations further to MM4;
- MM25 – Key Statement DS1 - please refer to comments above in relation to MM4;
- MM26 / MM 27 / MM35 – After para 1.4 - we note the reference in the last paragraph to a review of the housing requirement within five years of the date of adoption. We object to such ‘short-termism’. We consider that the Core Startegy should plan for the long-term. Indeed, NPPF paragraph 157 expects Local Plans “to be drawn up over an appropriate time scale, preferably a 15-year time horizon”. To build in an early review is unjustified, inappropriate, not in accord with national

policy and would create uncertainty for communities, developers, those deciding planning applications and those involved in the phasing and delivery of necessary infrastructure. The last two sentences of the modification should be deleted.

We consider that the main modifications proposed would not make an unsound plan (as regarded by the Inspector) a sound plan. It remains unsound for the reasons given above. In particular, the main modifications are based on unreliable, inaccurate and out of date evidence, which does not adequately justify the main modifications now proposed to the settlement hierarchy.

Conclusion

For the reasons given above, in relation to the misleading nature of the tracked changes document, we submit to the Council that it should re-run the consultation process. If it does not do so, we would invite the Inspector to advise the Council that the consultation process was flawed and must be re-run before he considers the modifications and representations any further.

For the reasons given above, the assessment methodology / information used by the Council in determining the 'tier 1' settlements cannot be regarded as robust and should not be accepted as the basis for. That is, the basis for the subsequent main modifications to the settlement hierarchy is not justified. Our view is that the assessment should be carried out again based on reliable information. In the alternative, we submit that a number of other settlements should be included within 'Tier 1', including Osbaldeston, Sabden, Billington, Copster Green and Sawley. In addition, we submit that the inclusion of Wilpshire in the 'Tier 1' list of settlements should be amended to 'Wilpshire / Salesbury', as the two settlements are contiguous and function / appear as one.

The use of inaccurate and out of date information relating to the 'Longridge adjustment' results in the housing provision figures as now set out through the main modification to Key Statement DS1 being unreliable and not justified.

Our detailed comments on the main modifications are set out in the previous section. In summary, we consider that the main modifications proposed would not make an unsound plan (as regarded by the Inspector) a sound plan. It remains unsound for the reasons given above. In particular, the main modifications are based on unreliable, inaccurate and out of date evidence, which does not adequately justify the main modifications now proposed to the settlement hierarchy.

The Council is invited to reconsider its proposals for the Plan. If not, the Inspector is invited to find the Plan unjustified and unsound.

[REDACTED]

esqued + add'd 4/7/14

Turley main email
No 8609

Turley

4 July 2014

Delivered by email

CORE STRATEGY CONSULTATION

Council Offices,
Church Walk,
Clitheroe,
BB7 2RA

Dear Sir / Madam

RIBBLE VALLEY CORE STRATEGY PROPOSED MAIN MODIFICATIONS, MAY 2014

We are grateful for the opportunity to comment on the Council's Proposed Main Modifications to the Core Strategy on behalf of our client, Taylor Wimpey UK Limited. Our comments focus on four specific matters, as follows:

The overall housing provision (MM8; MM12; MM15; MM16)

Taylor Wimpey welcomes the proposed modification to increase the housing requirement from 5,000 to 5,600 over the plan period. As the Local Plan Inspector identified in his letter of 31 January 2014, the 5,000 figure was a 'hybrid' option which had no clear or fully objective analysis to validate it; would fall short of meeting needs; and was not a sound basis for the Plan.

It is therefore correct that an absolute minimum a requirement equivalent to 280dpa should be applied, to be more consistent with the Council's own evidence and to avoid clear disconnect between the economic and housing aspects of the Plan. But we do not consider this to be sufficiently aspirational / reflective of needs, as the NPPF requires.

The 280dpa (drawn from the Housing Requirement Update by NLP) figure is based upon the most recent economic forecasts born through a period of recession which should be viewed with considerable caution. The 1,600 new job forecast with which it aligns is derived from is a 'policy-off' forecast, and shown to be significantly below the employment growth forecast for the UK and the North West region (Employment Land Review 'ELR', para 9.14). By comparison, the 'Policy-on' Employment Based Forecast presented in the ELR, which takes in to account the significant growth potential of the Lancashire Enterprise Zone, forecasts an overall job growth of 4,900 (over three times the policy-off forecast).

Failing to recognise this clear potential for additional economic growth, and taking a 'neutral' economic line as a basis for the housing requirement, clearly fails the requirement to positively plan and for the Plan to be aspirational. The adverse implications of failing to positively plan for sufficient housing to meet economic growth potential are widely recognised and well rehearsed; the Plan as drafted runs considerable risk of causing such adverse consequences.

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One must also have reference to the Strategic Housing Market Assessment (SHMA). The SHMA, published in July 2013, addresses only affordable housing need, not need for private market housing for sale. As the anticipated cornerstone of evidence on housing need, as directed by the NPPF, the SHMA as drafted is considered deficient.

That said, it identifies a net need for 404 affordable properties per annum. Section 5 of the document considers other sources of supply, including subsidised private rent, and indicates a revised net need figure of 114dpa (although with a significant note of caution). It then goes on to identify in Section 6 that a split of 70% market and 30% affordable (comprising 6% shared ownership, 19% Affordable Rent and 5% new social rented dwellings) should be adopted. On this basis, the requirement for 114 affordable dwellings (as 30% of an overall requirement) would equate to an overall requirement of 380dpa. The setting of a requirement of 280dpa will fall significantly short of the level of provision required to deliver the identified affordable housing need.

Finally, there is the issue of backlog or unfulfilled need. The proposed amended figure of 280dpa, takes no account of the previous under-delivery against the former RS targets, which was an objectively assessed need. This is confirmed in paragraph 3.20 of the NLP report which states: 'It should be noted that the figures below do not include any allowance for backlog; nor do they seek to make a planning or policy judgement as to their suitability'. This unfulfilled need has to be added to the objectively assessed need identified for the Core Strategy.

Taylor Wimpey welcomes the increase but firmly considers that the proposed housing requirement remains insufficient and unsound. It does so by reference to the Council's own evidence of need and the fact that it would not satisfactorily align with the economic potential of the area.

The housing provision figure as an absolute figure rather than a minimum figure (MM12; MM13)

We would further challenge the removal of the words 'at least' from 'Key Statement H1: Housing Provision' and the removal of the words 'these figures will be treated as a minimum target unless otherwise determined' from paragraph 6.4.

The NPPF is clear that plans should be positively prepared (paragraphs 157; 183), should boost significantly the supply of housing (paragraph 47) and 'meets the full, objectively assessed needs for market and affordable housing in the housing market area...'. .

The stated housing requirement, to be consistent with the NPPF, must be treated as a minimum, not just a target, and the words 'at least' should be re-introduced, both for the overall requirement and the annual requirement. The text at paragraph 6.4 also needs to be reinstated.

Distribution / The Longridge Adjustment (MM8; MM15; MM16)

Taylor Wimpey supports the key role that Clitheroe, Whalley and Longridge should have in meeting the majority of the new development, reflecting their scale and role as key service centres within the Borough.

However, Taylor Wimpey objects to the specific proposed distribution of houses as set out at Paragraph 4.11 and Appendix 2 of the document as amended. It is not considered that this represents the most appropriate strategy, or one which is adequately evidenced.

Firstly, the quantum and proportion split between the principal settlements and the Other Settlements is not deemed to represent the most suitable and sustainable of alternatives, with the proportion assigned to the Other Settlements too high relative to the principal settlements.

The distribution to the principal settlements is predicated on there being an 'allocation' of 28.5% of 1,600 of the 5,600 dwelling overall housing figure to the Other Settlements. That is, the distribution amongst the principal settlements by percentage of existing 'main settlement population' is only undertaken once the set 28.5% of the overall requirement is assigned to lower order settlements. We note that this is an increased proportion (albeit marginal, but still important) than the original approach where 28% was attributed (1,120 of 4,000).

These settlements are recognised by the hierarchy (and supporting evidence) to be smaller, with fewer facilities and hence more constrained and less suitable (and sustainable) to accommodate growth than the principal settlements. Whilst this quantum does reflect this distinction to a degree (i.e. that the majority is directed to the principal settlements), this is a notable proportion. With the greater sustainable attributes (and development opportunities) of the principal settlements, a greater proportion should be directed to those settlements, alleviating pressure on the less sustainable lower order settlements. The focus in these areas should be on affordable and local needs.

Secondly, the 'adjustment' made for Longridge is entirely inappropriate and unjustified.

This serves to further unduly understate the role of Longridge, which elsewhere is recognised as a principal settlement to be a focus for growth. It reduces the quantum directed to Longridge, whilst exacerbating the issues above in relation to Other Settlements, which are recognised to be less sustainable than Longridge. Having established that 28.5% of the housing requirement is appropriate to be directed to the Other Settlements, which we would question, a further 200 units is simply moved from Longridge to add to that allowance – then equating to 32%.

The modifications reinforce rather than address this fundamental issue. Simply by providing clarity that the adjustment will be allocated to those 'more sustainable' other settlements, does not address the fact that Longridge is clearly more sustainable as a location than those the adjustment would be directed to. No evidence is presented as to why Longridge could not accommodate the additional 200 units, and why this would not be the most sustainable approach.

Housing Trajectory (MM48) / Non-inclusion of additional strategic sites

Notwithstanding our points in relation to the overall housing requirement, the housing trajectory proposed to be inserted at Section 15 is considered to be flawed, for the following reasons.

The SHLAA, which the trajectory draws from, presents no clear basis for its assumptions as to the lead in to the commencement of development nor the build rates that can realistically be achieved. The SHLAA simply assumes that all sites with planning permission (aside from the strategic sites at Barrow and Standen) will deliver in full during the first five years.

The trajectory assumes that the Standen and Barrow sites will deliver 100 dwellings per year. There is no evidential basis for this assumption, which is considered ambitious at best. We consider that a reasonable expectation of unfettered delivery rate would be, 50 - 60 units per annum, assuming a build rate of 25-30 units per developer outlet, and two outlets on each site, inclusive of affordable units.

In relation to Standen, it is also assumed that it will be fully developed within the Plan period. We are aware that the planning permission is presently subject to challenge and hence there must be significant doubt as to when (or if) delivery can commence. This also assumes that the significant infrastructure issues associated with a site of this scale and character are capable of being addressed in time to allow for unfettered release of development in response to the market. This represents a risk.

Taylor Wimpey supports the principle of the Standen site, but questions the reliance being placed on the site in the context of the need to positively plan and ensure a flexible and responsive planning system. There remains significant doubt as to the rate of delivery and whether the full allocated quantum can be delivered in the Plan period.

The Plan needs to include greater flexibility to ensure that the housing requirement can be delivered should the Standen site fail to deliver at the required rates. This flexibility should be in the form of additional sites and other monitoring / review mechanisms. As our representations to the Examination made clear, the need for certainty and clear direction is paramount, and the Core Strategy should seek to identify additional sites of strategic significance (i.e. crucial to delivery).

Included in this, given its position in the hierarchy, is the importance of allocating strategic housing site(s) for Longridge. This would provide essential, greater certainty that existing unfulfilled and future need for market and affordable housing can be met.

Taylor Wimpey proposes the strategic allocation of Land at Dilworth Lane, Longridge for residential development.

We trust these comments will be taken in to full account and subject to further consideration through the Examination of the Plan.

Yours Sincerely

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copied + added E/A/14.

PRN 6067

Dickman Associates Ltd

Mr J Macholc
Head of Planning
Ribble Valley BC
Council Offices
Church Walk
Clitheroe
Lancs
BB7 2 RA

3.7.14

Dear Mr Macholc

Response to RVBC SHLAA, SHMA and Core Strategy update 2013 re sites owned by the Huntroyde Estate

We act for The Huntroyde Estate, the owners of this site submitted to your SHLAA in 2008 and 2013, namely sites 169, 291, 341 (including site 11), 404 and 407.

Since previous you have accepted representations by letter we again are making submissions by letter rather than on the forms and we understand all representations will be given due consideration.

We have read the suite of amended papers and background documents to the RVBC Core Strategy (CS) modifications following the EiP Inspector's requests, which are currently out for consultation until 7.7.14 and make representations on behalf of our client.

Representations to the Core Strategy Modifications 2014

We understand the CS Inspector's main concerns regarding the soundness of the plan focussed on the need to increase the housing requirement, review and refine the settlement hierarchy and reconsider the methodology used across the borough for deriving the housing numbers and allocation and the method of treating the Longridge adjustment.

1. **Key Statement DS1** in the 4th paragraph should reflect NPPF para 14 subscript 9 rather than say AONB, Green Belt and other similar designations.
2. **New para 4.11 on housing distribution** we understood the CS inspector was seeking a consistent approach across the borough to housing in all the settlement hierarchy. We question whether this revised distribution adequately responds to this. Clitheroe, Longridge and Whalley are still the 3 principal settlements and whilst the 'other settlements' have now been split into 2 tiers

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- the assumption is that the 3 principal settlements should receive the majority of new homes yet the Longridge reallocation is then spread across the Tier 1 of 'other settlements' and Whalley gets zero. Also we note in the local press that a Judicial Review against the Standen application is in process and thus the status of the strategic site and the number of dwellings it can deliver could potentially alter and may be lower than the 1040 currently proffered on the planning application which will impact of the housing figures presented in this modification document.
3. Key Statement EN3 needs amending to take account of recent planning changes so reference to Code for sustainable Homes, BREEAM, Lifetime Homes, Buildings for Life, should be removed.
 4. Key Statement H1 We note that 5600 dwellings over the life of the plan or 280dpa is now to be adopted. This is welcomed but should be noted as being a minimum. We also note in the housing trajectory calculations that the housing delivery rate estimate per site pa for both Standen and Barrow is 100dpa. The LPAs latest housing land availability schedule quotes new builds as 183 completions in the whole of the Ribble Valley for the period 1/4/2013-31/3/14. It also states 65 dwellings under construction at Henthorn and only 26 completions at Primrose Mill. Furthermore sites currently under construction in RVBC area are only achieving 30dpa at best. Therefore an assumption of 100dpa on each of 2 sites is unrealistic and unjustified.
 5. Para 6.4 we strongly object to and have grave concerns over the managed approach to land release as this fetters landowners in what they can do with their land. No explanation is set out as to how this will work and it will have an impact on market forces and the housing market. It flies in the face of the fundamental principle of the presumption in favour of sustainable development set out in NPPF. Also given RVBC's consistent under delivery of housing sites this could propagate that scenario moving forward.
 6. Appendix 2 para 15.1 still refers to an average of 45 dwelling per settlement average for 'other settlements' yet elsewhere the modifications propose 2 tiers for 'other settlements' based on their apparent sustainability criteria. This is confusing, superfluous and should be removed.
 7. Para 4.11 mentions Tier 3 villages whereas the 'other settlements' have only been divided into Tiers 1 and 2. What are Tier 3 villages or is it a typo? There is no mention of Tier 3 villages elsewhere.
 8. Key Statement H3 and Policy DMH1 replace 'elderly' by 'older people' but there is no definition as to what age criteria apply. This needs clarity.
 9. Policy DMG1 should explain how such assessments of POS will be made. Whilst NPPF suggests using PDL before greenfield, RVBC has little or no PDL of any significant size located within its main settlements so surely the presumption in favour of sustainable development has to be the primary consideration as large rural sites that have been PDL may not be in suitable or sustainable locations.
 10. Policies DMG2, DS1 and para 4.2 all relate to the settlement hierarchy and how the 2 tiers for the 'other settlements' has been arrived at. It seems there are potential anomalies in that with Mellor Brook, which within RVBC only has 3 facilities, Note 11 of Table 1 states that facilities adjacent in South Ribble BC area have been recognised. However there is an inconsistent approach as for Wiltshire with facilities in BwDBC on the A666 which include 2 further

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public houses, a PO and a convenience store are not included. Furthermore we must question the rationale as to why the settlement with the most facilities (Sabden) is in Tier 2. This is totally illogical. Sabden should be in Tier 1. In the assessment in the development strategy document of the facilities and services ALL the Tier 1 settlements have fewer facilities and services than Sabden. Of the settlements in Tier 1 the highest are Langho, Mellor and Read/Simonstone - all have 7 facilities, whereas Sabden has 8 according to the details in Table 1 of the Development Strategy document, in fact it is 9 as there are 2 pubs not 1 and we note each tick in the table represents a facility as for example in Barrow which is shown with 2 ticks for public houses, as there are indeed 2 there. Sabden is well connect with bus services to surrounding areas. We object to the inclusion of Sabden in Tier 2. It is a sustainable settlement and clearly one of the larger of the 'other settlements' with the biggest range of facilities and services so absolutely should be in Tier 1. RVBC have already accepted their settlement boundaries need to be reviewed. There are suitable infill sites on the settlement edge which are currently surrounded on 3 sides by development that would be a rounding off suitable for housing development. Such a sustainable site for future housing development including market housing has been noted in the 2013 SHLAA for Sabden and these proposed policies contradict that. The analysis and approach taken to Sabden compared to the other 'other settlements' is inconsistent, not sound and not justified. Sabden should be in Tier 1 and receive an appropriate housing allocation commensurate with its size, scale and sustainability credentials.

11. We do not believe by these modifications there has been a consistent approach to the housing allocations methodology sufficient to address the EiP inspector's concerns and there are still matters which remain inconsistent as we have highlighted.

These comments are in addition to previous representations already made which remain though taking account of any updated data.

My client would wish to attend the inquiry should it be reopened to make representations so we ask to be notified of the dates for this and also any further consultations arising.

Please confirm receipt of this letter and that the matters therein will be put to the Core Strategy Inspector.

Yours sincerely

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copied + checked 7/7/14



Steven Abbott Associates LLP
Chartered Town Planners

HT/LWJ/2376-06 LPA

7 July, 2014

Transmission by email only

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Dear Sir/Madam

CORE STRATEGY MAIN MODIFICATIONS CONSULTATION

These comments are submitted on behalf of the Trustees of the Standen Estate in relation to proposed Main Modifications 12 and 29.

MM12

We support MM12 which increases the housing target to 5,600 dwellings over the plan period. As our previous submissions set out, the housing figure of 5,000 dwellings in the submission version of the Core Strategy did not meet the objectively assessed housing need identified in the evidence base.

A housing figure of 5,600 dwellings will meet the objectively assessed need for the Borough in the plan period, based on the current evidence base.

MM29

Please see the attached document which sets out proposed amendments to MM29.

The suggested changes to the text on phasing better reflect the points discussed in the EIP and the matters which emerged during the consideration of the extant planning permission, and give a more realistic guide to prospective developers.

Partners

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nt standing and qualifications

7 July, 2014

The suggested changes about heritage represent a more accurate relationship between the Strategic Site and local designated heritage assets.

The text as proposed gives the impression that there are designated assets within the site. Furthermore, it is misleading to single out Standen Hall, as other designated assets - those in Littlemoor and The Old Bothy have a closer relationship with the proposed development.

On landscape - we believe this is more accurate in terms of what the Council and the Trustees wish to achieve.

Yours sincerely



Ribble Valley CORE STRATEGY

PROPOSED MAIN MODIFICATIONS

May 2014

Suggested amendments on behalf of The Trustees of The Standen Estate concerning Standen Strategic Site

MM29

Also add text at end of policy statement:

Phasing will be ~~considered~~ addressed through the Development Management process in conjunction with the landowner/s.

This would include the use of the following tools (as appropriate):

- A master plan
- A parameters plan
- Phasing plans
- Conditions on any planning permissions granted or planning obligations (in legal agreements)

~~including the preparation of associated detailed masterplans and legal agreements together with development and design briefs prepared as Supplementary Planning Documents as appropriate.~~

Amend supporting text as follows:

Work undertaken on infrastructure planning as part of the Core Strategy process has shown that in principle, there are no significant barriers to the development and that the site is deliverable within the plan period with appropriate phasing of the development to allow infrastructure enhancements to be coordinated and delivered. It is envisaged that the site will be accessed by a minimum of two access points from the existing local highway network with a through route for public transport. The development will also secure improvements to the strategic highway network at the A59/Clitheroe Road/Pendle Road Junction.

~~Any development should take into account of the presence of various heritage assets and their setting, within and in the vicinity of the site, including the Grade II* Standen Hall and the various grade II listed buildings adjacent to the site and also the line of the Roman Road that runs through the site, which is of archaeological and historic significance. There will be a need for high quality structural landscaping to contribute a good quality development and address~~

Ribble Valley CORE STRATEGY

PROPOSED MAIN MODIFICATIONS

May 2014

**Suggested amendments on behalf of The Trustees of The Standen Estate
concerning Standen Strategic Site**

~~the landscape impacts of a development of this scale~~ The master plan, parameters plan and any detailed proposals should take into account the various designated heritage assets beyond the site and the line of the Roman Road shown on Ordnance Survey mapping.

Any proposals should include high quality landscaping sensitive to the context to mitigate the impact of the development and enhance its environmental and visual qualities.

PRN - 8918

ack'd by email 7/7/14.
+ copied

Joanne Macholc

From:

Sent:

To:

Subject:

Attachments:

Dear Sir/Madam

I would like to reiterate the comments made by the HBF which are enclosed. We would support these representations and raise our concerns to a number of points as raised in the enclosed submission.

Yours Sincerely





THE HOME BUILDERS FEDERATION

CORE STRATEGY CONSULTATION

Council Offices,
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posthearings@ribblevalley.gov.uk

Date: 4th July 14

Dear Sir / Madam

Ribble Valley BC Core Strategy: Proposed Main Modifications

Thank you for consulting with the Home Builders Federation (HBF) on the Core Strategy: Proposed Main Modifications.

The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.

We would like to submit the following representations on the proposed main modifications document.

The HBF would also like to attend any further hearing sessions to debate these matters further.

Main Modifications MM9 (Key Statement EN3), MM33 (Key Statement EN3) and MM39 (Policy DMG1)

The proposed amendments to Key Statement EN3 and Policy DMG1 are considered unsound. They are not considered positively prepared, justified by the evidence or in conformity with national policy.

The modifications to Key Statement EN3 identifies that *'The Council will assess applications against the current code for sustainable homes, lifetime homes and building for life and BREEAM standards, or any subsequent nationally recognised equivalent standards'*. Likewise Policy DMG1 as amended indicates that *'The Code for Suitable Homes and Lifetime Homes, or any subsequent nationally recognised equivalent standards, should be incorporated into schemes'*.

The Council will be of the ministerial statement by Stephen Williams MP on 13th March 2014 which clearly identifies the government's desire to reduce local standards. With regards to the Code for Sustainable Homes the statement clarified that;

'... many of the requirements of the Code for Sustainable Homes will be consolidated into Building Regulations, which would require substantial changes to the content of the current Code, as well as a reconsideration of its role. In the light of this, the Government thinks that the current Code will need to be wound down to coincide with the changes incorporating the new standards coming into force.'

In terms of the energy components of the code, Government has clearly stated that there should be a "Building Regulations only" approach with no optional local standards above the requirements of Part L.

Given the government's push to reduce local standards, the commitment for a zero carbon standard (with the inherent costs) and the fact that the government intends to 'wind down' the Code it is recommended that all references to the Code for Sustainable Homes be removed from the plan.

With regards Lifetime Homes, Government have indicated that there will be an optional accessibility standard which equate to an amended version of Lifetime Homes. Whilst the details of the accessibility standards are still being considered it is clear that to implement such optional standards the Council must clearly justify their inclusion. The HBF is unaware of any evidence provided by the Council to justify the inclusion of a higher standard.

The HBF is generally supportive of providing appropriate accommodation for older persons and other groups and many house builders already provide properties which accord with the Lifetime Homes standard. However the cost of the provision of Lifetime Homes has not been fully factored into the 'Core Strategy Viability Study 2013'. This is clearly contrary to paragraphs 173 to 177 of the NPPF which require the cumulative impacts of all plan policies and obligations to be taken into account. Whilst the viability study (paragraph 7.11) does identify a cost of £1,000 per unit for Lifetime Homes which roughly equates to the mid-point of the costs identified on the Lifetime Homes website (£545 to £1615 per dwelling) it does not take account of other factors associated with Lifetime Homes which will impact upon development viability. These additional costs are associated with the fact that Lifetime Homes generally require a larger footprint but do not provide additional revenue. This impacts upon overall site viability as revenues per unit do not increase but the number or size of none Lifetime Homes dwellings is reduced.

It is recommended that given the Governments approach to accessibility, the lack of evidence justifying a higher standard or the full costs associated with implementing Lifetime Homes the relevant Key Statements, Policies and Supporting Text in the plan be amended. The HBF recommends that the Council seek to **encourage rather than require** such provision.

Main Modification MM12 (Key Statement H1: Housing Provision) and MM13 (paragraph 6.4)

The HBF is generally supportive of the increase in the housing requirement. The proposed modification is, however, considered unsound as it is not sufficiently aspirational and therefore will not boost significantly the supply of housing required by the NPPF.

Whilst the increased housing requirement from 250 dwellings per annum (dpa), included in the proposed changes document, to 280dpa is welcomed it is not considered sufficient to meet the full objectively assessed needs for both market and affordable housing as required by the NPPF (paragraph 47). The HBF previously discussed (proposed changes document representations) the need for a requirement in excess of 300dpa. The reasoning for this is summarised below.

The 2011 background paper on defining a housing requirement and subsequent update in 2013, which takes account of the 2011 based household projections, identifies a wide range of potential growth scenarios for Ribble Valley. Whilst all of the scenarios modelled provide useful hypothetical case studies many cannot be realistically controlled by the Council and therefore should be discounted. The Council's vision is clear that it wants to increase jobs and meet the needs, including housing, of the area.

If the Council intends to achieve its vision and provide for its full objectively assessed needs it should consider a scenario which achieves these aims. The National Planning Practice Guidance (NPPG) clearly identifies that whilst the CLG household projections are the starting point for identifying an objectively assessed housing need, employment aspirations and market signals also need to be taken into account. Therefore the jobs growth scenarios provided by the Council provide an appropriate mechanism to assess the objectively assessed housing needs of the area. The jobs growth scenarios indicate a need for between 280 and 559 net new dwellings per annum. The 280 figure, which the Council is now using to base its housing requirement, is based upon the most recent economic forecasts which are borne through a period of recession. It is therefore plausible to conclude that this figure represents an absolute minimum housing requirement as it is likely to perpetuate current recessionary trends. Indeed the Inspector notes in his letter to the Council (31st January 2014) that; *'a main modification increasing the level of housing growth to an annual average of at least 280 (our emphasis) is necessary for soundness'*. The HBF contends that only meeting this absolute minimum is neither positive nor aspirational. If the Council truly wish to aspire to job growth and seek to positively plan for such growth a figure in excess of 300dpa would appear more appropriate.

The NPPF is very clear that Local Plans need to plan to meet their objectively assessed need for housing (paragraphs 14, 17, 47, 159 and 182). Paragraph 47 of the NPPF further clarifies in terms of housing plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area. The NPPF (paragraph 159) states that the SHMA should be used

to determine 'the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period'.

The SHMA, published in July 2013, identifies a net need for 404 affordable properties per annum. Section 5 of the document considers other sources of supply, including subsidised private rent, and indicates a revised net need figure of 114 dwellings per annum. It then goes on to identify in Section 6 that a split of 70% market and 30% affordable (comprising 6% shared ownership, 19% Affordable Rent and 5% new social rented dwellings) should be adopted.

Given that the Council's policy is for this to be provided by market housing at a rate of 30% (as required by Key Statement H3) this would provide an annual requirement in excess of 342 per annum. In reality the figure would need to be greater than this as not all sites would be able to provide affordable housing at the rate suggested. This figure more closely aligns with the job growth scenarios E (559), Ea (434), F (398) and Fa (315).

The proposed modification also removes the words **at least** from the Key Statement and paragraph 6.4. This is considered to be a negative amendment which removes flexibility for increased levels of house building. It is therefore considered contrary to the aim of the NPPF to significantly boost housing supply and the Inspectors letter to the Council dated 31st January 2014.

In addition, whilst not a main modification, it is noted that paragraph 6.4 still retains its reference to the phasing of sites. This should be removed as it will unnecessarily and artificially constrain the delivery of housing without due cause. The Council should seek to maximise its housing provision by the removal of such phasing, this will result in a greater possibility of the Council achieving its five year supply. The Council has not provided any justification for a phased approach to site release. The Inspector of the Rotherham Core Strategy did in his preliminary findings recommend the removal of a phasing policy as it was not considered to accord with the Framework (Inspectors Preliminary Findings, paragraph 5). The HBF therefore recommends that any phasing is indicative only.

Recommendation

It is recommended that the Council increase its housing requirement so that it is in excess of 300 dwellings per annum. This will enable the Council to meet the full identified needs for both market and affordable housing.

It is also recommended that the words **at least** are re-instated into the policy to provide a more positive plan with greater flexibility and to accord with the aforementioned requirements of the NPPF. The Key Statement should therefore be amended to read (notwithstanding our comments upon the overall housing requirement);

'Land for residential development will be made available to deliver at least 5,600 dwellings, estimated at an average annual completion rate of at least 280 dwellings per year over the period 2008 to 2028...'

Main Modification MM47 (Policy DMG1)

The proposed changes to the policy are considered unsound as they are not positively prepared or consistent with national policy.

The proposed amendments to Policy DMG1 incorporates a new sentence which identifies that '*Previously developed sites should always be used instead of greenfield sites where possible*', this indicates prioritisation of brownfield sites. Such an approach is contrary to NPPF paragraph 111 which states that planning policies and decisions should encourage the effective re-use of previously developed land. It does not prioritise such use. The NPPG (ID 10-025-20140306) identifies that such encouragement should come from reducing the burdens placed upon sites through planning obligations and negotiation with land owners, it does not advocate a sequential approach to the development of such land as inferred by Policy DMG1.

Recommendation

It is recommended that the sentence be redrafted to read; '*The development of previously developed sites will be actively encouraged by the Council*'. The Council may wish to consider ways it can encourage the re-use of such sites through reducing burdens on such sites and liaising with land owners and developers.

Main Modifications MM50 (Policy H3) and MM51 (paragraphs 6.7 and 6.8)

The proposed amendments are considered unsound, as they are not positively prepared or justified by the evidence.

Main Modification MM50 does provide additional clarity to the policy requirements identified within Policy H3, the HBF is however concerned that the Council is seeking in Main Modification MM51 to ensure that all homes for older people comply with Lifetime Homes standards as a minimum. As noted in our comments upon Main Modifications MM9, MM33 and MM39 above our main concerns relate to the full costs of providing such accommodation not being fully assessed and the push by central government to reduce local standards, for brevity these arguments are not repeated here.

Information

I would be pleased to be kept informed of the examination process. I am happy to discuss the comments made within this representation with the Council.

Yours sincerely,

A large area of the document is redacted with thick black horizontal bars, obscuring the signature and any text below it.

Added + agreed 7/7/14
main email
PRN
8604

Turley

7 July 2014
Delivered by email

Planning Policy,
Ribble Valley Borough Council,
Council Offices,
Church Walk,
Clitheroe,
BB7 2RA

Dear Sirs,

RIBBLE VALLEY CORE STRATEGY: PROPOSED MODIFICATIONS CONSULTATION

On behalf of my client Sainsbury's Supermarket's Ltd, we have reviewed the proposed modifications to the Local Plan Core Strategy. I would like to take this opportunity to state that representations submitted on behalf of Sainsbury's against previous consultations of the Core Strategy in respect of Key Statements EC2 (Development of retail, Shops and Community Facilities), DS1 (Development Strategy) and EN3 (Sustainable Development and Climate Change) are maintained and should be fully considered by the Inspector in the Examination process.

I trust that these comments will be taken into account in your progression of the Ribble Valley Core Strategy. In the meantime, please do not hesitate to contact me if you have any queries.

Yours Sincerely

[Redacted signature block]

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agreed + ach'd
7/7/14

PRN 8920



Our ref: 30661

7 July 2014

Planning Policy
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA



Dear Sirs

CONSULTATION RESPONSE: PUBLICATION OF PROPOSED MAIN MODIFICATIONS TO SUBMITTED CORE STRATEGY

We write, on behalf of our client Envidia Homes Ltd, in relation to the current consultation on the publication of the Proposed Modifications to the Submitted Core Strategy, and in particular the document entitled 'Development Strategy: Defining the more sustainable settlements and patterns of housing development'. We set out our observations below.

Development Strategy

It is noted that the Development Strategy has been prepared in response to matters arising during the Examination in Public (EiP) of the Ribble Valley Borough Council (RVBC) Core Strategy which took place in January 2014. The Inspector advised that he could see little justification for grouping all of the 32 settlements in the Borough as one and requested that a main modification be made to clarify how the number of homes required over the plan period will be apportioned and distributed across the 32 defined settlements. The Inspector clarified after the close of the EiP hearing sessions that the overall housing requirement for the plan period is 5,600 units which equates to a minimum of 280 units per annum. RVBC identifies that the residual requirement, when committed development and completions are taken into account is 145 dwellings.

We understand that in order to assess the capacity of each settlement, information has been collated on facilities and services within the settlements, including the accessibility by bus to a key service centre, constraints affecting settlements and the capacity of settlements to grow.

As a result of the data collated, and after eliminating the principal settlements of Clitheroe, Longridge and Whalley, 9 settlements are identified as being most sustainable out of the total 32 settlements. We welcome the identification of Wilpshire within this list of 9 settlements. The residual requirement of 145 dwellings has been distributed amongst the top 9 settlements based on the settlement size (population). Wilpshire is identified as the largest settlement accounting for 29% of the population of the top 9 settlements. Accordingly, it is allocated the largest amount of new dwellings which equates to 45 (approximately 31% of the total of 145 dwellings) over the plan period.

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Having regard for these calculations, we have serious concerns that the proportion allocated to Wilpshire is unnecessarily low. The calculation made, based on population only, is too simplistic and does not take account of sustainability and access to existing services. At a pre-application meeting held on 25 June 2014, RVBC officers confirmed that a services audit has been carried out to inform the Development Strategy. When asked if this audit considered services and facilities within adjoining authorities, officers were not clear but indicated that it possibly only looked at those within the Borough of Ribble Valley. If this is the case we consider it a wholly inappropriate and fundamentally flawed approach to considering the sustainability of each of the settlements.

Wilpshire is a very sustainable settlement, owing to the presence of the Railway Station serving Ramsgreave and Wilpshire, the excellent bus links to both Blackburn and Clitheroe (as confirmed by a Lancashire County Council highways officer at our pre-application meeting) and nearby services and facilities not only in Wilpshire itself but in the surrounding area. The Brownhill area, which is within half a mile from the southern part of the settlement of Wilpshire, comprises a reasonably sized district centre with a range of services including a post office, a public house, a convenience store, a fast food outlet, a butchers, bakery, pharmacy, doctors surgery, a florist, solicitors and a DIY store, amongst others. Brownhill falls within the borough of Blackburn, however it is the nearest district centre for residents in Wilpshire and cannot be overlooked in terms of its contribution to the sustainability of the settlement. In addition, there is a small cluster of facilities close to Ramsgreave and Wilpshire train station, including public houses and local retail units and services.

In light of the above we consider that the proposed allocation of 45 dwellings to Wilpshire is far too low. This is a highly sustainable settlement and the full service offer that is within easy reach of residents ought to be considered thoroughly when apportioning the number of dwellings it can accommodate – basing this on population figures alone is not satisfactory. We consider that to allocate only 45 dwellings to Wilpshire up to 2028 is a major oversight which will result in the need for more windfall sites in the near future, over which RVBC will have little control. On this basis, we request that this figure be modified having regard for accurate data in relation to all nearby services.

Housing Land Supply

At our pre-application meeting with officers on 25 June 2014 it was stated that RVBC has a 5.9 year supply of housing land. We have not undertaken a detailed analysis of all sites included in this assessment, however we strongly suspect that if we did the calculation would be inaccurate.

The National Planning Policy Framework (NPPF) makes clear that the Government is committed to significantly increasing the supply of market and affordable housing. Local Planning Authorities (LPAs) are expected to positively seek opportunities to meet the development needs of their area, and deliver a wide choice of high quality homes, widen opportunities for home ownership, and create sustainable, inclusive and mixed communities. Moreover, paragraph 47 of the NPPF advises that, in order to significantly boost the supply of housing, LPAs should ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing.

Importantly, paragraph 49 of the NPPF emphasises that *'housing applications should be considered in the context of the presumption in favour of sustainable development'*. Our client is promoting a highly sustainable site for residential development in the settlement of Wilpshire which has the potential to make a meaningful contribution to both market and affordable housing needs.

We note that the five-year supply figure identified comprises the following sources:

- Sites subject to S106 Agreements
- Sites with planning permission



- Affordable units not started

Within the above, an allowance is made for those sites considered not deliverable within a 5 year period, including those which may not come forward within the period as they form part of large schemes. We consider it essential to note that even sites with extant planning permission may not all come forward at the rate anticipated. In our experience, working closely with various national housebuilders, the average rate is approximately 30 dwellings per year on any one site. Therefore, a realistic interpretation of the timescales for delivery must be applied when considering housing land supply, or this evidence will be flawed and will lead to a development plan which cannot be deemed to be sound.

Conclusion

We consider that the approach currently taken within the draft Development Strategy document is fundamentally flawed in that the level of development apportioned to Wiltshire is wholly inadequate and does not take account of the highly sustainable nature of the settlement. The process of allocating the proposed number of dwellings to each settlement is far too simplistic and does not adequately consider the varying levels of sustainability between the various settlements.

The NPPF requires that all housing applications are dealt with in the context of the presumption in favour of sustainable development and Central Government has made it clear through this and other documents that housing supply needs to be significantly boosted. We consider that the approach to the allocation of residential sites in RVBC needs to be re-considered in order to comply with these requirements and to make the plan 'sound'.

We trust that we will be kept informed as preparation of the Core Strategy document progresses. Should you require any further clarification on the content of this letter please do not hesitate to contact me.

Yours faithfully

[Redacted signature]

[Redacted text]

copied + added 7/7/14

ARN 8683



ST/MAN.0139/L001v1

07 July 2014

CORE STRATEGY CONSULTATION
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

Dear Sirs

**CORE STRATEGY PROPOSED MAIN MODIFICATIONS- MAY 2014
HALLAM LAND MANAGEMENT**

On behalf of our client, Hallam Land Management Limited, I have the pleasure of providing comments towards the Council's Proposed Main Modifications to the Core Strategy.

Core Strategy Proposed Modifications – May 2014

The document consists of modifications made following the Proposed Main Changes document (August 2013) which have been updated to reflect the most up to date monitoring information from 31st March 2014 and the most recent position since the close of the EiP Hearing sessions.

Key Statement DS1: Development Strategy (MM2 to MM8, MM21, MM25)

As before, the settlements of Clitheroe, Longridge and Whalley are defined as the principal settlements where the majority of new housing development will be located.

Further to the Inspectors comments in relation to the 32 'other settlements', HLM support the new identification of Tier 1 and Tier 2 Villages. HLM also welcome the inclusion of Langho as one of the Tier 1 settlements under Key Statement DS1 – Development Strategy.

HLM also welcome the acknowledgement within DS1 that development should be targeted towards Langho and the other 8 Tier 1 villages in this respect; particularly given Langho was identified as the 4th most sustainable settlement after the 3 principle settlements in the Borough within the Council's Settlement Hierarchy Document.

However, HLM strongly object to the fact that this objective and strategy is not followed through in the Core Strategy and the distribution of housing development. This is evident in the table presented on page 23 of the latest modifications sets out the Council's revised housing distribution strategy.

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Whilst an associated sub-total is not shown, the Council's table demonstrates that 3,872 dwellings will be delivered within the principle settlements (including the Standen site). This represents 68-69% of the planned housing development over the plan period. Clitheroe (including Standen) gets c.41%, Longridge c. 17% and Whalley 10%.

As part of the Core Strategy presented at the EiP, the supporting text for spatial distribution of the 1,600 homes in the other settlements confirmed that on average, this would mean approximately 45 dwellings per settlement. Whilst it was acknowledged that some would receive more development than others (given certain settlements where constrained and there was a wide range in their existing sizes and services), with Langho featuring at the top of the 'other settlement' hierarchy, it was not unreasonable to assume that Langho would receive at least more than 45 dwellings over the plan period.

Indeed, Langho's ranking in this regard remains true in the latest Sustainability Appraisal Report Addendum. Section 3 of this report applies a +/- ranking to a range of various sustainability objectives. If applied as numerical figures, Langho scores the highest with 12 points. The following scores are achieved for the 9n Tier 1 settlements.

- Langho = 12
- Wilpshire = 11
- Read & Simonstone = 11
- Barrow = 10
- Mellor = 9
- Billington = 8
- Chatburn = 7
- Mellor Brook = 7
- Gisburn = 7

With this in mind, it is surprising to see that Langho is only afforded 21 dwellings as part of the Proposed Modifications Core Strategy. This equates to just 0.4% of the proposed total housing development for the Borough. Even when calculated against the 1,600 dwellings afforded to the 32 'other settlements' under DS1, Langho's proportion is still only 1.3%.

This is in contrast to the lower order 'Tier 2' settlements benefiting from 21% of the 1,600 dwellings afforded to the 32 'other settlements'. Indeed, certain Tier 2 settlements like Sabden and Calderstone benefit from 8% (129 dwellings) and 5% (85 dwellings) of the 1,600 figure respectively. Up to 432 dwellings are also to be delivered in locations that are not even afforded a settlement status.

With regard to the Tier 1 settlements, most stark is Barrow's proportion which stands at 710 dwellings: 44% of the 1,600 'other settlement' dwellings and 13% of the Borough's total claimed

housing needs, which is greater than Whalley. This is despite the fact Barrow is ranked the 19th most sustainable settlement in the Council's Settlement Hierarchy Assessment.

A clear disconnect is apparent between the Council's own evidence on sustainable settlement locations and the aspirations of the umbrella Development Strategy in DS1 and the final distribution of housing. In the case of Langho, this is not because it is constrained in terms of suitable of deliverable land for development. The settlement is not within the AONB and the entire northern boundary of the settlement falls outside the Green Belt. The settlement contains a range of day to day services, and a railway station with direct access to Clitheroe, Whalley, Blackburn, Oldham and Manchester, as shown on the enclosed Langho Service Plan (Figure 1). The land to the north is available and is deemed to be suitable by the Council's own SHLAA assessment and HLM have confirmed that it is deliverable within the first 5 years of the plan period.

It is recognised that the disconnect between the Council's overriding aspiration to target development towards the most sustainable locations and the final distribution of housing is down to the fact that large development proposals have been permitted outside of their direct control (i.e. Barrow Lands appeal decision). However, HLM object strongly to the use of those outcomes as they explicitly jeopardise the overall aspiration for an 'equitable and fairer distribution of development' as stated in the supporting text to DS1; and also raised during the consultation at the Regulation 18 (25) stage of the Core Strategy.

It should also not be at the cost of restricting housing development in sustainable settlement locations, particularly when the NPPF seeks to significantly boost housing supply and particularly where those settlements will generate their own housing needs.

No effort has been made within DS1 to highlight that the figures included in the associated table are minimum figures and not capped. MM7 deletes the only text that previously provided some degree of flexibility. Whilst greater clarity was required in relation to the distribution of housing, this should not be at the expense of ensuring there is flexibility in the plan. As modified at present, political members and local residents will attach a significant amount of weight to the figures presented in the DS1 Table (page 23) despite the fact they do not deliver the equitable distribution of housing that was requested by many.

The need for flexibility within the Development Strategy and wider plan is also highlighted by the fact that the Standen strategic site is now subject of a legal challenge which could prevent or at least delay the delivery of the 1,040 dwellings planned for the site.

Finally, it is not evident as to whether the now planned spatial distribution of development (which now hinges heavily on Barrow as an individual settlement) has been given sufficient consideration within the various Sustainability Appraisal Options of the Core Strategy. Indeed, Barrow is not singled out in any of the policies making up the Core Strategy as a strategic location for housing

growth (which it clearly now is). As such, it is not considered the Sustainability Appraisal is capable of assessing this significant modification robustly.

Key Statement H1: Housing Provision (MM12)

In light of the Inspector's interim findings which confirmed that the LPA should be looking to deliver 'at least' 280 dwellings in order to address the soundness of the Core Strategy, HLM welcome the increased housing requirement from 250 dwelling per annum (dpa) to 280 dpa.

However, it is not considered sufficient to meet the full objectively assessed needs for both market and affordable housing as required by the NPPF (paragraph 47). The 280 dpa figure is still regarded as being insufficient in this respect, lacks aspiration and has consequences in relation to the equitable distribution of housing across the Borough.

The rigid application of the 280 dpa figure has repercussions on the spatial distribution of development, and the legitimacy and relevance of Policy DS1. By increasing the amount of housing development over the plan period, so as to provide the other Tier 1 settlements with a more equitable level of housing development, it is considered the issues over DS1 can be overcome. It would also ensure the Council are meeting their full objectively assessed needs for housing.

HLM consider the need for a requirement in excess of 300dpa is justified in meeting the objectively assessed housing needs of the Borough, which is also echoed in the HBF's response.

The 2011 background paper on defining a housing requirement and subsequent update in 2013, which takes account of the 2011 based household projections, identifies a wide range of potential growth scenarios for Ribble Valley. Whilst all of the scenarios modelled provide useful hypothetical case studies many cannot be realistically controlled by the Council and therefore should be discounted. The Council's vision is clear that it wants to increase jobs and meet the needs, including housing, of the area.

If the Council intends to achieve its vision and provide for its full objectively assessed needs it should consider a scenario which achieves these aims. The National Planning Practice Guidance (NPPG) clearly identifies that whilst the CLG household projections are the starting point for identifying an objectively assessed housing need, employment aspirations and market signals also need to be taken into account.

The jobs growth scenarios provided by the Council provide an appropriate mechanism to assess the objectively assessed housing needs of the area. The jobs growth scenarios indicate a need for **between 280 and 559 net new dwellings per annum**. The 280 figure, which the Council is now using as its annual housing requirement, is based upon the most recent economic forecasts which reflect a period of recession. It is therefore plausible to conclude that this figure represents an absolute minimum housing requirement in the short term as it is likely to perpetuate current

recessionary trends. Over the longer term, the 280 figure is likely to be insufficient to meet the minimum need as the recession will not continue over the whole life of the plan.

The Inspector notes in his letter to the Council (31st January 2014) that; *'a main modification increasing the level of housing growth to an annual average of **at least 280** is necessary for soundness'*.

It therefore follows that the Council are only proposing to meet the bare minimum of their current needs in the short term without meeting their minimum needs over the full plan period.

The NPPF is very clear that Local Plans need to plan to meet their objectively assessed need for housing (paragraphs 14, 17, 47, 159 and 182). Paragraph 47 of the NPPF further clarifies in terms of housing plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area. The NPPF (paragraph 159) states that the SHMA should be used to determine *'the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period'*.

The SHMA, published in July 2013, identifies **a net need for 404 affordable properties per annum**. Section 5 of the document considers other sources of supply, including subsidised private rent, and indicates a revised net need figure of 114 affordable dwellings per annum. It then goes on to identify in Section 6 that a split of 70% market and 30% affordable (comprising 6% shared ownership, 19% Affordable Rent and 5% new social rented dwellings) should be adopted.

Given that the Council's policy is for this to be provided by market housing at a rate of 30% (as required by Key Statement H3) this would provide an annual requirement of **380 per annum**. In reality the figure would need to be greater than this as not all sites would be able to provide affordable housing at the rate suggested. This figure more closely aligns with the job growth scenarios E (559), Ea (434), F (398) and Fa (315).

The proposed modification also removes the words **at least** from the Key Statement and paragraph 6.4. This is considered to be a negative amendment which removes flexibility for increased levels of house building. It is therefore considered contrary to the aim of the NPPF to significantly boost housing supply and the Inspectors letter to the Council dated 31st January 2014.

Overall, it is recommended that the Council increase its housing requirement so that it is in excess of 300 dwellings per annum. This will enable the Council to meet the full identified needs for both market and affordable housing.

It is also recommended that the words **at least** are re-instated into the policy to provide a more positive plan with greater flexibility and to accord with the aforementioned requirements of the NPPF.

At the very least, the Key Statement should be amended to read:

*'Land for residential development will be made available to deliver **at least** 6,000 dwellings, estimated at an average annual completion rate of **at least** 300 dwellings per year over the period 2008 to 2028...'*

Assuming this is accepted, it is recommended that the additional 400 homes generated by this increase is distributed across the Tier 1 settlements (except Barrow). This will provide a more equitable distribution of dwellings across the Boroughs other sustainable and important settlements.

Key Diagram (MM24)

Given the resolution of the diagram in the Main Modifications Document it is unclear if Langho station is adequately illustrated on the plan. The train station location might benefit from a different coloured circle. Subject to the inclusion of the above, HLM support the inclusion of the Key Diagram in the Core Strategy.

Conclusions

In summary we do not consider the Core Strategy is sound in particular relation to Key Statement DS1 and H1 on the basis that the objectively assessed housing needs are not being met and the spatial distribution of housing no longer results in an equitable and distribution of housing to the most sustainable settlements in the Borough.

Whilst we trust these representations are clear, given the serious flaws and alterations of the proposed Main Modifications, we urge the Council and the Inspectorate to hold a further EiP day so we can be afforded the opportunity to express our issues verbally and in more detail.

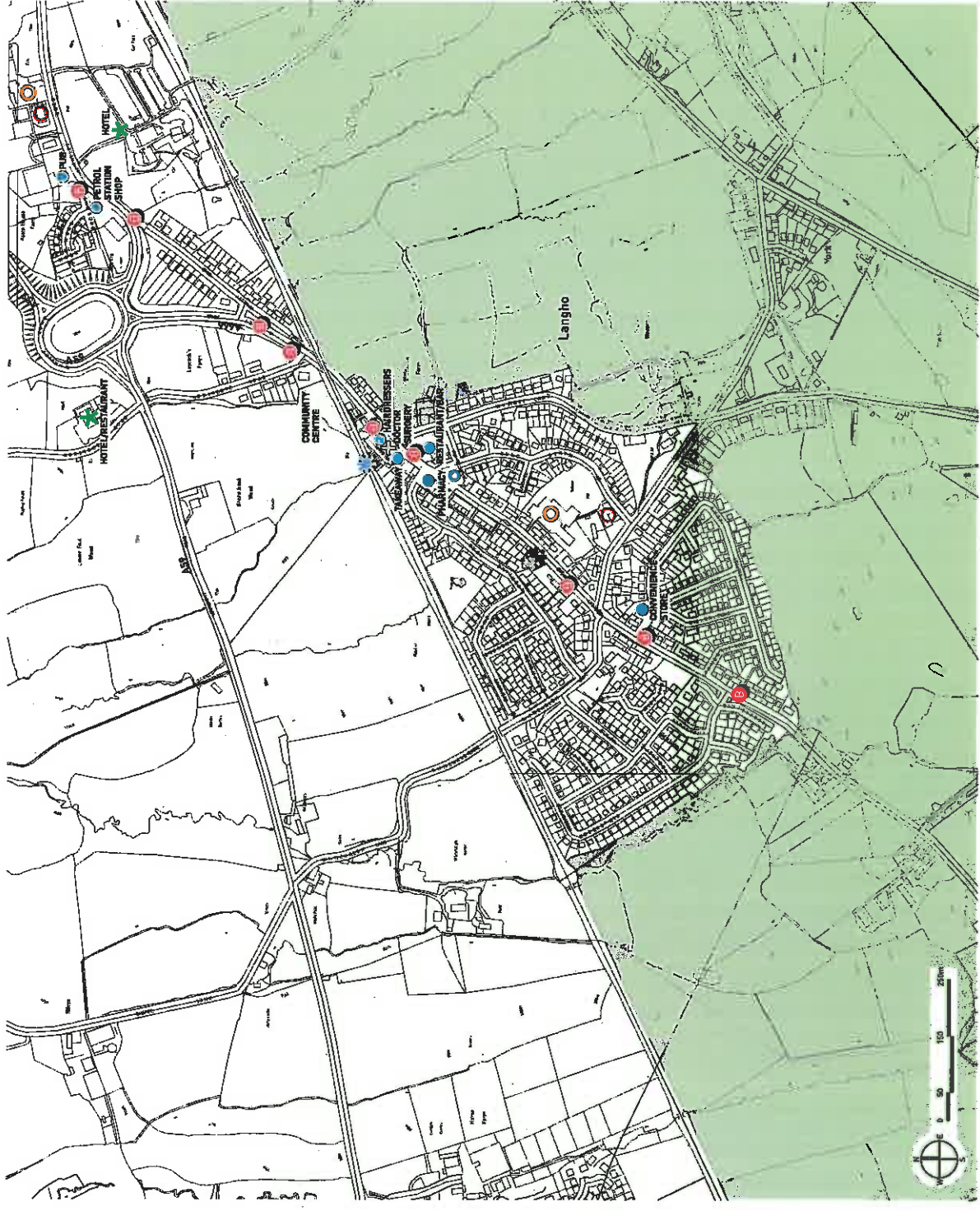
Yours sincerely

A large area of the document has been redacted with thick black horizontal bars, obscuring the signature and any text below it.

Encs.

Figure 1- Langho Service Plan

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Langho, Ribble Valley - Service Plan



I T 01285 641717 | F 01285 642348 | www.pegasuspg.co.uk | Team: MCC/KH | Date: 6th January 2014 | Scale: 1:7500 @ A3 | drwg: MAN.0139_01 | Client: N/A |



Representations to Ribble Valley Core Strategy:

Post Examination Consultation Response – July 2014

1. This document forms a written representation to the latest consultation stage of the Ribble Valley Core Strategy, being the Core Strategy Proposed Main Modifications dated May 2014 and the supporting documents published by the Council and included on the website.

Consultation Process

2. The documents reviewed were downloaded from the webpage below by clicking on the consultation documents button.

https://www.ribblevalley.gov.uk/info/200364/planning_policies/1359/planning_policy_consultation/11

3. The documents for download included a Main Modification Table (Item 1) and a Tracked Changes Version of the Core Strategy (Item 3), which the website states is provided to help cross reference the modifications laid out in item 1. It would appear however that the tracked changes in Item 1 are not consistent with the modifications in Item 3, for example the housing requirement is shown as 5,000 in Item 3 and 5,600 in Item 1.
4. This raises serious doubt over the soundness of the consultation process as it would appear a substantial error has been made in the evidence presented on the website, and this will have impeded the ability of consultees to fully comprehend and respond accordingly to the consultation. We have assumed that it is Item 3, the Tracked Changes Document, that is incorrect, and based our representation on the other documents.

Main Modification 21 & 25 (MM21 & MM25) – Sustainable Settlements

5. These modifications relate to Policy DS1 and supporting text, and also relate to evidence proposed in Item 5 of the consultation documents, 'Development Strategy – Defining the more sustainable settlements and patterns of housing developments', dated April 2014.
6. This documents is one of the key pieces of evidence that the Inspector requested following the initial Hearings of the Examination. The Inspector had stated that this was to provide more distinction between the 32 villages and provide 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.
7. The Council's response provides evidence of the existing population, facilities, services and capacity for growth. With regards this evidence, we have considerable concerns regarding the lack of prominence given to sustainable settlements that have a local railway station, namely Wilpshire and Langho. The train service on this route provides direct access to Clitheroe, Blackburn, Bolton and Manchester and must surely be considered of significant prominence in any discussions regarding accessibility and relative sustainability of growth. The rail service element of accessibility is included in Table 4 of the report alongside bus services to other settlements in adjacent Boroughs.
8. The weight attributed to settlements with rail links and bus links appears to be the same. The former should be weighted more favourably. The presence of a rail service through the Borough is a key benefit to the settlements it serves, and the locations with a regular train services should be seen as locations that can accommodate a significant proportion of the growth in housing numbers across the Borough.
9. The purposes of a Core Strategy approach to housing is to provide a strategy to accommodate housing growth to meet the objectively assessed housing need, but does not seek to allocate specific sites for development, unless they are strategic allocations. Within this, the Council's approach was to provide 1,800 new homes at the 32 sustainable settlements, but set out no further details of how this would be split between the settlements.
10. The Inspector has requested a more detailed strategy to accommodate that growth, but in the meantime however, the Council now consider that 1655 of this requirement has been met and has therefore only provided a strategy to meet the residual 145 dwellings. This is an unsound strategy and inconsistent with the NPPF.

11. Of the 1655 houses committed, that the Council considers provide for the total requirement for the smaller settlements (shown on page 23 of Item 1), 432 houses (24% of the total) are on sites not within the 32 defined settlements or the Principal Settlements. It must clearly be unsound, when such a large proportion of the houses proposed for other settlements, are being provided on unsustainable sites contrary to the development plan strategy. As a practice we are unclear as to where these 432 houses are located, and would seek further clarification as to how these form part of the overall housing growth strategy.
12. In addition, of the 1655 commitment, 710 houses have existing commitment at Barrow (39.4%), much of which was granted on appeal due to the Council's lack of a five year supply. From the evidence provided in Item 5, the population of Barrow was 646 in 2011. Based on an additional 710 houses committed in this location, and using the average person per dwelling ratio in the census of 2.3, provides for an additional 1,633 people in the village of Barrow. This represents more than a 250% increase in the population of Barrow, which is not set out in any detail in the Core Strategy. Surely such level of growth should be considered a strategic matter.
13. The Council does acknowledge in Item 5, that Barrow has been a receptor for growth and is recognised as a main location for employment where strategic employment opportunities will be promoted. It makes no reference however of the potential impact of such enormous growth in housing and population on the village and the smaller settlement strategy of the Core Strategy. Indeed, Item 4c of the consultation includes additional work on the Sustainability Appraisal (SA) that excludes significant amount of development at Barrow, as it would have significantly affected the rural character of a village location and been contrary to the principle of development distribution proposed in the Core Strategy.
14. In essence, planning consents granted at Barrow during the period when the Council lacked a five year supply have become incorporated into their strategy at this late stage, and this approach has resulted in the other settlements identified as being sustainable, being restrained from future growth through the residual approach used. Such an inconsistent approach to growth across the Borough runs contrary to providing for the growth of the existing sustainable communities in other parts of the Borough.
15. With regard to the Council's overall approach to devising a more detailed Development Strategy for the smaller settlements, it would appear to be derived from a view of accommodating a specific residual amount of housing to meet the requirements, rather than the overall amount of housing growth. This retrofitting of a strategy to accommodate existing consents granted since 2008 highlights the main issue with a Core Strategy that has

yet to be adopted, but has a plan period that begins six years prior to potential adoption (if subsequently adopted in 2014).

16. The Council's conclusion of the new devised strategy for smaller settlements that relates only to the distribution of the residual amounts of housing, rather than the whole requirement is evidenced in Table 9 of Item 5, which provides for three levels of residual apportionment across the nine more sustainable settlements, excluding Barrow.
17. For the table on Page 23 of the Main Modifications, the Council has worked this residual apportionment figures backwards to provide a total number of houses required for each settlement over the plan period, by adding the existing commitments to each settlements.
18. The correct approach for the Core Strategy must surely be to provide a proposed level of growth for each of the smaller settlements, to accommodate the 1,800 new dwellings of the strategy. Whilst consideration of the residual amounts is needed to demonstrate the villages can accommodate such growth, this is only really needed to be prominent when the Site Allocations are proposed, in a subsequent plan.
19. An obvious question raised with this approach, would be what happens to those houses committed that are not consistent with the Council's proposed strategy, which includes the majority of houses at Barrow and the 432 not within the sustainable settlements, which are clearly contrary to the Council's proposed strategy. As this is a figure of approximately 1,000 houses, the Council must be careful to consider the likely impact on their overall strategy of these houses and particularly on Barrow, and should provide more evidence in the SA.
20. We do not consider that the houses at Barrow will be likely to be delivered within the Core Strategy, particularly with consideration of the total number of houses proposed in that area; with Standen and those already committed towards the south of Clitheroe, at Henthorn Road and on other sites totalling over 2,000 new homes proposed to be built within the remaining 14 years of the Core Strategy, less than 2 miles from each other. The impact of such development, and likelihood of the market and house building industry to have capacity to develop 150 homes per annum in such close proximity must surely be questioned further in Examination. Some of these houses will more than likely be delivered beyond the plan period.
21. Therefore, we would propose that a suitable level of growth is provided to the sustainable settlements of the Borough initially without consideration of the existing commitments, and

where existing commitments will provide beyond that level of housing for a particular settlement, that this does not remove the need for growth in the other sustainable settlements. Such an approach is already taken in the assessment of Whalley, as shown in the Table on Page 23 of the Main Modifications document.

22. Whalley has a requirement in the Strategy for 520 new dwellings, and an existing commitment figure of 588, and the residual figure in the table is shown as 0 (+68). No other locations are proposed to have housing removed from their plan requirement as a result, and such an approach should also be taken to the Strategy for the sustainable settlements.
23. Should the Council have concerns that the level of growth in the sustainable villages cannot accommodate the 1,800 dwellings proposed, (without reliance on 710 at Barrow and 432 on unsustainable sites) we would recommend that these houses are redistributed proportionally to the Key Settlements of the Borough, with a particular focus on areas that can accommodate additional growth with limited relative impact, such as Longridge and to a lesser extent Clitheroe, as this already has a large proportion of growth as detailed above.
24. In this regard, further consideration should be given to the actual need for the Longridge adjustment, on the basis of the overall increase in housing land since the initial submission of the Core Strategy, and in light of the revisions to the Strategy that we are proposing for the smaller settlements. Longridge represents a sustainable town with excellent public transport links and local services, very few constraints, and readily developable areas to accommodate additional housing growth. Since the submission version of the Core Strategy, Longridge has retained its proportion of new housing whilst the overall figure has increased.
25. Whereas other areas have been reassessed in terms of the capacity of the area to accommodate growth beyond the initial proportion of 4,000. Longridge has seen a proportional increase, whereas its potential capacity to take an additional proportion of the growth across the Borough has not been assessed. We consider that the area can accommodate substantially more than has been proposed, which is evidenced by the recent emergence of sites that were promoted for development at the Examination Hearings and since.
26. The National Planning Policy Framework (NPPF) highlights that the social role in sustainable development is to support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations. The Council's approach to defining settlement growth based on a residual figure fails to do this adequately as it focuses housing growth in the smaller settlements on Barrow and non-sustainable locations through existing commitments.

27. The NPPF also states that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should, inter alia:
- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes) and
 - identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
28. In paragraph 55 it also states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.
29. The Council's approach to defining settlement growth based on a residual figure fails to do this adequately, with many sustainable settlements missing out on potential and much needed growth due to the residual approach taken. Without growth, these settlements may see the future diminishing of key existing services, and future population issues as emerging householder's move out of the area where they cannot afford to live in a village if no new development is proposed.

Sabden

30. With regard to the proposed groupings of the 'more sustainable' settlements, it is difficult to see how the outcome of the evidence has been derived, and we see it as being unfortunate that the Council has not seen fit to consider the existing population size of the settlements until after the assessment of accessibility etc has considered which are more sustainable locations for growth. In this regard, the village of Sabden has a population of 1,371 in the 2011 census and is therefore one of the larger villages of the Borough. It also scores well in the criteria summarised in Table 6 of Item 5, having the joint highest number of services and scoring relatively highly with those villages chosen as 'more sustainable'. As the reason is not set out in detail why it is not considered one of the 'more sustainable' settlements, one can only assume that it must be because of the constraints set out in the table, namely that it is within the AONB. The AONB however, does not seek to fundamentally restrict any new housing, indeed previous planning consents have been granted in the village. Given the relative size of the village and acknowledging its sustainability credentials, and the need for housing growth across the Borough, we consider that the village of Sabden should also be considered as one of the 'more sustainable' settlements.

Item 4a - Technical Note regarding assessment of additional houses.

31. A similar approach to only considering the residual amount of housing needed has been taken by the Council regarding the SA. This is set out in the Technical note regarding assessment of additional houses that forms part of the consultation, which states that the previous increase in proposed housing from 4,000 to 5,000 is relatively small as it results in only 233 residual units. Although this has now been proposed to increase further, to 5,600, a similar conclusion is made in the technical note.

32. We maintain our objection to this approach as it does not consider the potential impact of locating such levels of development in one area, to the south of Clitheroe, whilst restricting development at other sustainable locations through the residual approach.

Summary

33. In summary, we consider that despite the proposed modifications the proposed Core Strategy is unsound.

Positively prepared

34. The proposed strategy is unlikely to meet the objectively assessed development requirements, through focusing too much housing development in a particular location close to the strategic site at Standen, and does not allow for the future provision of sufficient growth of sustainable villages and communities across the Borough as a result.

Justified

35. The Core Strategy is not supported by sufficient evidence, as the housing strategy for other sustainable settlements has been devised purely on a residual consideration of housing requirements based purely on housing numbers, rather than distributing housing need across the Borough consistent with particular settlements.

Effective

36. The plan is unlikely to be effective and deliverable over its remaining plan period due to the close proximity of much of the existing commitments, and a failure to acknowledge the likely delivery of these houses during the plan period, that requires unrealistic annual build rates in small areas of the Borough.

Consistent with National Policy

37. The plan does not provide for sustainable development in that it will fail to accommodate growth of communities in the smaller sustainable settlements of the Borough, contrary to policy in the NPPF.

copied + added 7/7/14

PRN 5534

Our Ref: HA16747/PAL?SJE
Your Ref: Post Hearings May 2014

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07 July 2014

Dear Sirs

Ribble Valley Core Strategy Consultation on Main Modifications Summer 2014

Carter Jonas has submitted representations throughout the evolution of the Core Strategy and has suggested amendments during that process. Principally these have sought to ensure that the interests and concerns of Stonyhurst College and Estate (a Registered Charity) are taken into account in the preparation of the document.

To some extent changes have been made (to the draft Core Strategy) which recognise the role of the school as a major employer, land owner and the importance of the Estate and buildings as a cultural heritage asset.

During the course of the Core Strategy preparation, there have been changes in policy at the national and regional level. These are recognised as affecting the timescale for preparation and it is important that the Core Strategy reflects such policy drivers and, as part of the Local Plan, presents these to address local circumstances.

Consistently we have maintained concerns regarding the housing requirement along with the spatial strategy and settlement hierarchy which forms the main driver to distribution of housing and economic development. These concerns were highlighted at the recent Examination sessions and raised as matters by the Inspector. These remain issues and are the principal considerations in the Main Modifications proposed by the Council.

Our consideration of these matters is set out in the following sections and the relevant forms are attached. Some 57 Main Modifications are presented in the document and these are addressed in numerical order where they are relevant to our earlier representations.

As an observation we would suggest that the layout of the Main Modifications documents are somewhat difficult to follow in terms of order and there is a lack of clarity in some of the changes made to the Core Strategy document.

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MM1 – Objective

Changes have been made to the objective; however we consider that it should more adequately reflect the Government aspirations for the planning system as set out in the Framework and numerous Ministerial and Budget statements. This is to substantially boost housing delivery in order to address affordability, provide choice and support economic growth.

We would suggest a revised wording to the objective as follows

“To substantially increase the supply and delivery of decent homes to address affordability and meet identified local needs.”

We consider that this would better suit the Council’s aspirations set out in the other Main Modifications (subject to our other comments).

MM2 DS1 Para 1

There is a simple spelling mistake (princip/e) which needs to be amended. This does not change the context of the statement. The Modification would add clarity to the policy.

MM4 DS1 Para 2 Changes

As MM2.

MM5 DS1 New Para 3

Carter Jonas has suggested the need for clarity with the Settlement Hierarchy suggesting that a distinction should be made between those settlements which are capable of accommodating a greater proportion of sustainable development and those which are not. This approach has been advocated on the basis that sustainable development should support and enhance vital and viable communities and help maintain the facilities within them so that they continue to thrive, not wither.

Core planning principles in the Framework suggest that planning should be about proactively driving and supporting economic growth and responding to wider opportunities for growth, not simply scrutiny. It recognises that it should take account of different roles and characters of different areas recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.

A number of changes are proposed to DS1 to distinguish between settlements and driving growth to the principal settlements and then considering the potential for the smaller settlements to accommodate growth. Much of the work undertaken by the Planning Team recently has focussed upon settlement hierarchy and has to be welcomed. We would suggest that Hurst Green should be recognised as a Tier 1 Villages given the number of services and facilities on offer in the settlement, the proximity and presence of Stonyhurst College and Estate the direct and indirect (for example, supply chain) employment that it provides.

When interpreting the outcome of that exercise however, we consider that the balance of the draft policy DS1 for the lower order settlements is wrong. We object to the proposed policy

wording as this runs counter to the Framework NPPF to deliver balanced and sustainable development. Whilst development should be focussed upon the larger more accessible settlements, we would suggest that the policy should support measures which enhance the sustainability of the smaller settlements for example as a focus for market housing where this will provide local needs housing and deliver regeneration or sustainability benefits. It should be recognised that 90% of affordable housing across the District is provided as a direct consequence of market housing development.

Recognition should be given to the fundamental purpose of the Framework which is to boost the supply of housing and guide planning authorities to approve applications where the benefits of doing so outweigh any significant adverse effects. Paras 54 and 55 outline the approach to housing in rural areas, suggesting that local planning authorities should consider where the provision of allowing market housing would facilitate the provision of affordable housing to meet local needs. We would suggest therefore that this element of the policy should be worded as follows:

"In the remaining 23 settlements development will be supported where it meets market and local needs or delivers regeneration benefits. These Tier 2 settlements are"

As an observation the SEA and SA – SA Report Addendum produced by the Council's consultants (Hyder) does not seem to distinguish between the different tiers of the villages. As a consequence we consider that the revised policy has not been subject to robust SA assessment and is therefore unsound.

MM6 DS1 New Para 4

Within this proposed Modification we would support the position that national designations (i.e. Framework Footnote 9) should be considered as part of the allocations process in subsequent documents as well as in the determination of planning applications. We would suggest however that the proposed Modification is not sound.

As worded it would suggest that the designation itself is a consideration. We would suggest that reference needs to be given to the "purpose" of the designation and the extent to which particular sites contribute to that purpose "when establishing the scale and form of development".

In our view the Framework does not preclude development or the allocation of sites within the Green Belt or AONB's, but suggests that the development planning process is the most appropriate forum for identifying development sites.

We would suggest a modest amendment to the paragraph as follows

*"In allocating development, the Council will have regard to **the purposes of AONB, Green Belt**"*

In addition we would suggest that for the Forest of Bowland AONB, that the policy should also make reference to the AONB Management Plan.

MM7 Para 4.11

It is proposed to remove this Modification as a consequence of amendments to DS1. This is broadly supported where it clarifies housing distribution.

MM8 Table and Footnote

We object to this Modification as we consider that the Local Plan should be seeking to deliver a greater range of housing and that the 5,600 dwelling target should be seen as a minimum over the Local Plan period as well as to make up for any previous shortfall, and that windfall sites should be seen as a bonus. We would suggest that the residual method should not be prescriptive and that the Council should seek to deliver as many houses as possible, where people want to live and where people need to live and which can address the substantial affordability issues in the District..

On this basis we would suggest that the table should be deleted as it will be simply out of date and does not provide an appropriate basis for the identification of allocations in a subsequent DPD.

MM9 KS EN3

It is important that the Council seeks to ensure that the construction of dwellings and other buildings will contribute to energy efficiency and the highest standards set out in terms of Building Regulations. We would suggest that reference to other standards should be treated with caution where they merely duplicate the Building Regulations regime.

MM12 KS H1 Amendments

In line with our comments on MM8 above, we consider that the 5600 should be seen as "a minimum" and the Council should make every effort to exceed it. The changes set out in MM12 are unsound. The words "at least" should be reinstated into the policy text.

We would suggest that the reference to a "plan-monitor- manage" (Para 3 of the Policy) approach should be removed as this is not consistent with the Framework.

MM13 Para 6.4

We object to the MM13 and suggest that the Core Strategy should remain unchanged in this regard. It may be appropriate for the Council to remove reference to "phasing of development" in the second sentence of Para 6.4 as this approach is not consistent with the Framework and is therefore unsound.

MM14 Appendix 2

As outlined above the assessment of residential development should be to recognise how successful the policy is in delivering new housing across the District, not as a tool to restrict future supply and delivery.

MM15 App2 Para 15.1

It is appropriate that the policy text recognises the housing requirement as a minimum figure. Reference should be made to windfall housing sites being a bonus and additional to any supply achieved from allocated sites.

MM21 Table at 4.11

As outlined above the assessment of residential development should be to recognise how successful the policy is in delivering new housing across the District, not as a tool to restrict future supply and delivery. See comments on MM4 above

MM24 Key Diagram

Broadly the amendments to the Key Diagram should reflect changes to the policies. We suggest that the list Tier 2 settlements are not referred to as "less sustainable".

MM25 KSDS1

See comments above.

MM26 New Text after 4.11

It is considered that this proposed change will add greater clarity to the Council's approach on subsequent planning documents. See comments above .

MM27 New Text

It is not clear what this MM is.

MM28 Monitoring

In line with comments outlined above we would suggest that the Council's annual monitoring activity should be used as a tool for measuring the success of the policy in the Core Strategy. We would suggest that the monitor for Policy H1 should be a "minimum" of 280 per year.

Conclusions

It is welcomed that the Council has undertaken additional background work to assess the settlement hierarchy. We consider that it is appropriate to make the distinction between settlements which currently have facilities and those which don't. We would suggest however that the approach of the Policy DS1 should not restrict development in the lower order settlements but should be one of increasing their vitality and vibrancy. The Core Strategy should reflect the Framework to deliver new housing for market and local needs, including specialist provision.

The SA undertaken by the Council's consultants does not appear to distinguish between the approach proposed by the Council in Policy DS1.

In terms of the housing requirement the Council should be considering the delivery of 280 dwellings per year as a minimum on allocated sites. Windfall sites should be seen as a bonus. Where this figure is surpassed being a sign of success, but not as a rationale for reducing housing provision in future years.

Please do not hesitate to contact me if you have any queries.

Yours sincerely

A redacted signature consisting of two thick, dark horizontal bars.

Copied + added 7/7/14 per 8685



Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA



Ref. PWA_13-039

7th July 2014

Dear Sirs,

**RIBBLE VALLEY CORE STRATEGY 2008 – 2028: A LOCAL PLAN FOR RIBBLE VALLEY
PUBLICATION OF PROPOSED MAIN MODIFICATIONS TO SUBMITTED CORE STRATEGY**

We act on behalf of a number of landowners and developers in the Ribble Valley area and as such further to the publication of proposed modifications to the Core Strategy 2008 – 2028 A Local Plan for Ribble Valley we wish to make several observations and comments in respect of the proposed 'Main Modifications'. We acknowledge that at the current stage of the preparation of the Core Strategy for Ribble Valley we should now refer only to concerns on the soundness of the plan as per the guidance at paragraph 182 of the NPPF, which states that *a local planning authority should submit a plan for examination which it considers is "sounds" – namely that is:*

- *Positively prepared*
 - *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- *Justified*
 - *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- *Effective*
 - *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- *Consistent with national policy*
 - *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

Following the EIP hearings the Inspector wrote to the Council stating that he could see little justification for grouping the 32 defined settlements as one. We consider that there remains little justification for revisions to the Core Strategy for the grouping of the defined settlements into Tier 1 and Tier 2 settlements as set out in the Main Modifications (MM21 & 25). The Authority recognises in its own evidence base document 'Defining The More Sustainable Settlements And Patterns Of Housing Development' that the analysis *"is broad brush given the timeframe available but is a helpful starting point"* which indicates that this report alone cannot be considered to be robust and compelling evidence to support the shift in the hierarchy of settlements which is set out within the Core Strategy Modifications.



The submitted Core Strategy states that specific allocations will be made through a separate allocations document, however by clearly defining the precise number of dwellings across each of the Tier 1 settlements in the manner set out in the Main Modifications the proposed Core Strategy would leave little scope for the Site Allocations DPD to have any meaningful purpose.

Elements of the proposed Core Strategy remain at odds with the core principles of the National Planning Policy Framework in delivering sustainable development (para 14), boosting significantly the supply of housing land (para 47) and in reflecting the vision and aspirations of local communities (para 150) and the proposed Core Strategy is considered unsound in the context of paragraph 182 for the reasons set out herein. It is clear that the extent of fundamental changes to the Plan render it unsound and it should not be adopted, moreover the Local Authority should begin the process afresh in order that proper and meaningful consultation on the fundamental principles of the strategy for the Borough can take place. To make such fundamental changes from what the Council had consulted upon (Regulation 19) as the preferred strategy, and to make subsequent changes yet again, leads to a situation whereby the plan before the inspector is now significantly different from that previously widely consulted upon, particularly in the context of making a shift from a relatively large amount of housing across small settlements to now instead focussing this upon 8 Tier 1 settlements with no consultation with those communities.

The Core Strategy states that *"It is important to remember that, in accordance with the regulations, the invitation to make representations at the Regulation 18 (25) stage relates to what issues and information the Core Strategy should contain and therefore changes to approach in future Core Strategy production will only be affected by representations which relate to content or queries of 'soundness'. All representations that relate to the proposed content of the Core Strategy have been logged and considered and information included in the Regulation 19 (27) Core Strategy, where appropriate."* In this context the most recent opportunity whereby stakeholders were able to make representations in respect of the key issues and preferred strategy concluded in August 2011. Meaningful engagement and collaboration with neighbourhoods is required by paragraph 155 of the NPPF; it is clear that these most recent changes, which are clearly very significant for the residents and stakeholders of the now proposed Tier 1 and Tier 2 settlements have not been proactively engaged in the process of preparing the 'Defining The More Sustainable Settlements And Patterns Of Housing Development' nor the 'Main Modifications' documents.

In support of the proposed modifications the Authority have prepared an up to date Housing Land Availability Schedule (April 2014) document. It is considered that this schedule is presented in such a manner that it fails to demonstrate any evidence of deliverability. Some 600 homes anticipated to come forward within a 3 year period are reliant on just two development sites at Standen and Barrow. Whilst the decision notice has recently been issued for the Standen development this is now the subject of challenge by Judicial Review. Moreover the Council does not provide any information to demonstrate the evidence upon which it expect this major development to commence in 2016 and deliver 100 dwellings per annum thereafter. It should be noted that condition 3 of the planning consent (3/2012/0942 refers) relating to the Standen site requires that a phasing plan including the parcels which shall be the subject of separate reserved matters applications shall be submitted to and approved in writing by the Local Planning Authority. Clearly the discharge of conditions, reserved matters and the associated major infrastructure requirements will lead to significant delays in the commencement of development of the site.

The Authority proposes that whilst completions in 2012/2013 were just 183, anticipated delivery for the 2013/2014 year will rise to 422. It is considered that the evidence provided in respect of the large sites does not meet the requirements of the NPPF at paragraph 47 with regards demonstrating that these sites are indeed deliverable within these anticipated timescales. Clearly, given that this evidence base document feeds into the Main Modifications document at pages 19 and 23, the Authority have made a number of presumptions without adequate evidence which renders Main Modification 16 and the further table at page 23 not effective and the plan unsound on the basis of not having been demonstrated that it is deliverable over the plan period.

On the matter of housing land requirement and delivery in terms of the Core Strategy document itself, the housing trajectory set out at page 39 of the Main modification document is grossly inadequate. The figures behind this representation are not provided and it is impossible to decipher the precise expected delivery of housing over the plan period. It is also apparent that the Authority have simply averaged the 5 year supply figure of 2711 across the entire period, adding 100 per annum from 2016 onwards in relation to both the Barrow and Standen strategic sites. Such an approach to the housing trajectory illustrates that the Council have not considered site specific evidence of delivery to an adequate level of detail and instead have taken a broad brush approach based on presumed delivery rates. Indeed further evidence of this generalised approach to housing delivery is set out in the Housing Land Position Statement footnote 4 at page 7a which acknowledges that a full assessment of deliverability has not been completed.

The document (number 3 on the LPA website) entitled "Core Strategy – Tracked Changes (post 5.14)" states housing figures of 4,000 over the plan period. This should be raised to 5,600 (280/annum) as per the comments from the inspector, and whilst this can be cross referenced with the Main Modifications table it is clear that the Authority have failed to clearly demonstrate the changes to ensure that the recent consultation is effective.

In summary there are a number of discrepancies in the documents published for consultation and moreover there is a significant lack of clear demonstration of that the plan can be reasonably considered to be deliverable. The Authority have failed to demonstrate robust and credible evidence behind the proposed strategy for the Borough and in this respect it cannot be considered to be Justified, Effective nor is it Consistent with National Policy. Having regard to paragraph 182 of the National Planning policy Framework the Plan is unsound.

Yours Sincerely,



*copied + added as valid within
8/7/14 7/7/14 deadline*

PRN 8928

**BARTON
WILLMORE**

Ribble Valley Core Strategy

Proposed Main Modifications

Representations on behalf of Barratt Homes (Manchester)

1.0 Introduction

- 1.1 Barton Willmore is instructed by Barratt Homes (Manchester) ("Barratt Homes") to submit representations on its behalf responding to Ribble Valley Borough Council's ("RVBC") proposed Main Modifications to the Local Plan Core Strategy.
- 1.2 We have been involved in the Examination process on behalf of Barratt Homes, having submitted Hearing Statements in respect of Matters 2 and 3 and attended the related Hearing Sessions.

2.0 Response to Proposed Main Modifications

Main Modification Ref: MM12

Key Statement H1: Housing Provision

- 2.1 The Inspector's letter to RVBC, of 31 January 2014, confirmed the concerns that we expressed, on behalf of Barratt Homes, at the Matter 2 and Matter 3 Hearing Sessions of the Examination. It was clear that RVBC was pursuing a low growth housing target that would not even come close to meeting either the objectively assessed needs for the Borough, and in particular the economic growth strategy of the Local Plan would not be delivered.
- 2.2 In this context Barratt Homes welcomes the increase in the overall housing requirement from 250 dwellings per annum (dpa) to 280 dpa over the Plan period. However, we have serious concerns that the requirement remains low, with RVBC pursuing the lowest possible housing target in order to help deliver a low-growth economic led, jobs growth scenario and with a misdirected spatial distribution which still places an overemphasis on development within lower order and less sustainable settlements. This approach is inconsistent with national planning policy, which

requires Local Plans to enable sustainable development, be positively prepared and to meet the full, objectively assessed needs for market and affordable housing.

- 2.3 Barratt Homes is also concerned over the way in which the requirement is expressed in Key Statement H1, as modified.
- 2.4 Our Hearing Statement responding to the Inspector's questions under Matter 2, and our comments at the Hearing Session itself, highlighted the fact that the 280 dpa figure was the minimum level of housing growth required in order to deliver the 100 jobs per annum growth "aspiration" of the Council. Our Matter 2 Hearing Statement highlights the fact that the Council's jobs growth forecasting, taken from the Ribble Valley Employment Land Study 2013, which is in turn translated into the 280 dpa figure in the Ribble Valley Housing Requirement Update 2013 ("HRU"), stems from 'Policy Off' economic forecasting. A 'Policy On' approach would take account of the introduction of the Enterprise Zones and the related, accelerated jobs growth that this brings, which according to the HRU is more than three times greater, requiring a higher corresponding level of housing need. Consequently, the 'at least' 280 dpa requirement is based on the lowest possible economic growth scenario, not reflective of the actual 'Policy On' position and in intention to plan positively for future growth, as encouraged within national planning policy.
- 2.5 The economic forecasting used to determine the various job growth scenarios in the HRU are recessionary based and the significant period of economic sterility thereafter. This means that they are reflective of a period of significant economic decline. The resulting forecasting is therefore potentially artificially low and not reflective of a period of modest economic recovery, which we currently appear to be approaching. Consequently, should conditions for a greater level of job growth materialise, it is likely that a suppressed level of housing growth will limit Ribble Valley's ability to embrace economic growth and take advantage of its benefits, because the declining working age population, currently being experienced, will not have been adequately reversed. As a result, by targeting to only meet what is an absolute minimum level of housing growth that is forecast to be necessary, the Core Strategy is neither positively prepared or effective or compliant with national planning policy.
- 2.6 A further consideration is the recently announced Preston and Lancashire City Deal. The City Deal aims to generate 20,000 new jobs - including 5,000 in the Lancashire Enterprise Zone - and 17,420 new homes and nearly £1bn in economic growth. Also planned are four new roads, a new motorway junction, improved public transport

links, new schools, health centres and parks and open spaces. Longridge falls within the North East Preston City Deal Development Zone (Zone 2) and proposals include a Public Transport Priority Corridor on the route of the B6244/B6243 between Longridge Town Centre and Preston City Centre.

- 2.7 The Core Strategy's housing and employment land requirements need to reflect the City Deal and LEP proposals to ensure that sufficient land is available, in the right locations, to take advantage of this significant investment. At this point in time, the Core Strategy does not appear to fully take into account how this economic strategy is reflected in its policies – or at least it is not made clear. As expressed above, Barratt Homes considers that the housing requirement of the Core Strategy needs to reflect the Policy On growth modelling of the supporting evidence base which plans for new job creation in the Enterprise Zones. Economic forecasting approach results in a housing requirement of anywhere between 315 and 559 dpa. It is therefore not unreasonable to conclude that a strategy based on fostering economic growth, which aligns with national planning policy, should see a housing requirement in excess of 300 dpa being delivered. By increasing the housing requirement to a figure in this region, the implications are minimal in terms of land-take, but it gives the Plan a greater prospect of helping to deliver a Policy On economic growth scenario, and the homes and population required to meet the projected needs that arise.
- 2.8 Turning to Barratt Homes' concern over the way in which the increased housing requirement is expressed, it is interesting to note the transformation that the policy wording has undertaken, through various iterations, since it was first drafted. The first draft of the Core Strategy set out a housing requirement of at least 200dpa to be delivered over the Plan period. The latest Modification now states the Core Strategy housing requirement as merely a target. To express the housing requirement in this way is contrary to both national planning policy and the RVBC's evidence base.
- 2.9 National planning policy requires Local Plans to be positively prepared, by seeking to meet objectively assessed needs, and be effective, by being deliverable¹. If the Core Strategy housing requirement is truly reflect of objectively assessed needs, then the requirement to meet those needs should be strongly expressed as a minimum growth target, not merely a target. The evidence base used by RVBC as a basis to justify the Core Strategy housing requirement, the HRU, very clearly expresses the 280 dpa figure as a minimum requirement in order to meet its jobs growth targets. Furthermore, the Inspector's letter to the Council of 31 January 2014 also makes very

¹ Paragraph 182, NPPF

clear that in order to comply with national planning policy and meet the tests of soundness **"a main modification increasing the level of housing growth to an annual average of at least 280 [dpa] is necessary"** (our emphasis). A housing requirement in excess of, or above, 300 dpa would be aligned with the Inspector's recommendations and go further to aligning with the Policy On economic growth scenarios.

- 2.10 Set against the Government's very clear aim to "boost significantly the supply of housing"² it is clearly necessary to express any Local Plan housing requirement as a minimum growth target, or alternatively set the requirement higher in the first instance in order to increase the prospects of meeting development needs, unless it is possible to demonstrate that there would be adverse impacts from doing so. No such impacts have been demonstrated, as highlighted by the Inspector in his letter of 31 January 2014. The expression of the housing requirement as we advocate is essential for the Core Strategy to be sound.
- 2.11 On the basis of our comments set out above, Barratt Homes recommends that Key Statement H1 be modified to a) set a housing requirement at or in excess of 300 dpa and b) express this requirement as an 'at least' figure. This approach would mean that the Core Strategy will have increased prospects of meeting the objectively assessed needs of Ribble Valley.

Main Modification Ref: MM13

Paragraph 6.4

- 2.12 On behalf of Barratt Homes we object to the proposed modification to remove reference to figures being treated as minimum targets. This text should be reinstated into the Core Strategy as stated by the Inspector in his letter of 31 January 2014.
- 2.13 We object to the retained reference in paragraph 6.4 of the intention to adopt a phased approach to the release of land, to be set out in a future DPD. Such an approach will restrain rather than boost housing delivery when there is no good reason for doing so. Indeed, the need for a phased approach is unsubstantiated by RVBC and is a matter of fundamental strategic importance that should be clearly set out within the Core Strategy as it pertains directly to the RVBC's ability to meet its housing requirements. There are examples of Local Plan Examination Inspectors

² Paragraph 47, NPPF

finding phasing policies contrary to the NPPF, such as in the case of the Rotherham Core Strategy. If the Council contends that a phased delivery of housing is required then it is suggested that the Examination should be reopened to fully test the evidence that such an approach is necessary, particularly as this is likely to demonstrate a need to deliver a figure in excess of the minimum of 280dpa in the early period of the plan. The need to boost housing delivery early in the Plan period could be regarded as justification for introducing a phased approach, providing this is targeted at the most sustainable settlements in the Borough, namely the principal towns, and delivery of housing at or in excess of 300 dpa.

Main Modification Ref: MM20

Policy DME5

- 2.14 Clarification is required as to what modifications are actually proposed to this policy through MM20 and MM32. MM20 proposes a much more onerous modification to the policy whereby RBVC will now 'require', as opposed to 'request', that major developments provide 10% of their predicted energy requirements from decentralised and renewable or low carbon sources. MM32, however, suggests that the requirement will be deleted from the policy.
- 2.15 On behalf of Barratt Homes we object to the proposed modification because of the more stringent requirement to deliver carbon reduction in this manner. RVBC will be aware of the Government's intention to reduce local standards for tackling climate change, instead favouring the more stringent regime in place through Building Regulations as the appropriate mechanism (Ministerial Statement by Stephen Williams MP of 13 March 2014). The Building Regulations regime also has the added benefit of regular/annual review rather than a vague and arbitrary target set at a particular point in time in a Development Plan Document, which is then fixed for the life of that particular plan. Barratt Homes is successfully delivering carbon reduction in its developments through the 'fabric first' approach, which has been accepted by numerous local planning authorities as having benefits over the introduction of renewable technologies. The benefits are as follows:
- CO₂ reductions are inherent for the design life of the building (approximately 60 years), whereas low and zero carbon technologies typically have a lifespan of 25 years;

- There are virtually no maintenance and/or replacement costs to maintain CO₂ reductions achieved through fabric first improvements, as opposed to low and zero carbon technologies;
- Low and zero carbon technologies cannot be relied upon to be replaced after a 25 year lifespan, and also have a diminishing performance over this 25 year period;
- Fabric improvements, and therefore CO₂ reductions, are apparent in 100% of the new built development, rather than a proportion of it, as required to meet policy requirements;
- There is no reliance on occupier's behaviour to ensure potential CO₂ reductions are actually achieved. Low and zero carbon technologies require education, awareness and behavioural changes that cannot be guaranteed; and
- The required behavioural change, maintenance and replacement at end-of-life is beyond the control of both the local planning authority and the developer, and the diminishing performance of the low and zero carbon technology is unavoidable. The situation could therefore arise whereby the technology is only present for 25 years and thereafter is discontinued.

2.16 Notwithstanding the above, at no point within the Core Strategy submission is the requirement to meet a specified level of energy usage or CO₂ reduction justified with robust evidence. Without such evidence the policy cannot be sound. Barratt Homes does not object to a more general policy approach of encouraging measures to make development more efficient in terms of energy usage and reduced CO₂ emissions in line with Building Regulations requirements, which the measures outlined above, as employed by Barratt Homes, would achieve.

2.17 The NPPF lends support to local planning authorities setting local requirements for a building's sustainability which are consistent with the Government's zero-carbon buildings policy and adopt nationally described standards³. National standards are set out in Building Regulations. The approach of policy DME5 is contrary to national planning policy in this respect, by proposing to adopt local standards that are not reflective of national standards and are otherwise unjustified through the provision of robust evidence. The policy is therefore unsound as proposed.

³ Paragraph 95, NPPF

Main Modification Refs: MM16, MM21 and MM25
Appendix 2, paragraph 15.2 and Key Statement DS1

- 2.18 Barratt Homes objects to the above modifications for reasons stated in previous representations relating to the quantum and distribution of housing.
- 2.19 First and foremost, the Core Strategy continues to express the residual number of dwellings required for each settlement, which can only be up-to-date for a very limited period of time. The table at paragraph 15.2 therefore has little relevance because it will be out-of-date upon adoption of the Plan.
- 2.20 Turning to MM21 and MM25, and the proposed replacement of Key Statement DS1, Barratt Homes does not object to the updated settlement hierarchy, which now includes the 'Tier 1 Villages', insofar as the settlements identified as Tier 1 Villages are arguably the most sustainable of the category described as 'Other Settlements' in the Submission Draft of the Core Strategy. Notwithstanding this, the proposed re-distribution of development from the Principal Town of Longridge to these less sustainable Tier 1 Villages remains unjustified and contrary to national planning policy.
- 2.21 The table at the end of DS1 sets out how and where the housing requirement will be delivered, including, once again, a residual figure for each settlement. Barratt Homes is disappointed to note that the Longridge adjustment remains; as previously highlighted in representations, and as stated above, the Longridge adjustment is not supported by robust evidence and we draw the Inspector's attention to those previous comments.
- 2.22 The Inspector's letter of 31 January 2014 clearly concurs with Barratt Homes' concerns, by stating

"I do not consider that the re-allocation of 200 homes throughout the 'Longridge adjustment' to the second tier villages is justified."

- 2.23 We are disappointed to note that despite the Inspector's concerns, and the concerns expressed at the Examination by a number of participants over the lack of robust evidence to support the Longridge adjustment, RVBC has failed to provide any further evidence at this stage in an attempt to counter those concerns. The only evidence that is provided comes in the form of the documents entitled 'RVBC Core Strategy EIP: Technical Note 2 – Technical Note regarding Longridge Adjustment' and 'Defining the

more sustainable settlements *and patterns of housing development*'. Neither of these documents provide anything new in terms of evidence to justify the principle of the adjustment; they instead focus on the relative redistribution.

- 2.24 First and foremost, the adjustment, and therefore the Core Strategy, is effectively saying that Longridge cannot accommodate the level of development that would be apportioned to the settlement without the adjustment; in other words, it is imposing a cap on development in Longridge. However, there is no evidence whatsoever of any unacceptable physical, environmental or social implications of proceeding without the adjustment. RVBC's Technical Note 2 even confirms that **"200 units is considered to be a relatively small number"**⁴. The result is that the policy is not justified and contrary to the direction of national planning policy, which is to boost significantly the supply of housing and to create sustainable communities.
- 2.25 The result of the adjustment is that 200 dwellings are apportioned to settlements that are markedly less sustainable than Longridge. There is no evidence to demonstrate that such a need exists within these settlements, over and above the existing level of commitments. It is simply poor plan-making to direct development that should be meeting the needs of the principal, most-sustainable settlements, to those settlements within the Borough that are less sustainable and have no evidenced need for the development.
- 2.26 Barratt Homes' strong objection therefore remains and we consider that the Core Strategy cannot be sound on this basis. If RVBC is to pursue this policy in the face of both the Inspector's comments and the matters raised above, then it is imperative that the Examination is re-opened for Hearing Sessions to debate this issue and to interrogate any evidence that RVBC is relying on as justification for the policy.

Main Modification Ref: MM26

After paragraph 1.4

- 2.27 Barratt Homes supports, in principle, the proposed modification to include new text within the Core Strategy that commits RVBC to reviewing the Plan's housing requirement within 5 years of adoption. However, the test of a sound Local Plan is that its evidence base, and resultant policies, are sufficiently robust and flexible to withstanding changing circumstances over the lifetime of the Plan. It is sound plan-

⁴ Page 3 (no paragraph numbers provided) - RVBC Core Strategy EIP: Technical Note 2 – Technical Note regarding Longridge Adjustment

making to regularly review the performance of policies, nevertheless, if it should emerge that a review is needed after only 5 years of the Plan period, then the Plan should not have been found sound in the first place. In order to ensure that the housing requirement is sufficient to deliver in varying economic circumstances throughout the lifetime of the Plan, it is essential that the requirement is ambitious and distributes development where it can be delivered most, such as within the most sustainable principal settlements, such as Longridge, and that a range of sites are identified to ensure choice and competition in the market place for land.

- 2.28 The need for such early review can therefore be avoided by planning more positively for growth in jobs and housing through the adoption of a higher overall housing requirement. If justified, a phased approach to increased levels of housing delivery early in the Plan period, in the principal towns where the required infrastructure already exists, could act as a catalyst to ensuring that the Core Strategy is delivering sufficient development to meet the Borough's needs. A further point of concern is that a review so early would not necessarily allow sufficient time for the Allocations DPD to make an impact on delivery.

Main Modification Ref: MM32

Policy DME5 Paragraph 2

- 2.29 See our comments under MM20 above in relation to the clarification that has sought over the proposed modifications to this policy.
- 2.30 Barratt Homes supports the proposed modification to delete the requirement for 10% of predicted energy requirements of development to come from decentralised and renewable or low carbon sources and we suggest that the whole basis and justification for the policy needs to be reviewed to ensure compliance with the NPPF⁵, in order to align with nationally described standards, not local standards that, in this case, lack clear justification.

⁵ Paragraph 95, NPPF

Main Modification Ref: MM47**Policy DMG1: General Considerations**

- 2.31 Barratt Homes objects to the proposed amendment to policy DGM1. The proposed modification sees the introduction of a new sentence stating that *"Previously developed sites should always be used instead of Greenfield sites where possible."*
- 2.32 The intention of the new policy wording appears to be a requirement to prioritise the use of brownfield sites over Greenfield sites. This is contrary to the NPPF, which does not support such a sequential approach to the release of land for development. The approach of the NPPF is to encourage the effective use of previously developed land⁶ not prioritise it. The NPPG highlights that encouragement for the effective use of previously developed land should come from reducing the burdens of planning obligations, as opposed to prioritising the development of previously development land over Greenfield land⁷. The key message entrenched throughout the NPPF is the delivery of sustainable development, as the 'golden thread' running through both plan-making and decision-taking⁸, and the creation of sustainable, inclusive and mixed communities⁹; this is the priority that should be embedded within the delivery of development needs, not the prioritisation of previously developed land which is not necessarily the most sustainable strategy to pursue.
- 2.33 The proposed modification, and resultant policy, is therefore unsound on the basis that it is contrary to national policy and will most likely restrain housing supply as opposed to boosting it.

⁶ Paragraph 111, NPPF

⁷ ID 10-025-20140306, NPPG

⁸ Paragraph 14, NPPF

⁹ Paragraph 50, NPPF

3.0 Response to Further Published Information

- 3.1 Alongside the proposed Main Modification to the Core Strategy, RVBC has published additional documents that form part of the evidence base of the Plan.

Housing Land Availability Schedule 2014

- 3.2 We have undertaken a detailed review the Housing Land Availability Schedule 2014 ("HLAS"). The most concerning outcome of our assessment of the document is the errors it contains and unrealistic assumptions it makes over the delivery of housing, leading to the conclusion that upon adoption of the Core Strategy, RVBC will remain in a position that it cannot demonstrate a five year supply of housing. Our initial findings upon reviewing the HLAS lead to the conclusion that the level of supply is, at best, 4.1 years.
- 3.3 This is a conservative assessment because it assumes some delivery on the Core Strategy Strategic Site at Standen. RVBC granted outline planning permission for the development of the Strategic Site in April 2014; however, the status of the planning permission is currently uncertain as a result of a legal challenge to RVBC's decision. This factor will delay further the Strategic Site coming forward for development. Allied to this is the significant infrastructure required before development can commence, the fact there is currently no preferred developer appointed and the fact that the lengthy exercise of obtaining reserved matters approval and discharge of pre-commencement conditions is yet to begin. For the HLAS to conclude that 300 dwellings will be delivered from the Strategic Site within the next five years is therefore wildly optimistic. We consider that a realistic lead-in time to development, on the basis of the outstanding issues highlighted above, is in the region of three years. With assumed delivery at circa 50 dpa, only 100 dwellings are likely to be completed at this site in the next 5 year period.
- 3.4 The other major site identified within the supply, Land to the South and West of Barrow and West of Whalley Road, Barrow, was granted planning permission at appeal in February 2014, in outline form, for up to 504 dwellings. As with the Strategic Site, the HLAS assumes delivery of 300 dwellings over the next five years. We similarly consider this assumption not to be soundly based and, again, optimistic to say the least. The site has only just been placed on the market and the process of a developer, or developers, signing up to bring the site forward will take some time. Add to this the period of obtaining reserved matters approval and the fact that

competing schemes are also coming forward in this Tier 1 village¹⁰, and the delivery of the necessary infrastructure to serve the development. We consider the lead-in time to development commencing on this site is likely to be in the region of 2.5 years, meaning that a circa 125 dwellings would be delivered within the next five year period.

- 3.5 The estimations above are based on experience of the local market. Barratt Homes has significant experience of development within Ribble Valley and is currently active in developing an existing site at Henthorne Road, Clitheroe, which is shared with developers Taylor Wimpey. This site is within the core urban area of the principal settlement within Ribble Valley and is experiencing sales rates of approximately 2.48 units per month, equating to approximately 30 units per annum. Given the location of this outlet, within the largest settlement in Ribble Valley, and the fact that it involves two of the largest developers in the Country, it is considered that the site is a useful benchmark of a committed site delivering at the optimum level.
- 3.6 This evidence suggests that the assumptions in the HLAS are not reliable. Notwithstanding the lengthy lead-in time stemming from the site preparatory works, infrastructure works, obtaining of reserved matters and subsequent satisfaction of pre-commencement conditions, these two sites would need to deliver 60 dwellings per annum to be delivered within the next five years. In addition to the physical requirement of needing two developers active on site, there is a requirement for a high level of latent demand arising from a significant level of local population within the vicinity of the site, as well as a wide demographic profile and strong developer interest in the site. Given the scale of Barrow as a settlement, there must be considerable doubt as to the level of demand for the development in order to justify the expected level of completions set out in the HLAS.
- 3.7 Our initial findings discount in the region of 550 dwellings from the HLAS supply, due to a combination of assumptions; including that some sites are expected to deliver in the next five years despite standing dormant with extant planning permissions for some time, a number of historic and duplicate planning permissions are included within the supply, and the lead-in times for the delivery of large sites, as described above, are unrealistic and unachievable.

¹⁰ MM21 and MM25

Consequences

- 3.8 Having regard to the above, and the general view of the development industry that the Standen site is unlikely to be delivered in full over the Plan period, there needs to be a further, wider review of the Core Strategy's approach to delivering its housing requirement, including the consideration of alternative, additional Strategy Sites.
- 3.9 This matter was discussed at the Examination Hearing Sessions and the Inspector invited submissions from participants of details of potential further strategic sites. On behalf of Barratt Homes we placed before the Inspector details of its site at Higgins Brook, north of the principal settlement of Longridge, including a site location plan and illustrative masterplan. The first phase of this site is currently the subject of a detailed planning application, under consideration by RVBC, and the remaining land offers significantly more deliverable benefits that will soon be presented in an outline planning application. The scale of this site, for circa 500 dwellings, a new community cricket ground and primary school, is potentially strategic in nature and, more importantly, Barratt Homes is ready to deliver housing on this site. We provide further comments on this recommendation below (section 4.0).
- 3.10 The inclusion of additional strategic sites will ensure that the Core Strategy can realistically deliver its housing requirement. The evidence currently available, notably the HLAS, does not provide the confidence that this can be achieved, calling into question the effectiveness of the Plan and, consequently, its soundness.

4.0 Recommendation for new Strategic Site at Longridge

- 4.1 On behalf of Barratt Homes we have expressed a concern within these representations, and on previous occasions at the Examination, that the proposed housing requirement set out in the Core Strategy is likely to be insufficient to meet the full objectively assessed needs of the Borough with particular reference to meeting economic growth strategies that feed into and are reliant upon the Core Strategy. We have also highlighted the fragilities of the proposal to allocated a single, large-scale strategic site, in the form of Standen, not only as a result of the doubts that exist over the delivery of the site in full within the Plan period, but also on the basis of the fact that Standen operates in a single market area requiring substantial sales in a relatively short time period, where competition already exists in the form of other sites that are coming forward.
- 4.2 Barratt Homes considers it appropriate, to ensure that the Core Strategy's housing requirement will be met, to identify additional strategic sites in alternative sustainable locations to Standen. The town of Longridge is clearly only second to Clitheroe in terms of its scale and the extent of infrastructure, services and facilities required to accommodate strategic growth. Longridge has experienced only very limited growth in recent years, reflected by the worrying statistic that less than 10 new affordable homes have been delivered in the town in the last 10 years.
- 4.3 Barratt Homes has control of circa 23.7 hectares of land to the North of Longridge ("the Site"), sufficient to provide in the region of 500 homes, a new cricket ground for Longridge Cricket Club and a new primary school, which can be delivered in full over the Plan period. The Site was included in RVBC's 2013 SHLAA Update and categorised as deliverable with an excellent score against the SHLAA's Sustainability Scoring Criteria; scoring 98 out of a possible 110, the highest of any site in Longridge. The conclusions of the SHLAA reflect the highly sustainable location of the Site, which provides a number of opportunities to link pedestrian and cycle routes to the town centre, the local supermarket and a range of community facilities and employment opportunities.
- 4.4 Both within the developed area of the Site and land to the North provide excellent opportunities to deliver accessible open space and leisure opportunities. In addition, the land in question, and green corridors throughout the Site, would deliver ecological enhancement measures to deliver environmental benefits.
- 4.5 The existing cricket ground at Longridge is in need of improvements and the proposed development of Higgins Brook brings with it an opportunity to provide an

entirely new facility for the Cricket Club, which meets English Cricket Board approved standards in terms of dimensions and facilities; including a new pavilion practice nets, stores and car park, all set within strong landscape protection. This facilities would be an excellent benefit to the town of Longridge, the local community and the of course the Cricket Club itself, which already has a strong membership base.

- 4.6 Discussions with Lancashire County Education Authority have revealed the need to increase primary school capacity in Longridge should these development proposals come forward. The Site at Higgins Brook provides an opportunity to provide an entirely new primary school to meet these and future requirements. This is yet another excellent benefit that the development would bring, which is clearly preferable to the situation whereby existing schools would be stretched to capacity with the potential need to provide temporary school accommodation until such time that expansion could be achieved.
- 4.7 A further benefit of a development of this scale is the delivery of in the region of 150 much needed affordable homes, including homes for the elderly, in a location where affordable housing has historically not been delivered.
- 4.8 The development of Barratt Homes' Longridge Site would bring economic benefits to the town and wider area. Full time construction jobs over a period of approximately 10 years would be provided, including potential supply chain employment as a result of the construction process. Annual household spending would increase in the local economy, bringing with it the potential for further job creation as a result of the increased local expenditure. Local leisure and community groups would also see membership numbers increase, to the benefit of their longevity and economic standing.
- 4.9 The Site is not constrained by any landscape, ecological or heritage designations, and the developable area of the Site has been carefully considered through landscape and visual assessment at an early stage, ensuring that existing strong boundary lines are retained and enhanced by the development proposals, thereby reducing its impact upon the surrounding countryside.
- 4.10 The enclosed illustrative masterplan (Appendix 1) shows the results of a well-planned urban-design approach to the development of the Site. The illustrative layout applies green infrastructure to the more sensitive development extremities, with increasing density to the areas of the Site that are more related to the existing settlement. Full use is made of existing points of potential non-vehicular access and a logical and

attractive green network of footpaths and cycle ways link together the various character areas of the Site.

- 4.11 Access to the Site via Chipping Lane to the east requires only limited off-site improvement works, thereby limiting infrastructure delivery requirements before development can commence. As stated above, a detailed planning application has already been submitted to RVBC for the first phase (106 units) of the development. The important asset of this Site is the fact that construction work could commence, with the necessary consents in place, in a relatively short period of time, meaning that it can be delivered in full within the Plan period. These are all important credentials for a strategic site and clearly justify the allocation of Higgins Brook as such in this instance.
- 4.12 Should it not be deemed necessary or desirable for the Inspector to recommend or explore the allocation for further strategic sites within the Core Strategy, then consideration should be given to designating a broad location for strategic development on the Key Diagram for the area north of Longridge.
- 4.13 We trust that these submissions will be given detailed consideration in the Inspector's on-going assessment of the soundness of the Core Strategy.

Legend

- Proposed Cricket Pitch
- Proposed School
- Proposed Primary School
- Proposed Recreation Area
- Proposed Green Space
- Proposed Pathway
- Proposed Road
- Proposed Footpath
- Proposed Cycleway
- Proposed Water Feature
- Proposed Building
- Proposed Tree
- Proposed Fencing
- Proposed Boundary



