

RIBBLE VALLEY BOROUGH COUNCIL

CORE STRATEGY 2008 – 2012 - A LOCAL PLAN FOR RIBBLE VALLEY

EXAMINATION IN PUBLIC

**COUNCIL'S RESPONSE TO INSPECTOR'S NOTE ON INITIAL QUESTIONS,
COMMENTS AND CONCERNS**

This note provides the Council's response to the issues raised by the Inspector.

LEGAL COMPLIANCE

Duty to Co-operate

Points 1-4

The Council has prepared a supporting note attached to this response. Further detailed information and analysis can be provided as appropriate or required.

Local Development Scheme

Points 5-8

The Council has revised the Local Development Scheme to incorporate more detail from the Council's previously published programmes, to update the timeframe and to refresh the statement to incorporate more recent issues. The LDS revision is attached as a separate document.

Information is included in the LDS regarding the Housing and Economic DPD which is intended to deal with more detailed policy matters but specifically the allocation of both housing and employment land. The Council recognises that this document is significant in terms of delivery of the Core Strategy. It is the vehicle through which the scale of growth at the settlements, including the review of settlement boundaries would be undertaken. Town centre policies, designations and potential development sites would also be determined through this document.

Mindful of the proposals and changes promoted through the National Planning Policy Framework (NPPF), the Council will need to consider whether this proposed DPD should be modified to deal with the broader allocation matters, including public open space that has been identified by the Council as a matter warranting further consideration by way of a new DPD.

It is recognised that the timing of the Council's programme has crossed with the introduction of NPPF and the opportunity to provide a revised Local Plan approach has yet to be considered. In effect there is a need for the Council to consider the production of what some local authorities are progressing under NPPF, effectively as a 'Part 2' Local Plan to implement in detail the strategic policy context of the Core Strategy. As yet, Members have not had the opportunity to review this revised approach within the timeframe, and stages of delivering its Core Strategy as NPPF has been introduced. Members have viewed as a priority the need to have in place the strategic framework that the Core Strategy is intended to provide given the development pressures that are arising in the borough.

SOUNDNESS

The Council is pleased to set out below the response to the queries and concerns raised in the order of the Inspector's note.

General

9. ***The CS contains a number of 'Key Statements'. Is there any particular reason why they are not referred to as Policies, as is common practice? This is not necessarily a problem, but I do need to be clear about their status. Does the Council intend that they should be treated as strategic development plan policies?***

These are in effect strategic development plan policies. The referencing has been the result of successive iterations of the Core Strategy, however, there is absolutely no reason why they should not be referred to as policies.

SPATIAL STRATEGY

10. ***Clarification: As I understand it, the spatial strategy is based on a two-tier hierarchy. This comprises (i) the key service centres of Clitheroe, Longridge and Whalley, and (ii) elsewhere. Is that right?***

The strategy is based on a two-tier hierarchy in relation to settlements where development is focused, namely the key service centres as you identify (or larger settlements) Clitheroe, Longridge and Whalley and other settlements.

11. ***Within the hierarchy, which settlements are in the lower tier? Does the CS list them? Are there other settlements (small villages or hamlets, perhaps) to which the CS directs no development at all (ie is there really a third tier in the hierarchy)? On this point, I note the rural settlements without development boundaries in the Districtwide Local Plan listed in Section 5 of the Settlement Hierarchy document. Does the CS explain all of this explicitly enough so as to be effective?***

The other settlements are derived from the list of identified settlements in the Districtwide Local Plan. The list of the settlements is set out in the table below:

Barrow	Downham	Mellor Brook	Sawley
Billington	Dunsop Bridge	Newton	Slaidburn
Bolton by Bowland	Gisburn	Osbaldeston	Tosside
Brockhall	Grindleton	Pendleton	Waddington
Calderstones	Holden	Read & Simonstone	West Bradford
Chatburn	Hurst Green	Ribchester	Wilpshire
Chipping	Langho	Rimington	Wiswell
Copster Green	Mellor	Sabden	<u>Worston</u>

It is agreed that it would be clearer if these were identified within the Core Strategy. In terms of where development is directed, the approach is to direct growth to those locations. These will be the locations where the Council will seek to allocate development. Outside these locations development is restricted through the development management policies (in particular DMG 1, 2 & 3, DMH 3 & 4), but as an approach the strategy does not preclude development outright in other locations.

Additional clarification was intended through the inclusion of the list of settlements as an intended change. Proposed Change no. 84 in the schedule of Identified Changes (Sub 1.2) sought to rectify this although it appears the actual wording of the change has not been included in the composite version of the Core Strategy (sub 1.1). and this needs to be corrected. It is agreed that the Core Strategy would be improved with a clearer statement on the hierarchy and a statement can be provided if considered appropriate.

- 12. *The Settlement Hierarchy document, adopted by the Council in December 2008, assesses the services present in each settlement. It identifies Clitheroe, Longridge and Whalley as the three key centres. However, in relation to the large group of settlements of an 'intermediate' type, it says that it is difficult to definitely distinguish, using the methodology employed, those settlements which could act as more local service centres in terms of future planning policy. It says it is possible that more detailed analysis may show which are best to act as local service centres. Has such detailed analysis been undertaken? Is the justification for the proposed settlement hierarchy sufficiently robust?***

Detailed analysis has not been undertaken at this stage. This was envisaged as part of the work to support allocation of development, where in the scale of growth to be planned for would be determined by way of a relationship to both scale and character as indicated in the Core Strategy, as well as the extent to which the level of services would support any additional growth. It is through the Housing and Economic Development DPD that the detailed scale and patterns of growth through allocations and review of settlement boundaries is intended to be undertaken.

A number of elements relate to the settlement hierarchy, which significantly reflects the strongly expressed desire when the strategy was developed to achieve a fair distribution of new development, especially in terms of housing growth and overall patterns of the distribution of the requirement, coupled with a desire to ensure that rural settlements were given an opportunity for some development to take place. These were reflected in the consultation responses and through the public and community engagement work the Council undertook, where a strong view that villages should not be overly restricted was demonstrated. Some growth was seen as vital to sustaining the future of the rural communities and the strategy was shaped to help facilitate this.

Additional clarification could be provided to enhance the justification and a statement can be produced if considered appropriate.

- 13. *How does the spatial strategy take account of the Green Belt, Area of Outstanding Natural Beauty, and the flood risk sequential test? How does the CS steer the approach to allocating sites in relation to these factors?***

The distribution model establishes the broad range of development. The Core Strategy establishes what the AONB and greenbelt constraints are, these will be taken into account when dealing with the appropriate scale, extent and form of sites to be allocated. Similarly such issues as natural and built heritage assets, for example Conservation Areas and open spaces would be taken in to account in a similar manner. The key development plan policies relating to the AONB and

Greenbelt together with other constraints are set out as part of the strategic framework of the document. The Housing and Economic DPD will then be used to implement that policy as indicated above. The housing model makes a modelled assumption that over the plan period at the identified settlements it could be anticipated that some 35 dwellings on average will come forward. It is important to bear in mind that this is an average, some settlements have accommodated more, others due to their recognised constraints may accommodate less. The Council will use the Core Strategy framework to set out the pattern and scale of growth through the Housing and Economic DPD. The Council has established a quarterly monitoring framework to inform decisions and will apply the policies of the Core Strategy, in particular the Development Management suite of policies when determining applications. This approach also introduces, we believe in accord with NPPF, an approach that allows the flexibility for sustainable development to be brought forward in response to changing circumstances.

KEY DIAGRAM

14. ***On the last page, the Key Diagram is given a very low profile in the CS. It would be much better to have it earlier on. Perhaps it should be within the development strategy section?***

There is no reason in particular for the key diagram to be placed at the end of the strategy. It could be placed in the development strategy section as suggested, as it does provide the strategic spatial picture that the Core Strategy is framed around.

15. ***The Key Diagram reveals very little about the CS intentions for growth. It notably omits all of the settlements other than the three key service centres. It gives no clear indication of where new housing and employment development is planned, save for showing the location of the site at Standen, Barrow Business Park and Samlesbury Enterprise Zone. While these are the most strategic sites, the Diagram does not help to explain what level of growth is anticipated either in them or around the wider borough.***

Our approach for the key diagram is that it identifies the key strategic elements, it does include our strategic development locations and it is agreed that it would be useful to give the diagram more presence in the Core Strategy. It can be best placed to identify the 'other settlements' and could be annotated to show that the key proportions of development anticipated. The Council would not anticipate those being shown against settlements other than Clitheroe, Longridge and Whalley as the larger settlements. The amount of development in detail at the other settlements will be identified in the HEDP in the Council's approach.

HOUSING **Evidence base**

16. ***The CS appears to be underpinned by the Strategic Housing Market Assessment (SHMA) of December 2008 and the Strategic Housing Land Availability Assessment (SHLAA) of November 2009. Neither is particularly recent.***

Inspector's comment noted. The Council considers they provide a sound basis for its housing policies. The CS includes a commitment to update the SHMA and updating Housing Needs Survey information (para's 6.5, 6.6). In addition the Core Strategy's approach to housing is informed also by more recent reports such as NLP report (July 2011) and the recent refresh of the Pennine Lancashire Housing Strategy 2009-2029 (2011).

17. ***As I understand it, the Housing Requirement Report by NLP, dated July 2011, effectively updates the SHMA in relation to the overall level of need for housing from 2008 to 2028. It concludes that this should be in the range of between 190 and 220 dwellings per annum.***

The Inspector's understanding is correct.

18. ***However, paragraph 159 of the NPPF says that SHMAs should cover more than just the overall scale of housing required. In particular, the mix of housing and the range of tenures likely to be needed should be identified, and the need for affordable housing should be addressed. Does the Housing Requirement Report by NLP provide robust evidence in these respects, or are there gaps in up to date evidence? I am concerned that the latter may be the case.***

Whilst the NLP report specifically addresses the issue of the overall housing requirement, the Council is aware of the requirements of para. 159 of the NPPF. Although the NPPF was published recently (March 2012), similar requirements were contained in the former PPS3 that has been a guiding document for the preparation for the Core Strategy Housing policies. These matters were considered in SHMA and more recent documents such as the Affordable Housing Memorandum of Understanding (July 2009); Addressing Housing Need in Ribble Valley (2011) and the Pennine Lancashire Housing Strategy 2009-2029 Refresh (2011). These latter two documents confirm that the priorities for Ribble Valley remain relevant as the delivery of affordable housing and the provision of housing for the elderly. The Council does not consider that there are gaps in its evidence base in these respects.

19. ***The SHLAA identifies 138ha of deliverable land for housing, which it says equates to 5441 dwellings. It concludes (against the RS¹ annual average) that there is 34 years worth of deliverable land for housing. But the AMR 2011 says there is only a 2.9 year supply. Which is it?***

AMR figures only include a 5 year supply of sites with planning permission as per the Housing land availability schedule. The SHLAA figures include sites which have potential for housing and are considered deliverable in terms of the SHLAA methodology but the SHLAA does not include sites which have unimplemented planning permissions or were under construction (5.2 of the SHLAA).

An update of the 5-year housing land availability position (i.e. sites with planning permission), undertaken at October 2012 show that there is supply of 1318 dwellings with planning permission (excluding completions). This equates, applying the Council's methodology to a 6 and 5yr supply respectively against the RS requirement (161pa) and the proposed Core Strategy (200 pa). A copy of the latest Housing Land Availability (HLA) report has been placed in the document library (Library reference: Post 3.5) and a copy included with this response.

20. ***From the AMR 2011, it is clear that housing completions have been significantly below the RS target since its adoption in 2008. Indeed, neither the RS target, nor the 'adjusted figures' shown on Graph 7 of the AMR, have been met since 2005-2006. In terms of paragraph 47 of the NPPF, does this amount to 'persistent under delivery'?***

The latest HLA update (October 2012) shows that 1237 dwellings were completed between April 2003 and October 2012. This remains below the RSS target and the target of 200 that has been included in the Core Strategy.

The Council recognises that this amounts to "persistent under delivery" in terms of the NPPF para 47 and accordingly it currently factors in the 20% buffer into the supply calculations. (see library document Post 3.5)

21. ***As I understand it, in identifying sites, the SHLAA methodology includes sites: identified by officers in the settlement audit (Oct 2006); promoted by developers/landowners as part of LDF process (Feb 2007); put forward through a call for sites (March 2008); refused planning permission in the last 3 years (which I take to mean 2007 – 2009 inclusive) on grounds of prematurity; and those put forward from discussions with Development Control officers. The passage of time since some of this evidence was gathered is a concern.***

The Inspector's concern is noted. The SHLAA has not been updated since it was published. However the Council considers that the ability to identify sufficient land to meet housing requirements is not an issue. Experience is showing that sites are coming forward for residential development as evidenced by regular monitoring. Additional sites outside the SHLAA have also come forward. A call for sites to be undertaken as part of the preliminary work on the Housing and Economic Development DPD will provide additional evidence to update the SHLAA.

22. ***For clarification: Does the SHLAA include sites which have an unimplemented planning permission?***

The SHLAA does not include sites which have unimplemented planning permissions or were under construction as stated at 5.2 of the SHLAA

23. ***The SHLAA considers economic viability under the 'achievability' heading. It uses information about house prices and build costs in October/November 2008. I am concerned that this may no longer be reliable.***

Concern noted.

24. ***In addition, in considering development costs, the viability assessment takes account of the cost of providing affordable housing on sites over 15 dwellings, as that was the national threshold at the time. But I am not clear what level of affordable housing provision was assumed. In any event, Key Statement H3 of the CS seeks 30% affordable housing on sites of 10 or more in Clitheroe and Longridge, and on sites of 5 or more elsewhere. It also seeks an element of market housing for elderly groups, which may affect viability.***

The threshold for affordable housing used in the SHLAA was 15 dwellings (page 38, paragraph 8.85 & footnote 42 of the SHLAA). The viability assessment was undertaken by the HEMP (Housing and Employment Market Partnership) Group as valuation experts. At the time the viability assessments were undertaken, the

Council negotiated for the provision of affordable housing on a site by site basis. The provision of affordable housing was factored in to the abnormal development costs in assessing viability.

- 25. *Has the effect of the policies proposed in the CS (the 'policy on' scenario) been taken into account in considering the viability of sites in the SHLAA? Does the SHMA test viability with the CS thresholds?***

The affordable housing requirements set out in H3 have not been the subject of separate viability testing. The Council has in practice implemented these requirements consistently since July 2009 when they were first incorporated in the Affordable Housing Memorandum of Understanding (see also response to question 38 below). Reviews of permissions granted for housing demonstrates that in most cases, these requirements are met, demonstrating the viability of the requirements. In cases where they are not, lower requirements have been supported by specific viability assessments relating to the particular site.

Spatial distribution of housing

- 26. *Of the 4,000 houses planned for over the plan period, the strategic site at Standen, close to the edge of Clitheroe, would accommodate 1,040. A further 126 homes would be accommodated within Clitheroe itself. Why has this concentrated approach been taken? Do the sustainability credentials of Clitheroe, compared to the other two key service centres, warrant it? Has the Council considered a more even spread between the three key service centres?***

The spatial distribution of housing including the identification of the strategic site at Standen is the outcome of a due plan preparation process which has considered other options and been subject to Sustainability Appraisal. The development strategy represents a distribution of development that primarily accords with population distribution and representing a fair and equal distribution in response to matters raised at the regulation 25 consultation. The majority of the new development (2880 dwellings) is to be located in the three main settlements of Clitheroe. The 2880 dwellings are apportioned to these three settlements in relation to their percentage share of the total population of the three settlements. Clitheroe, as the largest settlement, has the largest share. As stated at paragraph 4.9, the strategic site at Standen is considered to be well related to the settlement of Clitheroe. It's potential for housing is therefore considered to contribute to the requirement for Clitheroe based on the population distribution model for the three main settlements.

Appendix 2 of the Core Strategy sets out the basis for the housing distribution.

- 27. *The table at paragraph 4.11 of the CS indicates that 583 of the 4,000 additional homes would be in 'other settlements'. Does this mean all other settlements? If not, which are to be excluded?***

Paragraph 4.11 refers to Appendix 2 of the Core Strategy which states that the housing distribution model provides for 1120 out of a total of 4000 dwellings in "other settlements." This strand of the strategy recognises that some limited development can take place in settlements outside the main three settlements of the borough, which is a continuation of previous planning policy contained in the Ribble Valley Local plan and the former Structure Plans.

Appendix 2, footnote 20 includes a figure of 32 in brackets. To clarify, there are actually 32 specific “other settlements” to which this figure of 1120 applies (giving the average of 35 dwellings per settlement as referred to at footnote 20 and in question 28 below). The 32 settlements derive from the settlement hierarchy and are considered appropriate to accommodate an element of housing to contribute to the overall housing requirement. Following consultation at the regulation 19 Publication stage the Council recognised that the clarity of the plan could be improved by explaining which are the 32 “other settlements”. Proposed Change no. 84 in the schedule of Identified Changes (Sub 1.2) sought to rectify this although it appears the actual wording of the change has not been included in the composite version of the Core Strategy (sub 1.1). The Council is willing to provide this wording to add to the clarity of the plan.

- 28. The level of new housing development at each of the ‘other settlements’ is unclear to me. I note the formula at paragraph 15.1. Is it the case that:**
- a. an average of 35 dwellings per settlement has been settled on; and**
 - b. that the total arrived at from this average (being 1,120) would be distributed proportionately between the ‘other settlements’ based on their present population size?**

If so, why has the 35 dwelling figure been chosen? Why has current population size been a decisive factor in determining the spatial distribution between the ‘other settlements’? Has their relative sustainability credentials been taken into account? In short, what is the justification for the approach taken here?

The Council confirm that an average of 35 dwellings per 32 settlements for the purposes of calculating housing provision is correct.

The principal of locating some development in “other settlements” was included in Option A and B of alternative options which were considered at previous stages in the formulation of the plan. This would enable development to be spread across the Borough allowing for small scale development within the Borough’s smaller settlements, creating opportunities for social and economic preservation and development for future generations. Option A allowed for 10% of dwellings in such settlements, and option B 20%. The submitted strategy is a hybrid of Options B and D (as described at sections 4.3 - 4.11 of sub 1.1). Based on an annual requirement of 161 dwellings per year (derived from RSS) this amounted to an average of about 20 dwellings per settlement. However this has now been updated to take account of the revised overall housing figure of 200 dwellings per year and completions since 2008. The latter show that a target of 20 dwelling per other settlement has already been achieved in the early years of the plan. In order to facilitate smaller scale development as per DS1 in the remainder of the plan period the figure of 35 dwellings per other settlement has been chosen which is considered achievable and would not jeopardise the overall plan strategy.

Policy DS1 states that “*in addition to the strategic site at Standen, 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 the development can be accommodated within the local area. Specific allocations will be made through the preparation of separate allocations DPD.*” Housing Land Availability information as at July 2012 (incorporated in the table at 15.2 as per Identified Change 85) shows that of this 1120 total, the residual requirement for other settlements is 583 over the remainder of the plan period. The

Council is satisfied that sufficient land e.g. as identified in the SHLAA can be identified to meet the requirement.

- 29. *As things stand at present, I am concerned that the spatial distribution among the 'other settlements' may not be sufficiently clear so as to be effective. It is difficult to see how the CS gives adequate steer to the allocation of sites for housing.***

The Council considers that the spatial distribution is clear, appropriate and will provide an effective framework for site allocation and development management processes.

HOUSING TYPES AND MIX

- 30. *Key Statement H2 relies on the SHMA to determine the mix of housing. Why does it not specifically set out the mix of housing types anticipated over the plan period? Is relying on the SHMA in this way effective, especially given that it was produced some time ago?***

The basis for identifying the mix of house types required over the plan period is the SHMA. We do however have regular updates in terms of affordable needs identified through Parish needs and assessments, which informs detailed information implementation on a site by site basis. The principle purpose of Policy H2 in our strategy is to confirm what basis the need for differing house types will be established. The key to this of course is ensuring that the SHMA is updated, together with other supporting evidence on local needs and monitoring of housing stock. We are currently programmed to update the SHMA in 2013, this will benefit from the availability of the latest census data in particular, together with other monitoring and marketing information. Subject to resources being available, an earlier update could be achieved, but should in any event await the publication of the census in the Council's view. The strategic housing team maintain other evidence in relation to needs through the Parish surveys, waiting lists, registration events, and partnership working with the registered providers. For broader market needs, the Council recognises that developments need to reflect viable, marketable sites which the Council considers is a matter for developers and the market, albeit a matter that can be kept under review through the Council's monitoring and updates of the SHMA.

- 31. *This Key Statement relates to determining planning applications. How does the CS provide a steer concerning the mix of housing to come forward through site allocations?***

The Council's approach is to establish the headline strategic framework for deciding applications including the mix of housing coming forward and that this is to be informed by the relevant SHMA at the time. This allows the principle of the policy approach to be established and the flexibility then for the detailed consideration to be based on the relevant data appropriate to the circumstances without the Core Strategy being prescriptive in detail. Detailed site allocations, including any mix of house types will be delivered through the Housing and Economic DPD. In practice it is likely that the Council would look to establish the nature of house types and tenure mix in relation to identified needs (by way of the relevant SHMA, Parish surveys, waiting lists and monitoring of delivery) and in accord with the Council's requirements to meet needs for older people but would wish to be flexible in terms of the wider

market mix on sites. The Council also considers that this will be important to allow design considerations to be taken into account and schemes to reflect the characteristics of the particular site and its location.

THE STANDEN SITE

- 32. *The site at Standen is central to the delivery of the CS. It would accommodate roughly one third of the housing planned for, B1 uses, community and open space/recreational uses, among other things.***

Response not required

- 33. *Does the Council know whether a primary school will be needed on the site? This seems rather fundamental to me. If one will be needed, the CS should plan for its delivery. This is also likely to have implications for the level of housing and employment development the site can accommodate. In the absence of certainty about the need or otherwise for a school, how robust are the housing figures given for the site?***

A site for a school has been identified in the Standen proposal that has been developed alongside the preparation of the Core Strategy. Consultation with the landowner, Lancashire County Council and the Council has been ongoing during the development of the proposal that has now been submitted as a planning application (03/2012/0942). The proposal was the subject of an EIA screening request early in 2011 and a full EIA report has been submitted with the application together with an extensive series of supporting documents.

The Standen proposal has been the subject of consultation with the education authority and reference to Standen in terms of its impact on pupil projections is included in the Council's supporting infrastructure plan. Accordingly, provision has been made for land to be made available within the scheme for a primary school and it is anticipated that an education contribution will be sought, which will be the subject of further development management discussions reflecting the policy framework that the Council has in place and indeed that which the County Council, as education provider follows. Given the timeframe of the plan, it is unlikely that the County Council will form a firm conclusion in relation to the timeframe for delivery of a primary school at this stage, which is a matter for that authority as education authority, however, the Council has recognised the need to make provision for education in its policy approach and has worked on the basis that land for a primary school will need to be provided within the overall scheme.

The proposal has a suggested masterplan, a copy of which has been developed in discussion with the Council and through the landowners' agents with relevant bodies and has been the subject of public consultation by the landowner prior to the submission of the application. The application is available to view on the Council's website using the planning application search, its reference number is 03/2012/0942. For information copies of the principal plans, planning statement and EA are included on an accompanying disc and will be added to the document library.

- 34. *Have any constraints been identified in relation to this site? What mitigation is likely to be needed? What level of employment use is anticipated? What types and scale of open space and community uses are envisaged? What***

infrastructure is necessary? Has the viability of the site been assessed, taking into account these factors, the possibility of a need for a new school, and affordable housing provision, along with any other policy requirements? Who will deliver the development, and when? Are delivery mechanisms in place? How would the delivery be phased?

The EIA report provides details on constraints, and the current application has been submitted taking account of these matters and in liaison with the relevant statutory bodies. The master-plan provides a framework for land-uses but is still subject to the development management process. Detailed phasing is to be established with the delivery of identified infrastructure. The site is in a single ownership which assists overall delivery. Further information is included in the application. Viability has been established by the applicant in preparing and submitting the application.

35. *Overall, what evidence is there which lends certainty that this key element of the CS is viable and will be delivered in the plan period?*

The number of housing units on the site has been determined in strategic terms by reference to the need to accommodate a significant proportion of development in a strategic location within the Council's approach. The number of units was initially established by reference to the availability of land and the level of requirement that was to be apportioned to the site using average densities. Account was also taken of the need to ensure that as a principle, the site overall provided scope to deliver not just the projected number of houses but also the supporting infrastructure, open space, landscaping, employment opportunities and high quality design features which are the principles that the Core Strategy is seeking to establish in promoting a strategic site.

As recognised in the Core Strategy, the detailed considerations would be applied through the development management approach including the preparation of the masterplan. The site has been brought forward by the landowners to reflect these considerations and to deliver the number of houses anticipated. Phasing is an important element of the scheme and delivery will ultimately be dependent upon how quickly the proposal is brought to the market and the associated ability of the market to bring phases forward. For the purposes of the Core Strategy, the whole number of units is accounted for within the plan period at this time. This would need to be kept under review as the plan period progresses and would be given consideration with the planned review period identified in the Core Strategy (commenced within five years from adoption). Monitoring of delivery would also inform the preparation of the Housing and Economic Dpd when any initial slippage could be accommodated.

AFFORDABLE HOUSING

36. *One of the Strategic Objectives at paragraph 3.12 of the CS aims to match the supply of affordable and decent homes with identified housing need. To my mind, this strongly suggests that it will meet the need. But the SHMA identifies a clear shortage of good quality affordable housing, especially for social rent. It says that housing need analysis suggests a shortfall of 264 affordable rented units per year. Unless I am missing something, it is clear that the CS will not meet even this specific need alone. If it is the case that the CS will inevitably fail to deliver this Strategic Objective, I suggest that its wording should be reconsidered.*

The mismatch between the SHMA identified figure of 264 and the overall housing requirement set out by the Core Strategy is recognised and indeed was an issue prior to the Core Strategy in relation to the regional strategy figures. However, it was also considered important to bear in mind that the under supply of affordable units identified in the SHMA in general delivered over the period prior to the regional strategy being in place and the effective impact of the Moratorium period between 2004 and 2008 when new permissions for market housing were severely restricted, served to remove opportunities for the shortage of units to be reduced during that period. This, coupled with a strong period of house price increase and a lack of affordable rental stock simply fuelled the shortfall which was recognised by the SHMA. Whilst the Council working with RSLs did manage to secure a number of schemes often using grant, this was not enough to address the shortfall. Whilst the high level of existing permissions continued to be built out, historically, few had affordable provision. This saw relatively high levels of completions continuing but with little additional delivery of affordable units. The compounding effect of this was to generate the backlog recognised in the SHMA.

Interestingly, as the Moratorium continued, we did see schemes being identified by landowners and developers that were focused on the delivery of affordable units. Many of these stalled however as the imminent change to Regional Strategy based figures (which were significantly higher) from county structure plan figures, started to influence hope values and schemes were held back. Other measures were put in place by the Council to encourage the delivery of affordable stock through landlord grant schemes and supporting purchase and repair schemes by registered providers. Within the strategy overall to address the shortfall, the Council was not therefore solely reliant upon the building of new stock to address the shortfall. Changes in tenure and bringing back into use through renovation was a mechanism that delivered additional rental units and served to help reduce that backlog without the need to construct additional units at the same level.

In any event the period that the SHMA looked at inevitably had to pick up the implications for the Council of having to catch up with the SHMA seeking to reduce the identified backlog of some 837 units over a five year period to 0 (which in itself would be quite ambitious and was always likely to be challenging) as well as addressing additional needs against a backdrop of an RS requirement of 161.

The objective is intended to apply over the plan period and the delivery of housing to meet the identified needs would be the subject of an identified review, informed by both up to date census information, monitoring and an updated SHMA, over the plan period it is anticipated that circumstances will be subject to change. The wording of the objectives is intended to be consistent with the Council's corporate objectives, housing strategy and community objectives established in the community strategy. In that regard, it is a relatively generic objective for the Council but it is recognised that it could be reworded specifically for the Core Strategy as its achievement is not an absolute in terms of the Core Strategy itself. It reflects the aspiration of the Council and could be reworded in the following form in order to be more achievable as a specific objective for the Core Strategy:

To increase the supply of affordable and decent homes in the borough to help meet identified needs.

37. *The SHMA says that affordable units should be prioritised in places such as Whalley, Waddington and Bowland, with more market than affordable units in*

St Mary's, Read and Simonstone, Primrose and Sabden. Is this still the case? If so, does the CS reflect this?

The SHMA identifies priorities based on findings of that report, the re-evaluation of priorities would occur through the update of the SHMA. However, our other housing information relating to Parish surveys and completions provides a helpful indication of how needs can change, as policies are implemented. Commitments to schemes in Whalley for example, are addressing needs. Similarly, completions and commitments are addressing needs in both Primrose and Sabden. The picture remains dynamic as schemes come forward. The Core Strategy provides for housing development through the pattern of distribution (Policy DS1), the housing requirement itself (Policy H1) and the provisions of Policy H2 that relate to the nature of housing either planned (by way of allocation) or approved through planning applications. The Core Strategy enables the Council to deliver its requirements whilst addressing need in a flexible and responsive manner over the length of the plan period. The Core Strategy recognises the relevant evidence base as the starting point, namely the SHMA and will facilitate through its policies the addressing of market and affordable needs through the Housing and Economic DPD, which is a key part of the Ribble Valley LDF.

38. *What evidence is there to demonstrate that the site size thresholds and the proportion of affordable housing sought in Key Statement H3 are viable? Has an Affordable Housing Viability Study been undertaken?*

The thresholds applied in the policy have been derived originally from previous national guidance and from experience of delivering affordable housing through development schemes. The policy was formed through the development and application of housing Committee policy, namely the Affordable Housing Memorandum of Understanding (AHMU) which was put in place to help deliver affordable housing following the adoption of the regional strategy in 2008 and the effective end of the structure plan moratorium. The document was not prepared as supplementary planning guidance; it was a practical tool, adopted by the Council's Housing Committee to assist the strategic housing team negotiate on affordable housing and to provide guidance to applicants in terms of the Council's approach to affordable housing generally. The document was drawn up in consultation with the Housing Forum (part of the strategic partnership) comprising developers, registered providers, local agents, tenants and landowners. The AHMU was also subject to public consultation. It was recently revised to deal in particular with the issues of increasing elderly provision that had been identified as an issue within the Council's strategic housing work. The 'Addressing Housing Needs in Ribble Valley' document (library reference Supp 4.7) superseded the AHMU was published for consultation and subsequently adopted by the Council in 2011. Its policy content was subsequently drawn into the Core Strategy.

A separate affordable housing viability study has not been undertaken. In reviewing the housing requirement figure, Nathaniel Litchfield and Partners, in their report, considered viability in its broadest application and whilst acknowledging the impact of the 2007 recession, concluded that overall, viability was not a significant issue given the nature and desirability of the area, the high market values attainable and the general deliverability of housing. The Council in completing the SHLAA undertook an element of viability testing as part of that SHLAA model.

In practice, as we are not at a stage where sites are being allocated, our policy takes an approach of testing viability where developers are not bringing forward the

Council's requirement on a case by case basis. In those cases where meeting the requirement is a viability issue, the Council has tested assessments with the advice of the District Valuer and agreed a level of provision through negotiation to enable schemes to come forward. Usually, these circumstances have been in relation to sites with difficult remediation or ground or site clearance issues or other requirements such as conservation or heritage matters, or a need to reflect particular extra ordinary infrastructure requirements. It should be noted that many sites brought forward more recently have met the Council's requirement at the level prescribed in the Core Strategy.

This approach allows the Council to respond flexibly as NPPF requires to differing circumstances in practice whilst providing a clear policy guidance to prospective developers on what the Council is seeking. When the Council progresses its site allocations DPD, it will, during that process, be in a position to test individual site options as part of its considerations.

HOUSING FOR THE ELDERLY

39. *Is it intended that the requirement to provide housing for the elderly would apply to all housing developments, as Key Statement H3 suggests?*

Yes. The Council's policy is to support the delivery of housing for the elderly. In the main, this is being delivered through attaining dwellings built to lifetime homes standards. In practice, where a scheme was being promoted by a developer where it was not considered appropriate to deliver elderly accommodation, the Council would make an exception, where justified and in the case of affordable housing, would seek a financial (commuted sum) or other contribution to offsite delivery as reflected in Policy H3.

40. *What evidence is there to demonstrate that the proportion of housing for the elderly sought would be viable? Has a Viability Study been undertaken?*

No specific viability has been undertaken. The thresholds reflect circumstances in the borough and the experience from developments that have been subject to negotiation. Viability in its broader sense is not, as previously discussed, viewed as a general constraint in the borough. Our policy makes provision for applications to be considered flexibly and a solution found to enable development to be delivered. Future work in relation to the Housing and Economic DPD and its allocations proposals will enable testing to be undertaken on the specific sites as relevant.

Gypsy and Traveller Accommodation

41. *Policy B of Planning for Traveller Sites says that local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs in their area, working collaboratively with neighbouring local planning authorities. It also says that in producing their Local Plan, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.*

The Council is aware of these requirements.

- 42. *It is therefore incumbent on the CS to properly address this, ideally by setting out the number of pitches and plots actually planned for. Paragraph 6.9 notes the figures from the GTAA. However, as things stand, Key Statement H4 does not set any explicit targets. Why not? Why is this issue effectively deferred to the Housing and Economic Development DPD?***

The Council confirms that it will meet identified needs for Gypsy and Traveller accommodation through its Core Strategy (Key Statements and Development Management policies) and the site allocations process. Key Statement H4 provides the strategic policy for the provision of Gypsy and Traveller accommodation. The 2008 GTAA provides the evidence of needs up to 2016, referred to in the supporting text. This is effectively the target for the plan period up to 2016, but clearly does not cover the whole plan period. Sites to meet G&T needs will be allocated through the Site Allocations process, in the same way as sites will be identified to meet the overall housing requirement. Development Management policy DMH2 provides the criteria for considering applications in advance or in addition to, any sites which might be allocated in a Site Allocations process.

The Council would consider adding reference to the identified needs for permanent pitches up to 2016 and transit pitches to Key Statement H4 and that needs beyond this would be determined through subsequent updates to the GTAA if the Inspector considers that this would add to the clarity of the plan.

- 43. *The GTAA was published in 2007 and only considers need up to 2021. In short, it is not particularly up-to-date and does not provide evidence for the whole plan period. I am concerned that any pitch and plot figures put forward for inclusion in the CS on the basis of this GTAA alone would not be founded on sufficiently robust evidence.***

The Council consider that the evidence provided in the GTAA provides robust evidence of need for Gypsy and Traveller Accommodation for the period covered. Whilst *Planning Policy for Traveller Sites* (CLG March 2012) advises local authorities to prepare an understanding of the up-to date accommodation needs over the “plan period”, CLG guidance on preparing GTAA’s states that:

“94. In the case of Gypsies and Travellers it will probably not prove realistic to try and forecast need for up to 15 years ahead, as is recommended within the Strategic Housing Market Assessment guidance for the rest of the community. However, the most accurate projections possible covering the next 5-10 years should be made.”

(Gypsy and Traveller Accommodation Needs Assessments, CLG [2007])

The GTAA was prepared in the context of the 2007. Nonetheless the Council is intent on refreshing the GTAA to provide evidence to inform the late stages of the plan period.

ECONOMIC DEVELOPMENT

Evidence base

- 44. *The CS appears to be underpinned by the Employment Land and Retail Study (ELRS) of October 2008. This is not especially recent.***

The Council considers that the ELRS of 2008 is still a robust body of evidence upon which to base relevant policies within the Core Strategy. Extant guidance (Employment Land Reviews – Guidance Note, ODPM, 2004, paras 5.11, 5.21, 5.41, 5.49) and the professional opinion of the consultants (ELRS paras 7.2 and 7.7) indicates that a 5 to 10 year timeframe is an appropriate period over which to assess future need with any degree of certainty, while recognising that LDF planning horizons are required to be over longer periods. Please see also answer to Q 47 below.

45. ***The Employment Land Position Update of June 2011 updates the employment land aspect of the ELRS. I note that it applies Methodology 1 of the ELRS. Paragraph 1.5 of the Update notes that it is not as comprehensive as the original ELRS. In what way? Is it as reliable and robust as the ELRS was when first produced? and***
46. ***Given that the ELRS is not recent, it is important that the Update is sufficiently robust to stand up to scrutiny through the examination process. Is the Council confident that it is?***

45 and 46 combined answer

The statement in para 1.5 of the Update relating to the update not being as comprehensive as the original ELRS relates to its more limited scope. It was not intended to replicate the totality of the ELRS, which encompassed detailed site analyses and scoring, modelling of various economic scenarios, business surveys and also detailed retail analysis.

However it was felt necessary, as outlined in Update para 1.3, given the changes in the wider economy immediately following the study, to hold a limited review focused on the headline employment land prediction of 6 ha. Using locally available data on post 2008 employment land development and losses, enquiry data and a focused survey of local professional commercial and industrial property opinion within the area, the justification for the 6 ha assessment was reconsidered using ELRS Model 1. It was felt inappropriate to use other models, as outlined in Update Section 2, given the wide variations that these gave in forecasts (see ELRS para 7.26) and also that the ELRS considered that Model 1's figures gave the most secure results, ie the 6 ha requirement to 2018.

In short the comment regarding comprehensiveness relates purely to the limited scope of the Update. Within that scope the Council considers that the Update is robust and reliable, ie that the findings and predictions of the ELRS remained broadly correct in 2011 despite the decline in the economy flowing from the recession post 2008.

47. ***Paragraph 161 of the NPPF says that the evidence base should be used to assess the needs for land or floorspace over the plan period. As the CS runs to 2028, neither the ELRS nor the Update do this. Why not? This could be a fundamental problem, and I am concerned about it.***

As mentioned in relation to question 44 above the Council believes that current guidance in relation to Employment Land Reviews, and the professional advice within the ELRS indicates that robust predictions of forward supply are limited to a 5 to 10 year horizon, while LDF timescales are required to be over longer periods, in Ribble

Valley's case to 2028. Both the ELRS (2008 to 2018) and the Update (2010 to 2020) follow the ten year model and predict a 6 ha need. The Council recognised this difference and therefore have in general terms extended the 6 ha figure pro rata into the future to arrive at 9ha. The detail of this calculation is elaborated in the answer to question 49 below. However the Council also considers that this 9ha figure to 2028 and the 6ha 10 year figure will need to be regularly reviewed, as should all evidence base documents, to ensure that they remain credible in what is acknowledged in this particular context to be a relatively volatile and essentially speculative market.

48. Clarification: The original ELRS recommended that an additional 6ha of employment land should be identified to provide for the next ten years (up to 2018). The Update reaches the same conclusion in relation to the period 2010 to 2020. However, while I note paragraph 4.1 of the Update, I am not entirely clear about this 6ha figure. Does it include within it the land identified by the original ELRS to 2018? In short, is the 6ha figure given in the Update fully comprehensive?

The ELRS identified a series of sites (for the purposes of this answer they could be termed "Recommended Sites") it considered were credible elements of forward supply in 2008 (see ELRS Chapter 6). These were also outlined in Update Table 6 and added up to 12.52 ha. The Update then considered which of these Recommended Sites or parts of them had been developed since 2008 for various uses (3.73 ha). This left a rump of 8.8 ha that remained and could be considered as part of the forward employment land resource, as outlined in Update Table 8.

In addition during 2008 to 2010 1.74 ha of land had been developed for employment uses (this excluded the developed parts of the ELRS "Recommended Sites" for employment uses which is included within the 3.73 ha mentioned above) and also 2.6 ha of existing employment land (none of which related to the ELRS Recommended Sites mentioned above) had been lost to other uses and would therefore need to be made good in any forward supply calculations.

Update Table 8 summarised these elements and set them against an overall ten year need for the Borough of 13.5 ha. The detailed calculation of this figure is set out in Update para 3.2 and in Update para 4.2. Briefly this derives from a figure of 0.9 ha per year relating to employment completions 2008 - 2010 (excluding the Samlesbury Strategic site) plus a five year buffer of 0.9 ha per year as recommended in the ELRS Model 1 para 7.7. In short the overall need calculation for ten years based on the pattern of completions during 2008 – 2010 is:

$$10 \times 0.9 + 5 \times 0.9 \text{ (buffer)} = 13.5$$

Taking all the above into account the Update suggests that the Borough requires an extra 6ha of employment land over and above existing supply (this existing supply includes the 8.8 ha of remaining ELRS "Recommended Sites") during the period 2010 – 2020, a similar figure to that recommended over a ten year interval in the original ELRS running from 2008 to 2018.

For the period quoted in the Update and at the time the Update was produced therefore the 6 ha should be considered as comprehensive.

Level, location and type

- 49. Key Statement EC1 says that the Council will aim to allocate an additional 9ha of land for employment purposes in appropriate and sustainable locations, giving priority to previously developed land. What is the justification for the 9ha level quoted? How has this been arrived at from the figures given in the ELRS and the Update?**

The figure of 9 ha within EC1 is derived from the evidence base of 6 ha over a ten year period established within either the ELRS 2008 – 2018 or the Update 2010 – 2020 (as described above in answer to questions 47 and 48) and extended forward on a rational basis to 2028, given the caveats mentioned in answer to question 47 in relation to extending evidence based on a ten year period over the longer period of the Core Strategy.

This extension is based on the following formula;

An assumption is made that the established 6 ha figure over a ten year period can be extended into the future on the basis of 0.6 ha per year (6 divided by 10) and also assuming a base date of Core Strategy adoption of 2013 and an end date of 2028 ie 15 years then this gives a figure of $0.6 \times 15 = 9$ ha.

This both incorporates the evidence based 6 ha figure over ten years and gives a rational basis for its extension beyond that period as required. However this extension should be subject to regular review during the lifetime of the Core Strategy.

- 50. Does the 9ha include land at the BAe Samlesbury site and/or Barrow Enterprise Park, or are these strategic sites discounted from this figure?**

In line with the evidence in the ELRS (ELRS para 6.8 and para 6.29) neither the Samlesbury site or the site called Barrow Brook Enterprise Park (also termed Barrow Brook Business Park in the ELRS Chapter 6) are included within the 9 ha future requirement quoted in EC1. This exclusion of the Samlesbury site is also specifically mentioned in EC1 para 7.

The calculation of the 9 ha has involved consideration of those undeveloped parts of the Barrow Brook Business Park sites mentioned in the ELRS Chapter 6 eg Tables 38 and 42 in the answer to question 48 above. In that answer the Barrow sites are a part of the ELRS “Recommended Sites” and as such are considered a part of existing supply. The 9 ha should be considered as a requirement over and above this existing supply.

- 51. Where will this 9ha be allocated, broadly speaking? Unless I am missing something, there is no tangible spatial indication in the CS of how much of this 9ha will go where. I am concerned that the CS may not give a sufficiently clear strategic steer to the future allocation of land for employment.**

Core Strategy paras 7.4 and 7.5 are considered to indicate the broad locations of employment development. Para 7.5 states that,

“The larger settlements of Clitheroe, Longridge and Whalley would be the preferred locations of new employment development (excluding rural and home based employment, which are district wide). It is recognised that suitable locations that are well related to the A59 corridor will also have the potential to deliver economic growth through the delivery of appropriate sites. The potential for appropriate land to be brought forward as part of strategic land releases will also be considered particularly

where this will contribute to greater sustainability. Growth at the BAe Samlesbury site is anticipated to occur given that it is a regionally significant site and now part of the Lancashire Enterprise Zone. This will also provide an opportunity for wider economic growth in Ribble Valley over the plan period. The Council considers Barrow Enterprise Park to be an important employment land resource that has the significant potential to provide for economic growth and deliver sustainable development for the borough.”

These statements are in accord with ELRS evidence eg ELRS Chapter 11 Recommendations.

52. *What types of economic activity are anticipated over the plan period, and what are the quantitative and qualitative needs for each (paragraph 161 of the NPPF)?*

The quantitative and qualitative needs for foreseeable types of economic development within the borough are outlined in detail within the ELRS, including a business needs survey (ELRS Chapter 5). Within the context of a strategic document such as a Core Strategy it was felt appropriate to deal with qualitative and quantitative need by referring to broad categories of local economic activity such as town centres and retail (EC2 and paras 7.7 to 7.12), and the visitor economy (EC3 and paras 7.14 to 7.16). In referring to these broad sectors of the economy the Core Strategy directly references the relevant evidence bases such as the ELRS and the Clitheroe Town Centre Masterplan.

Para 7.17 specifically refers to the ELRS and its recommendations such as the need for office premises within the A59 corridor while para 7.15 points out the lack of wet weather tourism attraction provision and the need for new investment within the hotel sector.

These statements also need to be considered in the light of the strategic locational guidance within paras 7.4 and 7.5 as mentioned above in answer to question 51.

Also there are various specific Development Management (DM) policies associated with the above broad economic categories that also address economic needs including DMR1 Clitheroe retail; DMR2, Longridge and Whalley retail; DMR3 retail outside main settlements, DMB3 recreation and tourism development, DMB1 supporting business growth and the local economy.

53. *Overall, I am concerned that the CS may not be as robust and effective as it should be in addressing the economic development needs of businesses.*

The Council considers that the Core Strategy does set out, at a level of detail appropriate for such a strategic document, the general future needs of business as revealed in the detailed evidence bases including the ELRS and Clitheroe Town Centre Masterplan and through the various consultations at both Issues and Options and Preferred Options stages.

Town centres and retail development

54. *Is there more up to date evidence about the quantitative and qualitative need for retail development than that in the ELRS?*

No, however following production of the ELRS, BE Group were re-commissioned by the Council to assess the impacts of the Credit Crunch and consider how the global slowdown and wider macro-economic factors in 2008/2009 would affect the property market locally. This work is within a short document called "Ribble Valley Economic Review".

The report was needed to predict the implications not only for the outcome of the ELRS, but also to help determine public sector policy. The client group wanted to understand if there were any counter-cyclical measures that they could put in place.

It identified key developments at risk, sites where delivery may be delayed, and types of property development where market failure will increase. Ribble Valley is likely to experience falling demand for employment land, a reduced business start-up rate, greater demand for cheaper business accommodation and falling commercial rents. Consumer spending will decrease, and shops will suffer from greater competition from larger retail centres. It did not suggest any significant changes in predicted future land requirements or changes to the strategic location of future development.

55. *The ELRS identifies a need for just short of 15,000 sqm of retail floorspace in the borough up to 2018 for it to retain its existing market. The CS does not make any obvious attempt to directly address this. Why not?*

The Council considers that this question is addressed in strategic terms within Core Strategy Para 7.8

"The LDF evidence base identified a need for additional shopping facilities and retail floor-space over the next ten years. It is important to meet these needs in ways that enhance the vitality and viability of town centres. In terms of the retail findings there were a number of messages. Of importance was the poor share of spending that was retained within the catchments of each of the centres of Longridge, Whalley and Clitheroe. This in turn raises the need to review how these centres could be making a greater contribution to issues around sustainability, and supporting their own continued vitality and viability."

Specific allocations of sites and /or relevant site criteria to address the requirement will be made within the forthcoming Allocations DPD. In more general terms this requirement will also be guided by Key Statements EC 1 to 3.

In addition, since the ELRS (and not factored into the 15000 sq m requirement) there have been two major retail developments completed within Clitheroe by the Homebase and Lidl chains supplying in total over 5,500 sq m of new floorspace by 2011.

56. *The ELRS says that Clitheroe Town Centre is showing signs of decline. Paragraph 7.13 says that the Clitheroe Town Centre Masterplan, which I understand was adopted by the Council in June 2010, will inform the preparation of more detailed policies. What policies does this refer to? Are they in the CS? If not, why not? Has the Masterplan been produced in evidence for the CS examination – I do not appear to have been provided with a copy. I am concerned that the CS neither reflects any existing Masterplan for Clitheroe even in the broadest, most strategic terms nor seeks to positively tackle the identified decline of Clitheroe town centre.*

The Council does consider that the Masterplan does adequately inform the Core Strategy.

On Page 30 of the Core Strategy the Clitheroe Town Centre Masterplan is referred to

'In June 2010 the Council formally adopted the Clitheroe Town Centre Masterplan. This work is intended to provide a framework for sustaining and promoting growth in Clitheroe. It sets out a number of approaches including potential development areas and townscape improvements. Developed over a period of 12 months consultants established a baseline of evidence, then developed a series of options and approaches to addressing the challenges faced by the centre. The proposals were subject to widespread public consultation and have provided a strategic steer for Town Centre activities. The work has enabled the creation of a Town Team which is currently reviewing activities and its focus.'

This work has then informed Core Strategy Chapter 7 paras 7.7 – 7.12, including specific commitments within 7.9 to addressing Clitheroe's declining status. These statements are themselves then supplemented by detailed Development Management policies, specifically Policy DMR1 Retail Development in Clitheroe (Page 112-3)

'Proposals for shopping developments within the main shopping centre of Clitheroe.....Special regard will be had to the likely contribution of the proposals to the vitality and viability of the centre.....Within the principal shopping frontage of Clitheroe, as defined on the proposals map, the only new uses considered appropriate at ground floor level will be uses included in class A1.....Other uses will only be considered in exceptional circumstances where there would be no material adverse effect on the character of the frontage, general amenity or highway safety”.

And also,

“The introduction of non-retail uses such as banks, building societies and estate agencies into the defined principal shopping creates breaks, weakening the quality of the principal shopping streets and potentially forcing retail uses onto secondary streets, thus threatening the vitality of the town,”

Also,

“Clitheroe acts as a principle service centre for the borough. The management of its facilities and development of new capacity is vital to the delivery of the development strategy and the economic well being of the borough.”

Given the above the Council does consider that the Core Strategy does sufficiently relate to the Masterplan and follows this through to specific policies designed to tackle Clitheroe's retail problems. This will be amplified through the town centre elements, including the allocation of areas for re-development in accord with the Masterplan proposals as part of the forthcoming allocations based work.

57. *The ELRS says that Longridge is not doing as well as it could be. Again, the CS appears to do little to address this problem.*

The Council does consider that the difficulties identified in the ELRS in relation to Longridge are addressed at a strategic level within the Core Strategy. Within Key Statement EC2 (Page 69) development of retail, shops and community facilities and

services a strong statement of commitment to the area's retail, specifically including Longridge is made:

'Development that supports and enhances the vibrancy, consumer choice and vitality and unique character of the area's important retail and service centres of Clitheroe, Longridge and Whalley will be supported in principle.'

This is specifically amplified in Development Management policy DMR2 (page 115): shopping in Longridge and Whalley

'Proposals for new small scale shopping developments including existing facilities will be approved on sites which are physically closely related to existing shopping facilities.....Longridge and Whalley will continue to be the other main shopping areas of the borough. Their size and facilities are more closely related to local shopping needs than those of Clitheroe. However it is recognised that Longridge serves a wide hinterland.'

This commitment will be continued in the forthcoming Allocations DPD work.

- 58. Overall, I am concerned that the CS may not be sufficiently proactive, or do enough to deliver retail and town centre uses and tackle the identified issues in Clitheroe and Longridge.**

The Council does consider that the Core Strategy makes a clear strategic commitment to the retail centres of Clitheroe and Longridge and includes specific Development Management policies designed to protect these centres. This work will be further developed within the later Allocations DPD.

Sustainable development and climate change

- 59. Paragraphs 93 and 97 of the NPPF explain the key role of planning in tackling climate change and what action local planning authorities should take. What are the Council's strategic priorities for renewable and low carbon energy? How does the CS provide a positive strategy to promote energy from renewable and low carbon sources?**

Key Statement EN3 (paras 4 and 6) commits the Council to specifically address renewable energy in broad terms.

It adopts a flexible approach to renewable provision by referring to optimising energy efficiency through the use of "new technologies" rather than referring to specific technologies in what is a rapidly changing sector. This allows for the incorporation of new advances in provision over the plan period. On larger schemes it specifically mentions the need to provide a proportion of renewable energy/low carbon energy (from whatever technology) based on targets elaborated within relevant Development Management policies, such as DME5 (see below).

DME5 Renewable Energy includes positive encouragement for renewable energy (as recommended within RS policy EM17) within bullet 8 (ie para following bullet relating to potential impact on biodiversity). This also follows EM 17 recommendations in stating thresholds and target percentages for renewable derived energy in relation to both non-residential and residential development in line with accepted practice and

also a commitment to uprating these in line with national targets. This policy also contains site based and other criteria in relation to environmental protection which also follows guidance within RS policy EM 17.

It also refers to the AONB Renewable Energy Position Statement of 2011 in assessing proposals within the AONB area, which is over 70% of the land area of the Borough. (see answer to Q 61 for further detail of this document).

60. *Has the Council considered identifying suitable areas for renewable and low carbon energy sources?*

In relation to the identification of suitable geographic areas of the Borough this work will be a part of the forthcoming Allocations DPD.

61. *Specifically in relation to plan making, the NPPF says that local planning capacity of infrastructure for energy, including heat, and take account of the need for such infrastructure. Has this been done? If so, what evidence is there to demonstrate this?*

Ribble Valley was involved in the recent work produced by the CLASP programme (see detail in 62 below), which also involved all other Lancashire local authorities. This assessed local energy infrastructure including heat and will inform future work.

In addition the Council have worked with several other local authorities and other bodies in developing the Forest of Bowland AONB Renewable Energy Position Statement, which is used in the authority's current consideration of relevant planning applications. This also helps to guide appropriate elements of renewable energy development within this designated area.

Copies of these documents will be sent forthwith in hard copy and on disc and placed in the document library.

62. *Policy EM17 of the RS sets specific targets for the electricity to be provided from renewable energy sources up to 2020. It also says that local authorities should work with stakeholders to prepare sub regional studies of renewable energy sources, to form the basis for establishing local strategies and targets for renewable energy resources. It appears that the CS provides no such strategy or targets. Why not? Is it in general conformity with the RS in this regard?*

As a preparation to setting future renewable energy targets and later identification for proposed schemes Ribble Valley has worked with the Climate Change Local Area Support Programme (CLASP) to produce sub regional resource studies. Specifically these studies are;

Lancashire Sustainable Energy Study – Ribble Valley Renewable Energy Potential (April 2011).

This was a resource assessment for the area to 2020 for the following technologies: onshore wind, biomass, small-scale hydropower and microgeneration (specifically solar voltaics, water heating and heat pumps). It also included initial assessments

for combined heat and power and district heating schemes, which were then to be subject to more detailed further work. This study related purely to technical potential and not to deployable potential.

Taking Forward the Deployment of Renewable Energy – a Final report to Lancashire County Council (July 2011)

This report deals with the deployment issues relating to all the technologies mentioned in the earlier report and was commissioned in preparation for the revocation of the RS and its targets.

- 63. *Key Statement EN3, as I understand it, relates to sustainable design and construction. However, it does not include any specific standards to be met. In this absence, how will it be effective?***

In relation to the inclusion of “appropriate recognised sustainable design and construction standard” within the first para of EN3 the Council is aware that such standards are regularly amended to take into account changes in technologies and other factor and therefore felt that this general wording was appropriate. However reference could be made to specific current standards if this was felt to be more appropriate. By “appropriate recognised standards“ the Council is referring to the current standards such as Code for Sustainable Homes, BREEAM standards, Lifetime Homes and Building for Life.

- 64. *Policy EM18 of the RS says that DPDs should set out: targets for the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources, based on appropriate evidence and viability assessments; and the type and size of development to which the target will be applied. Key Statement EN3 does not do this. Why not? Is the CS in general conformity with the RS in this respect?***

While Key Statement EN3 does not mention specific targets for renewable energy from new development and associated types and sizes of such development to which the targets will be applied in line with RS EM18 these are both within Development Management Policy DME5 Renewable Energy. Core Strategy para 5.3 should make a reference to DME5 but this is missing and 5.3 should therefore be corrected to include it.

The policy and statement also take into account viability experience of successfully applying these standards and thresholds to recent planning applications, examples of which can be provided.

- 65. *Have any thresholds and specific standards been considered by the Council? Is there any evidence of viability in relation to the application of specific standards?***

Thresholds and standards of renewable energy provision in relation to new development are outlined in Development Management policy DME5. These standards and associated viability have been tested locally through recent planning applications. Specific examples of such applications can be provided

- 66. *Overall, I am concerned that the CS takes a passive/reactive approach to renewable and low carbon energy, rather than adopting the proactive strategy***

expected by the NPPF. I am also concerned about the effectiveness of the measures the CS does include.

The Council considers that the Core Strategy does present a positive strategic position regarding renewable and non-carbon energy that is in line with current RS guidance if both Key Statements and relevant Development Management policies are taken together. The Council, in applying the quoted targets and thresholds in the Strategy to recent local applications, has also been able to test their viability in local circumstances.

Green Belt

67. Paragraph 5.1 says that some minor changes to the Green Belt will be considered in response to the findings of the evidence base, and will be dealt with through other DPDs. What evidence base findings justify this? Please explain the CS intentions in relation to the Green Belt boundary.

The Council undertook a review of greenbelt boundaries in 2008; the findings of which are included in the evidence base document – Greenbelt Review 2008 (Library reference: Supp 4.4). This highlights areas where some rationalisation of the greenbelt boundary needs to be undertaken subsequent to its original designation in 1997 and this is anticipated in the preparation of settlement boundaries and allocations within the Housing and Economic DPD as a consequence. Pending the replacement of the Districtwide Local Plan, the proposals map for the DWP will provide the defined boundaries of the greenbelt. The Council recognises that future DPDs will need to be produced and that where the greenbelt revisions fall outside the scope of the current work programme, either a new DPD will be identified or the revisions will form part of the move towards a new NPPF style local plan generated as part of the intended Core Strategy review.