Core Strategy Consultation
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

15 June 2012

By email and post
response@ribblevalley.gov.uk

Ribble Valley Core Strategy Publication Version
(Regulation 19) Consultation Draft

On behalf of [redacted], please find enclosed
representations prepared in response to the publication version of the Core
Strategy (May 2012).

[redacted] is a property investment and development company that is promoting land
at Lawsonsteads Farm, east of Clitheroe Road in Whalley for a residential led
mixed-use development. An application for development on the site is currently
being considered by the Council (Application Ref: 3/2012/0327).

It is against this context that we have reviewed the publication version of the
Core Strategy, and enclose a statement detailing our comments.

We trust that these comments will be taken into account alongside those
previously submitted, however should you require any clarification on any of the
points made, please do not hesitate to contact us.

Yours faithfully

Enc: Representations
cc: [redacted]
Before using this form to make any comments please ensure that you have read the Core Strategy document and the Guidance Notes, which can be found on Ribble Valley Borough Council's website - www.ribblevalley.gov.uk and follow the Core Strategy link. If after reading the Guidance Notes you should have any queries in completing the form please telephone 01200 425111.

This form has two parts: -
Part A - Personal Details (you need only complete one copy of Part A)
Part B - Your comment(s) (Please complete a separate Part B for each comment you wish to make.)

All completed comments forms must be received by the Council no later than 5:00pm on Friday 15th June 2012.

Please return paper copies marked 'CORE STRATEGY CONSULTATION' to Council Offices, Church Walk, Clitheroe, BB7 2RA

Part A

Q1 Please can you provide the following information which will assist us in contacting you if we need to discuss any of your comments further.

Name
Name of Organisation (if you are responding on behalf of an organisation)
Database Reference number (if you have one)
Address
Post Code
Email address
Phone number

Copies of all comments made in Part B of the form will be put in the public domain and are not confidential, apart from any personal information. All personal information within Parts A and B will only be used by the Council in connection with the Local Development Framework and not for any other purpose and will be held in accordance with the Data Protection Act 1998. The Council will summarise the comments and all representations will be made available to the Planning Inspectorate.
Part B

Please use a separate form for each individual comment.

Q2  Name / Name of Organisation (if you are responding on behalf of an organisation)

Q3  To which part of the Core Strategy does this comment relate?
Part of document eg Key statement reference, 'Vision' section etc...
Paragraph No.

Q4  As a consequence do you consider the Core Strategy is:

   i) Legally compliant  Yes  No  

   ii) Sound  

* The considerations in relation to the Core Strategy being sound are explained in the Guidance Notes

Q5  If you consider the Core Strategy is unsound, is this because it is not... (please tick the appropriate box)

   Justified  Consistent with national policy  
   Effective  Positively prepared  

Q6  Please give details of why you consider that the Core Strategy is not legally compliant or sound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments. Please continue on a separate sheet if required.

SEE ACCOMPANYING STATEMENT
Q7 Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness.

You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible. Please continue on a separate sheet if required.

SEE ACCOMPANYING STATEMENT

Please note: your comment should cover succinctly all the information, evidence, and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be another opportunity to make further comments based on the original comment made at the publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination in the forthcoming Examination in Public. Please note also that the Inspector is not obliged to consider any previous comments that have been made in respect of the Core Strategy. You are urged, therefore, to re-submit on this form any previously submitted comments that, in your view, remain valid and that you wish the Inspector to consider.

Q8 If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

- [ ] No, I do not wish to participate at the oral examination
- [✓] Yes, I do wish to participate at the oral examination
Q9 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Please note that the Inspector will determine who participates.) Please continue on a separate sheet if required.

CEG HAS BEEN WORKING WITH THE COUNCIL SINCE 2010 AND CLOSELY MONITORING AND PROVIDING INPUT TO (WHERE NECESSARY) THE LDF PROCESS, IN PARTICULAR THE EVOLVING CORE STRATEGY. CEG HAS PUT FORWARD DETAILED COMMENTS ON THE EMERGING POLICY PROPOSALS BUT WOULD WELCOME THE OPPORTUNITY TO DISCUSS THESE FURTHER WITH THE INSPECTOR, COUNCIL AND OTHER PARTIES AT THE EXAMINATION. NOT LEAST, CEG CONTROLS A SIGNIFICANT AREA OF LAND IN WHALLEY WHICH CAN POSITIVELY CONTRIBUTE TO THE FUTURE GROWTH OF THIS KEY SETTLEMENT.

Q10 If you wish to be kept informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the box(es) below.

- Submission of the Core Strategy to the Secretary of State for independent Examination
- The publication of the Inspector's report following the Examination
- The formal adoption of the Core Strategy

Q11 If you have any other comments to make on the Core Strategy that have not been covered elsewhere, please use the box below. Please continue on a separate sheet if required.

SEE ACCOMPANYING STATEMENT

Q12 Date of completion

15/06/2012

Q13 Signature

Thank you very much for taking the time to complete this comments form, your comments are very much appreciated.

If after reading the Guidance Notes you should have any queries in completing this form please telephone 01200 425111
Core Strategy 2008 – 2028
A Local Plan for Ribble Valley
Regulation 19 Consultation Draft

Representations on behalf of
Core Strategy 2008 – 2028
A Local Plan for Ribble Valley
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Representations on behalf of

June 2012
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Representations on behalf of

Appendices

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Copy of Regulation 25 (now Regulation 18)
Representations (dated 20 October 2010)

Appendix 3
Copy of Letter to RVBC with regards the Regulation 18
Consultation (dated 5 August 2011)

Appendix 4
Copy of Regulation 18 Representations
(dated August 2011)

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Copy of Letter to RVBC with regards the Housing
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Appendix 6
Planning Inspectorate – Presumption in Favour of
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1. **Executive Summary**

1.1. The draft Core Strategy is neither legally compliant nor sound as it does not reflect the Council's evidence base in a number of ways, in particular, with regards its approach to housing delivery.

1.2. The draft Core Strategy does not appear to plan for economic growth which is contrary to the principles underpinning the NPPF.

1.3. With regards housing provision, the Council's evidence suggests a requirement of 220 dwellings per annum (NLP) but our own independent research identifies that there is actually scope for in the order of 310 dwellings per annum. Therefore, the overall residential requirement over the plan period should be a minimum of 4,200 dwellings, but if the Council is planning for economic growth (in line with NPPF), then the housing requirement should be more in the order of 6,200 dwellings over the plan period.

1.4. The Council's evidence base points to apportionment based around existing key service centres, namely Clitheroe, Whalley and Longridge, i.e. to benefit from, sustain and potentially improve access to existing services, facilities and public transport. This points to even apportionment in key centres but the Council's approach is to suppress growth outside of Clitheroe with 50% of new development being focused into Clitheroe.

1.5. There is a significant lack of evidence that supports this approach which will result in an unsustainable pattern of development and will undermine delivery of growth in other key centres, to the detriment of meeting *inter alia* local housing needs. On this basis, we can only conclude the approach is politically motivated rather than based on a sound evidence.

1.6. Overall, the Council should plan to deliver between 4,200 and 6,200 dwellings over the next 20 years, with 25%-30% of this growth apportioned to the key service centre of Whalley.

1.7. In order to demonstrate deliverability of this approach, strategic sites should be identified to ensure development in the most appropriate locations comes forward. In this regard, the Lawsonstead's site represents a suitable and sustainable location for meeting planned growth in Whalley.
2. Introduction

2.1. This Statement has been prepared on behalf of Commercial Estates Group (CEG) in response to Ribble Valley Borough Council's (RVBC's) consultation on its Regulation 19 Consultation Draft Core Strategy, published May 2012.

2.2. CEG is promoting land east of Clitheroe Road (locally known as 'Lawsonsteads') in Whalley for development. A site location plan is contained at Appendix 1.

2.3. It is against this context that the following sections of this Statement have been prepared, reflecting not only CEG's commercial interests in this site but the suitability of the Key Service Centre of Whalley in accommodating future development and in helping deliver the Council's overall plan for the Ribble Valley.

2.4. The purpose of the Council's latest consultation is to outline its preferred strategy for growth including overall vision, objectives and delivery strategy. To this end, it not only details thematic policies but development management policies which will provide the mechanism for implementation of the Council's plan.

2.5. The following sections set out our response to the Council's proposed draft strategy with references to the guidance contained within the National Planning Policy Framework (NPPF) and the tests of soundness.

2.6. In particular, the following areas will be addressed:

- legal compliance;
- the legitimacy of the proposed plan period;
- the level of housing growth required during this period and how this relates to the Council's evidence base;
- how future housing is proposed to be apportioned between settlements;
- how this relates to the current settlement hierarchy and access to services, facilities and public transport and information provided in the Council's evidence base;
- the suitability of the proposed strategic extension to Clitheroe including rationale and evidence base; and
- the appropriateness of development management policies dealing with issues of development in the open countryside, housing requirements, transport, and planning obligations.

2.7. Regard has also been had to the guidance produced by the Planning Advisory Service (April 2012) 'Local Plans and the National Planning Policy Framework: Compatibility Self-Assessment Checklist'. Whilst not policy guidance itself, it does provide an additional useful...
frame of reference when reviewing the draft Core Strategy.

2.8. This Statement follows on from representations previously submitted in response to earlier draft consultations (August 2010 and July 2011) and more recently with regards emerging evidence base documents.

2.9. In accordance with the Council’s accompanying guidance notes with regards this consultation, we enclose a copy of these previous representations as these remain relevant alongside the comments contained within this Statement, to the Inspector’s consideration of the submitted Core Strategy in due course (see Appendices 2, 3, 4 and 5).

2.10. We have not sought to repeat comments made in previous representations within this Statement but do refer to these as appropriate and would urge the Council and future Inspector to consider our earlier representations in the round as well.
3. Relevant Planning Policy

3.1. This Statement has regard to guidance contained within the National Planning Policy Framework (NPPF) published March 2012. Whilst the Council has provided some guidance notes with regards the definitions of soundness set out in the NPPF, the draft Core Strategy should be considered against the NPPF as a whole, including the presumption in favour of sustainable development.

3.2. We set out below those sections of the NPPF which are particularly pertinent to consideration of proposals contained within the draft Core Strategy, in addition to the tests of soundness.

The presumption in favour of sustainable development

3.3. Paragraphs 6 and 7 set out the Government’s view of what sustainable development means in practice and outlines three key dimensions: economic, social and environmental.

3.4. For plan making, paragraph 14 is clear that this means that:

- local authorities should positively seek opportunities to meet the development needs of their area;
- local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.

Core planning principles

3.5. Paragraph 17 provides a set of core land-use principles which are intended to underpin both plan making and decision taking. These include:

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth
- take account of the different roles and character of different areas ... recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

Supporting a prosperous rural economy

3.6. Paragraph 28 promotes economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development, including through the retention and development of local services and community facilities in villages.
Promoting sustainable transport

3.7. Paragraph 35 encourages plans to protect and exploit opportunities for the use of sustainable transport modes whilst paragraph 37 promotes a balance of land uses so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

Delivering a wide choice of quality homes

3.8. Paragraph 47 addresses the need to boost housing supply and encourages local planning authorities to:

'Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying sites which are critical to the delivery of the housing strategy over the plan period'.

3.9. In addition, it states that local planning authorities should:

'Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land';

'Identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15';

'For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five year supply of housing land to meet their own housing target'.

3.10. Paragraph 52 goes on to state:

'The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns'.

3.11. With regards the promotion of sustainable development in rural areas, paragraph 55 advises:

'Housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances'.

Promoting healthy communities

3.12. Paragraph 70 seeks to ensure an integrated approach to considering the location of housing, economic uses and community facilities and services in order to deliver the social, recreational and cultural facilities and services the community needs.

Plan making

3.13. Paragraph 151 requires local plans to be prepared with the objective of contributing to the achievement of sustainable development (reflective of the requirements of Section 39(2) of the Planning and Compulsory Purchase Act 2004). To this end, paragraph 151 requires plans to be consistent with the principles and policies set out within the NPPF including the presumption in favour of sustainable development.

3.14. Paragraph 156 requires the strategic priorities for the area to be outlined, including details of the homes and jobs needed in the area and the provision of infrastructure.

3.15. However, the key guidance is contained within paragraph 157 which inter alia states that local plans should:

- plan positively for the development and infrastructure required in the area in accordance with the NPPF;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements and be kept up to date; and
- indicate broad locations for strategic development.

3.16. Paragraph 158 requires local plans to be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of an area. In addition, assessments of housing, employment and other uses should be integrated and take full account of market conditions.

Planning strategically across local boundaries

3.17. Paragraphs 178 to 181 require public bodies to work collaboratively and cooperate on planning issues that cross administrative boundaries relating to the strategic priorities identified at paragraph 156 of the NPPF.

Examining local plans

3.18. Paragraph 182 explains the tests of soundness against which the local plan will be examined. It states:

'A local planning authority should submit a plan for examination which it considers is "sound" – namely that it 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 principles of the Framework’.

3.19. The following sections of this Statement have been prepared having regard to the NPPF, in particular the aforementioned paragraphs, alongside the legislation contained within the Planning and Compulsory Purchase Act 2004 and the Planning Advisory Service compatibility checklist.
4. Legal Compliance

4.1. The Council has published a Regulation 17 Statement: Representations under Regulation 18 (April 2012) which outlines how previous stages of consultation and engagement have shaped the current draft Core Strategy.

4.2. Section 4 of the Regulation 17 Statement outlines the consultations undertaken, including with regard to the Council’s evidence base. Reference is made to there being opportunity to comment on *inter alia* a Housing Requirement Review Report.

4.3. This report, produced by Nathaniel Lichfield & Partners on behalf of the Council (published November 2011) is an evidence base document intended to inform decision making and preparation of the Core Strategy. In particular, it is important in informing decisions about levels of housing growth, and the implications of this on other parts of the strategy, including the need to identify strategic sites / locations for development, the apportionment of development to individual settlements and the relationship between housing and economic growth and need for additional employment land.

4.4. On this basis, it is important to note that this document was only published following Issues and Options Consultation (October 2010 and June 2011). Furthermore, that the Council agreed the proposed direction of travel within the Core Strategy, in particular, the apportionment of growth to settlements (discussed at committee on 8 December) without recognising the findings of the study work undertaken by NLP (or even that it had been commissioned).

4.5. Given the importance of the NLP report and significance of its findings on the Core Strategy, the Council failed to recognise the role this study had in informing future growth decisions. As a result, there has been no opportunity (until now) for interested parties to consider the implications of the supporting evidence base in terms of each of the growth options previously identified.

4.6. We have serious concerns regarding the validity of the approach to growth being endorsed by the Council and in overall terms, it is our view that insufficient consultation has been undertaken on the adequacy of and findings of the evidence base, and how it has influenced the Core Strategy to date, taking the issues in the round. As a result, the draft Core Strategy fails to satisfy the legal requirements for its preparation.

4.7. In addition, Section 1.7 of the draft Core Strategy refers to the Council’s Sustainable Community Strategy (SCS) and how it is intended that the Core Strategy will set out what the SCS is seeking to achieve in land use and development terms.
4.8. We have reviewed the Council’s SCS (March 2008) and note that its Vision for the Ribble Valley area is stated as:

‘An area with an exceptional environment and quality of life for all, sustained by vital and vibrant market towns and villages acting as thriving service centres, meeting the needs of residents, businesses and visitors’ (page 7).

4.9. Major issues for the area are identified within the SCS include:

- the need to address the implications of an ageing population;
- to address the lack of affordable housing;
- to maintain the sustainability of the rural community, in particular, the sustainability of towns and villages as key service centres; and
- ensuring there is access to appropriate public transport.

4.10. The draft strategy does not properly address the issues identified through the SCS (March 2008).

4.11. For these reasons, the draft Core Strategy fails to meet the requirements of both the Planning and Compulsory Purchase Act 2004 and Town and Country Planning (Local Planning) (England) Regulations 2012 in terms of meeting the legal requirements.
5. Policy Compliance

5.1. As set out at paragraph 1.2, the plan has been prepared in advance of formal publication of the NPPF therefore the Council will need to go through a process of cross checking the policies contained within to ensure consistency with the NPPF.

5.2. The following sections of this Statement identify how the draft Core Strategy fails to comply with the guidance contained within the NPPF and how draft policies and issues should be addressed prior to submission of a Publication Draft for formal Examination in Public.

5.3. For the avoidance of doubt, at this stage, we have not provided comments on the specific wording of draft policies as the overall strategy for growth needs to be revised before the specific details can be considered.

5.4. With regards the presumption in favour of sustainable development contained within the NPPF, we note that the Planning Inspectorate has produced draft model wording for how the presumption might be incorporated into development plans. We enclose a copy of this draft model wording at Appendix 6.

5.5. In addition to the amendments to the draft Core Strategy sought be the following sections of this Statement, the Inspectorate's model wording regarding the presumption should also be included within the overall plan.
6. The Evidence Base

6.1. Section 2 (paragraphs 2.15 to 2.36) of the draft Core Strategy provides details of the evidence base documents that have informed the proposals.

6.2. We set out below comments on some of these documents and the extent to which they can be relied upon in informing the level of and direction of growth across the Borough during the plan period.

**Strategic Housing Market Assessment (SHMA)**

6.3. The Council's SHMA was undertaken during 2008 and adopted in December 2008. It focuses on the type and tenure of housing available in the Borough; where there is a surplus or shortfall of housing (and of which type); and, what actions should be undertaken in the future to ensure that there is sufficient suitable housing in the Borough to match the needs and aspirations of residents. It also considers affordability issues.

6.4. Paragraph 2.16 states that the SHMA will be updated regularly to ensure any major changes in situation are considered.

6.5. The SHMA was produced at a time when market conditions were very different and given it has a base date of 2008, we question how reliable the information contained within is, and the validity of this (certainly in the earlier years of the plan) if the Core Strategy proceeds to adoption in 2013 and if there is no immediate intention to undertake a review and/or updated assessment.

6.6. In 2008, the affordable housing need was calculated to be in the order of 264 dwellings per annum, which is higher than the current North West Regional Spatial Strategy (RSS) annual housing target for the Borough as a whole. This took into account the need to address an existing backlog at that time and meeting newly arising need (factoring in the number of available housing units at that time).

6.7. In policy terms, the position has significantly changed since 2008, not least as the findings of this study followed a period of housing restraint and coincided with the adoption of the RSS (September 2008), which increased the housing target for the Borough as a whole.

6.8. Since then, there have also been a number of permissions granted and new affordable housing units provided. Additional study work has been undertaken by the Council assessing the overall housing requirement for the Borough and clearly, the affordable housing requirement is just an element of this. On balance, the overall need for affordable housing might not have significantly changed but this is clearly an important consideration when planning for growth, in not only meeting market but affordable and other housing needs. We
would note that there has been limited delivery of housing, in particular, affordable housing particularly in the past 4 years and therefore we would anticipate that the need for new housing and affordable delivery has increased further.

6.9. On this basis, given the base date of the SHMA this should at least be reviewed to validate the current findings and in advance of the draft Core Strategy being finalised. To this end, we are not satisfied that the strategy for housing growth and delivery is based on a robust evidence base and therefore the Core Strategy in so far as housing matters are concerned, fails to meet the tests of soundness.

**Strategic Housing Land Availability Assessment**

6.10. The SHLAA (published in November 2009) is a culmination of work undertaken between 2007 and 2009 in seeking out potential housing opportunities and evaluating their deliverability.

6.11. It identifies a host of potential housing sites, including Lawsonsteads which is being promoted by CEG.

6.12. However, we note that the SHLAA doesn’t include an assessment of any of the land required for the proposed Strategic Extension to Clitheroe (otherwise known as the ‘Standon Estate’ site). Whilst this doesn’t preclude its development, the site has not been assessed on comparable terms with other site opportunities and yet the Council is relying on its development in implementing over 50% of its total housing requirement.

6.13. Again, this raises significant doubt over the justification for the Council’s preferred approach to its development strategy given the lack of available evidence in support of the Council’s preferred choices, contrary to the requirements of NPPF (paragraph 182) and the tests of soundness.

**Housing Requirements Review**

6.14. In November 2011, the Council published a report prepared for them by Nathaniel Lichfield & Partners (NLP) which assessed what the Borough wide housing target ought to be, based on consideration of a number of local and sub-regional factors, including demographic changes and links between housing and employment growth. A number of scenarios (agreed with the Council) were tested in deriving a locally based housing figure.

6.15. The report concluded that, taking into account constraints on delivery, the dwelling requirement for the Borough should be between 190 and 220 dwellings per annum (2008 to 2028, this being the proposed timeframe for the Core Strategy). It suggested that this level of housing development would result in very limited (if any) changes in the size of the local workforce (i.e. it was a proposal based on limited or neutral economic growth).

6.16. Furthermore, it advised against the figure falling below this range on the basis that this would
be unlikely to deliver a suitable level of affordable housing or allow the Borough to realise any economic growth objectives without potentially encouraging unsustainable patterns of growth.

6.17. In advance of this report being published by the Council, CEG had commissioned its own study undertaken by Justin Gardner Consulting (JGC) (dated April 2011) in anticipation of this work being undertaken by the Council and what implications it might have on the Core Strategy advancing.

6.18. Similar to the approach adopted by NLP, this assessed a number of scenarios based on assumptions around demographic change and employment growth. The findings demonstrated that, in order for employment levels to remain at their 2010 position would require around 270 additional homes to be provided per annum during the plan period. JGC advised that this should be regarded as a minimum target if the Council is not to see significant changes which could affect the viability and vitality of existing services. A projection based on employment growth in line with the forecasts produced by the Regional Economic Forecasting Panel increased this requirement to 310 additional homes per annum.

6.19. Mindful of the difference in the findings of the report produced by JGC and the importance of the NLP work in determining future levels of housing growth in the Borough, on behalf of CEG we submitted a detailed representation challenging the findings of the NLP report. A copy is enclosed at Appendix 6.

6.20. Following consultation on the NLP report, the outcomes were reported to Members at committee at a Special Meeting of the Planning Committee (2 February 2012), including a response from NLP on some of the key comments received. There has not been a formal opportunity until now to comment on NLP’s response on the basis that, at that meeting, Members resolved to proceed with a target figure of 200 dwellings per annum for the purpose of progressing the emerging draft Core Strategy to its next stage.

6.21. We therefore continue to have a number of significant concerns regarding the Council’s proposed housing target and whether the level of planned provision is sufficient, mindful of the findings of the NLP and JGC work. Until and unless the differences in conclusions can be rationalised, the reliability of the NLP report as an evidence base document in support of the Council’s emerging Core Strategy remains in doubt. Again, demonstrating that the draft Core Strategy has not been justified in demonstrating that sufficient levels of growth are being planned for.

Infrastructure Plan

6.22. The Local Infrastructure Plan is in effect an audit of existing infrastructure with a commentary regarding proposed new infrastructure planned, including what might be required as a result of proposals in the Core Strategy.

6.23. In particular, the plan identifies a requirement for 60 additional affordable homes per annum
across the Borough.

6.24. It also suggests that new primary school places might be required as a result of the proposed Standen Strategic Extension at Clitheroe, and development in the other key service centres of Whalley and Longridge. However, the figures contained in Table 4 (Page 45) are not clear in so far as how the estimated figures have been derived and what assumptions have been made in informing the projections. On this basis, the plan does not conclude either way how (and if) new school places should be delivered and, as a result, it is not clear how the delivery of new school places (if required) relates to planned levels of housing growth in the key settlement areas through the Core Strategy.

6.25. Further work is required by the Council in partnership with the education authority (Lancashire County Council) to assess the forecast position in each of the key settlements based on the proposed levels of housing growth, in ensuring that the Core Strategy will deliver sustainable patterns of development. To this end, until this work has been undertaken, there is uncertainty as to how the Core Strategy responds to the infrastructure plan and whether the approach being taken is justified.

**Ribble Valley Housing Needs Assessments**

6.26. The Council has undertaken a series of Housing Needs Surveys across the Borough since 2004. However, the methodology for undertaking these simply involves asking existing households questions on the type and tenure of housing which individuals would be looking for in the next few years. As such, the findings are not necessarily representative of actual housing needs in a particular area. This is evident in the latest Whalley Housing Needs Survey which produced a very low response rate. Of those that did respond, it was evident that residents did not fully understand the purpose of the survey and sought to use this as an opportunity to object to the principle of further development in that specific area.

6.27. Therefore, the results of the Housing Needs Surveys cannot be relied upon when determining the spatial distribution of growth through the Core Strategy. They should only be read alongside the overall findings of the Council's Strategic Housing Market Assessment (2006), but, as set out above, there is uncertainty as to the robustness of the SHMA itself when it comes to policy formulation within the Core Strategy.

**Ribble Valley Settlement Hierarchy**

6.28. The Settlement Hierarchy is designed to assist in making decisions about the scale and future location of new development across the Borough.

6.29. In line with comments provided above with regards other studies, this document might also be updated to reflect more recent population / household figures and the availability of shops, services and public transport, in particular in the key settlement areas including Whalley.

6.30. Nonetheless, it is worth noting the findings of this study in particular, the ranking of Whalley in
terms of availability of and access to services and public transport and therefore its suitability for accommodating new development in helping meet the future growth needs of the Borough.

6.31. As highlighted in our previous representations, the former Joint Lancashire Structure Plan (Adopted 2005 but later superseded by adoption of RSS) identified Whalley alongside Clitheroe and Longridge as a Key Service Centre and focus for development. This was to help promote regeneration and support its role as a public transport hub for the surrounding villages and rural area.

6.32. The findings of this study (in the context of Whalley) appear to have been overlooked in the context of formulating the Council’s draft Core Strategy and, in particular, the preferred direction of travel for future housing development.

6.33. Whilst the evidence base document itself is valid in broad terms, the Council’s Core Strategy disregards the settlement hierarchy outlined and, on this basis, does not meet the ‘justified’ test of soundness in accordance with the NPPF.
7. Response to Consultation Draft Core Strategy

Plan Period

7.1. We note that the Council is continuing to define the plan period as 2008 to 2028. As set out in Section 3 of our previous representations (Appendix 4), it is not clear why the Council has rolled back the start date of the plan to 2008 when adoption of the Core Strategy is unlikely to take place until 2013.

7.2. Whilst it is important that for the purpose of identifying a five year housing land supply that past requirements and delivery rates are factored in when updating the baseline position, the plan itself should be drawn up to cover an appropriate time scale in accordance with paragraph 157 of NPPF.

7.3. If successfully adopted in 2013 the plan will still cover a minimum 15 year time horizon, however, given that there is an adopted local plan in place which alongside the North West Regional Spatial Strategy (RSS) forms the current statutory development plan, it seems unnecessary to be including in the plan for a period of time which has now largely passed and which has significant implications on the levels of growth required and delivery strategy put in place for the remaining plan period.

7.4. Given this and as set out in our representations last year, it would be more appropriate to set the plan period from now (i.e. 2012) and ensure it is forward looking for at least the minimum amount of time (15 years), and beyond.

7.5. As it currently stands, the plan does not meet the tests of soundness with regards it being effective and consistent with national policy.

The Core Strategy Vision / Strategic Objectives

7.6. The proposed Core Strategy Vision and Strategic Objectives seem to mirror the vision set out in the Council's SCS (March 2008), at the forefront of which is the need to promote sustainable patterns of development which meets identified needs.

7.7. However, we note that those elements relating to economic development are not clear on whether the Council is planning for growth or seeking to manage existing employment levels. As set out in Section 5, the Housing Requirements Review evidence base document seems to promote a level of housing growth intended to parallel a 'managed' economy rather than growth. However, this is contrary to the policies contained within the NPPF which is quite clear that local authorities should be planning for economic growth.

7.8. On this basis, the strategic vision, objectives and subsequent policies contained within the
draft Core Strategy need to be clearer in terms of the Council's intentions in this regard and should be planning for growth in line with the NPPF.

**Key Statement DS1: Development Strategy**

7.9. This seeks to locate the majority of new housing development into a single strategic extension to Clitheroe, with some (limited) development planned in other main urban areas.

7.10. The draft policy states:

> Overall, the scale of planned housing growth is to 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…

> Development that has recognised regeneration benefits, is for identified local needs or satisfies neighbourhood planning legislation, will be considered in all of 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.'

7.11. Paragraphs 4.3 to 4.11 seek to justify the proposed development strategy in terms of how it has been derived (pursuant to the Regulation 18 (25) consultation) and what effect it has on the need for development in settlements across the Borough.

7.12. However, notwithstanding the points raised at the time of the Regulation 18 (25) consultation in July/August 2011 (see our statement at Appendix 4), we remain of the view that the proposed strategy does not reflect the evidence base and findings of work undertaken by and on behalf of the Council in formulating its strategy. On this basis, the proposed plan is neither justified nor likely to be effective and it is certainly not consistent with the overall aims of the NPPF.

7.13. Further information on our main concerns is set out in the following paragraphs:

**Housing Target**

7.14. The development strategy is underpinned by a total housing requirement of 200 dwellings per annum (or 4,000 dwellings over the plan period 2008-2028).

7.15. As set out in Section 5 of this Statement, a number of issues regarding the evidence base supporting this figure have been identified not only on behalf of CEG but also other third parties. Based on the Council's strategic vision with regards economic development and overall need to promote sustainable patterns of development, there is a strong case in favour of a higher annual housing figure, notwithstanding that it should be treated as a minimum in any event.

7.16. To plan for economic growth, the evidence presented by JGC recommends a target of 310 dwellings per annum, or 6,200 dwellings for the plan period. We therefore object to the
overall number of houses being proposed which will constrain economic growth and not meet the housing needs identified in the Council’s own evidence base.

7.17. Further details are set out at paragraphs 7.40 to 7.55 below.

**Housing Distribution**

7.18. The distribution of growth to individual settlement areas (in so far as Clitheroe, Whalley and Longridge) is based on apportionality to the existing population of these settlements. However, the population figure has been calculated relative to Parish boundaries (rather than ward boundaries).

7.19. The Council’s justification for this is that ward population estimates and projections are based on the 2001 Census (allowing for births, deaths and net migrations), but do not take into account the number of new properties that may have since been built in each ward since then. Conversely, the Parish calculation takes into account the number of taxable domestic properties on the CTAX database as at October 2011. An occupancy rate (2.41 per dwelling) has been applied to the number of households identified within the parish in deriving the estimated population figure. This occupancy rate is reportedly derived from census data used by Lichfield Consultants but it is not clear whether this is a locally derived figure and how robust it is, notwithstanding how it is then applied.

7.20. Whilst there might be some justification in the use of parish rather than ward boundaries, there does need to be consistency in approach. It raises a number of questions including how the parish council CTAX household figures relate to the census data (i.e. whether this is still 2001 data); how relevant the occupancy rate being applied is (is this a locally derived rate); and, whether the CTAX figures reflect the latest 2008 census projections.

7.21. There is also a need to avoid potential double counting where a parish boundary extends to include smaller rural settlements i.e. the relationship between Whalley and Mitton and whether the overall level of housing growth targeted in Whalley is increased to reflect the inclusion of Mitton and parts of Billington, both of which are being afforded their own housing ‘pot’ by virtue of the ‘other settlements’ category. In addition, given that Whalley acts as a Key Service Centre for its rural hinterland and extends to include parts of Barrow and Wiswell, any apportionment of growth should be adjusted accordingly (again from the ‘other settlements’ pot).

7.22. We would note that the options presented in July 2011 referred to the population of Clitheroe as 15,000, Longridge as 8,000 and Whalley as 3,000. It would appear that these figures have since changed, adding further uncertainty to the reliability of the figures being cited by the Council.

7.23. It would be helpful if the Council could provide a detailed breakdown of those schemes (total number of dwellings) already completed and/or planning permission has been granted within
each settlement area (based on the parish boundary) as referred to in the table at Paragraph 15.2 (Appendix 2) of the draft Core Strategy. In particular, with regard to Whalley and the resulting impact this has on future housing provision in the area.

7.24. Notwithstanding our concerns about the datasets being referred to, it remains our view that existing population counts should not form the sole basis of decisions about future patterns of development. Other factors need to be taken into account, including the role of existing settlements (identified in the Settlement Hierarchy study); their ability to accommodate future development (reflecting on the findings of the SHLAA); levels of access to existing services, facilities and public transport (as identified in the Settlement Audit) and, the findings of up to date housing needs studies and other evidence base research.

7.25. Furthermore, we question the appropriateness of planning for growth in all of the rural settlements and the relevance of apportioning an average of 35 dwellings per settlement (over 32 settlements). This totals 1,120 dwellings outside of the main urban areas of Clitheroe, Whalley and Longridge. This approach appears arbitrary and does not relate back to rural settlement populations, or their need for and/or ability to accommodate future development.

7.26. As set out in our previous representations (paragraph 3.40 of the Statement contained at Appendix 5), not all of the smaller settlements in the rural area will be able to accommodate growth due to environmental constraints. For example, Billington and Wilpshire are both identified as key settlements within the Borough (based on Policy G2 of the adopted Local Plan, 1998); however, both are heavily constrained by Green Belt. We note that no review of Green Belt boundaries is proposed by virtue of draft Policy EN1 (Green Belt).

7.27. The development and expansion of some of the smaller settlements may not represent sustainable development, not least given the emphasis in NPPF regarding the need to consider housing growth alongside economic factors and marry areas of opportunity and need.

7.28. As a result of the approach being taken forward by the Council, the key settlement of Whalley (recognised as such historically in the former Joint Lancashire Structure Plan, the adopted Local Plan and in more recent evidence base documents) is being afforded only a limited amount of growth and yet this is one of the top three most sustainable settlements in the Borough.

7.29. Not only does Whalley act as a key service centre for residents within the village, it also serves its rural hinterland. It has good access to shops, services and public transport; is a source of local employment; and, is capable of accommodating new growth without detriment to the characteristics that underpin why it is an attractive place to live and work. Therefore, it is a sustainable location for new development. It also has good links to existing and proposed employment provision at Barrow. However, these factors are not reflected in the
Council’s draft Core Strategy.

7.30. We therefore object to the overall methodology for calculating the apportionment of housing and the resulting housing requirement for Whalley which is a key settlement area.

7.31. Further details on what we consider should be the housing requirement for Whalley are provided at Section 7.52 below.

Relevance to the Evidence Base

7.32. As referred to above, the Council’s evidence base supports development in the three key settlements of Clitheroe, Whalley and Longridge which are recognised as sustainable locations for new growth. Using population counts as the sole determining factor in distributing new housing across the Borough is contrary to the findings of the Council’s evidence base.

7.33. The Council relies heavily on the findings of the Sustainability Appraisal options report (paragraph 4.5 of the draft Core Strategy) and how this has influenced the decision to proceed with a single urban extension to Clitheroe and limited growth elsewhere.

7.34. However, having reviewed the options appraisal and assessment of each of the eight growth options tabled to date by the Council, the key messages arising are:

- The benefits to focusing new housing growth in or adjacent to existing settlement areas, with access to employment, local services and public transport and in promoting sustainable patterns of development;

- Growth in each of the three urban areas is likely to result in a requirement for some new infrastructure (be this highways, education, drainage etc), the extent of which is dependent upon the scale of growth proposed;

- A number of the smaller settlements are heavily constrained by environmental designations and/or suffer from a general lack of access to services, facilities and public transport. As such, any significant growth in the more rural parts of the Borough risks being unsustainable; and

- Other than localised traffic concerns which can be readily mitigated, Whalley is recognised throughout each of the options as being relatively unconstrained and able to accommodate new development.

7.35. On this basis, it does not follow that the Council’s preferred strategy is to promote a single urban extension to Clitheroe and limit development elsewhere, particularly in Whalley which is recognised as a sustainable centre and suitable location for development in its own right.

7.36. Given the lack of evidence supporting the Council’s approach, we can only surmise that this
has been a political decision rather than one founded on robust evidence base and good planning principles (supported by the NPPF).

**Proposed Standen Strategic Extension**

7.37. In terms of the proposed strategic extension, if the overall housing requirement for the Borough is tied to economic growth and therefore is larger, subject to its spatial distribution and availability of sites in Clitheroe, there might be a case for bringing forward an urban extension to Clitheroe. However, based on available evidence and conflicts in the draft Core Strategy between the Council’s economic ambitions and need for housing, this case has not been demonstrated.

7.38. We would also make the following specific comments:

- It has not been demonstrated that the proposed strategic site is suitable, developable or appropriate for development and therefore whether it is capable of delivering the proposed level of housing growth planned (1,040 dwellings). There is no evidence in the Council’s SHLAA or any other documents to suggest this development option and only limited references to what development of this site can achieve through the Sustainability Appraisal.

- It has not been demonstrated how the provision of 1,040 dwellings in this single location relates to identified housing needs and if the proposed scale of development here will be to the detriment of housing and affordable housing delivery required to meet local needs elsewhere.

- The proposed scale of development has been reduced from that identified at the Issues and Options stage (from 1,500 dwellings to 1,040). Whilst this reduction is designed to address environmental constraints identified in the Sustainability Appraisal, there doesn't appear to be any rationale behind the proposed quantum of development overall. Particularly as the Council’s methodology for apportioning development to other settlement areas is tied to their existing (reported) populations.

- Appendix 2 of the draft Core Strategy provides further information regarding the assessment of how residential development is to be distributed. The table at paragraph 15.2 (page 133) calculates a pro rata requirement of 1,670 dwellings for Clitheroe (proportionate to its population) but having made a deduction for provision in unspecified smaller rural settlements first (and assuming the total requirement is 4,000 dwellings over the plan period).

- However, if calculated strictly based on population apportionality (and assuming a total requirement of 4,000 dwellings over the plan period), the actual figure for Clitheroe would be 2,320 dwellings. This assumes the Council’s figures with regards the existing population are correct (expressed on page 134) and that the 4,000 requirement figure is
unchallenged.

- It is not clear why the Council is prioritising an allowance for each of the smaller settlements in the rural area before calculating the requirement for Clitheroe. This approach sits completely contrary to the evidence base which identifies Clitheroe as the largest settlement, the principal market town and a sustainable location for new growth.

- In any event, the Council goes on to report in the table on page 133 that there are 282 dwellings committed (either completed or with planning permission) therefore, based on the original figure of 1,670 dwellings and a planned extension of 1,040 dwellings, there is a residual requirement in Clitheroe for 348 dwellings. Not only are the figures confusing but it is evident that there is no correlation between them, in particular, how the 1,040 requirement for the extension relates to the 1,670 (or residual 1,388) figure and how any of these figures relate to the Council’s evidence base and identified housing need in Clitheroe.

- Furthermore, it is unclear how a figure of 1,040 for the Strategic Extension relates to the potential capacity of the site when additional uses are planned in.

7.39. Taking all of these considerations into account, the plan fails to satisfy the tests of soundness required by the NPPF, in particular, in terms of its justification, effectiveness and consistency with planning policy.

**Key Statement H1: Housing Provision**

7.40. As set out above (paragraphs 7.1 to 7.5) we disagree with the proposed plan period starting in 2008 and what effect this has on planning for growth. In addition, in our view the proposed housing target for the Borough should be higher than 200 dwellings per annum during the plan period (notwithstanding the need to treat this as a minimum target in any event).

7.41. We would draw your attention to the comments we submitted in response to the policy consultation on the Housing Numbers Review report produced by NLP (Appendix 5). The covering letter set out our overall concern that in taking forward the recommendations of the NLP work, the Council is planning for limited (if any) economic growth and is going to find it more difficult to deliver a suitable level of affordable housing to address local housing needs. Enclosed with the letter was a briefing note provided by JGC (on behalf of CEG) setting out details comments on the technical work that has been undertaken.

7.42. For the reasons set out in the correspondence at Appendix 5, the future annual housing requirement for the Borough should be in the order of 270 and 310 dwellings (factoring in the shortfall in completions between 2008 and 2011) across the plan period and in line with the findings of the JGC work.

7.43. **As an absolute minimum the target should be 210 dwellings per annum**, to reflect the findings
of the NLP work, requiring an overall minimum total of 4,200 dwellings over the plan period.

7.44. To this end, Table 1 at Appendix 7 set out the implications of adopting this housing target (i.e. 210 dwellings per annum) on apportionment to the settlements and based on the following assumptions:

- the plan period remains as 2008 to 2028;
- the household and population figures cited by the Council at Appendix 2 of the draft Core Strategy are taken as read;
- the Council’s proposed strategic extension to Clitheroe is factored in (as proposed) and provides up to 1,040 dwellings;
- the apportionment of an average of 35 dwellings per settlement (across 32 settlements) is also accepted (including the transfer of 200 dwellings from Longridge into the other settlements ’pot’); and
- the number of houses already completed and/or permission has been granted is also taken as read.

7.45. Based on the Council’s proposed methodology (which we don’t accept), the level of housing required in Whalley increases to 268 dwellings.

7.46. However, applying the findings of the JGC work the apportionment to Whalley increases further to between 424 and 528 dwellings (see Tables 2 and 3 at Appendices 8 and 9 respectively).

7.47. These figures should be treated as a minimum on the basis that this approach does not reflect the Council’s persistent under delivery of housing since 2008 (against the current adopted RSS target of 161 dwellings per annum) and in any event, the overall target is not a maximum and can be exceeded where housing is being brought forward to satisfy demand. At present, the Council’s approach has limited regard to the housing requirements of the NPPF in terms of the need to plan, monitor and manage housing delivery.

7.48. Furthermore, no information has been provided in terms of how it is envisaged that planned growth will be delivered and in what timeframe (i.e. using a trajectory looking at the 0-5, 6-10 and 11-15 year periods).

7.49. As stated, we do not accept the disproportionate amount of housing being afforded to Whalley as this approach is predicated solely on the relationship of new housing to existing households/population. No regard has been given to the fact that Whalley is the third largest settlement in the Borough and one of the most sustainable locations for new development.

7.50. Our previous comments (Appendix 4) at paragraph 3.58 onwards, set out what we
considered to be a more proportionate and sustainable approach to housing distribution. At that time, the Council’s overall housing target was still to be determined and therefore the approach put forward assumed a figure appropriate at that time. However, the percentage distribution to each of the settlements remains relevant.

7.51. For ease, we have updated our previous Table 2 (provided in our Statement at Appendix 4) to reflect the proposed housing requirement for the Ribble Valley (200 dwellings per annum) and how this relates to CEG’s preferred distribution of growth to the main settlements. For the purpose of this exercise, this does not take into account the fact that the overall target for the Borough should be higher in line with the findings of the JGC work undertaken on behalf of CEG.

7.52. Table 4 at Appendix 10 summarises the approach advocated on behalf of CEG, reflecting on the requirement for a minimum of 4,200 dwellings between 2008 and 2028. This results in between 1,050 and 1,260 dwellings being apportioned to Whalley.

7.53. Whilst some of this requirement will already have been met by recent applications for planning permissions (and completions in recent monitoring years) and therefore the actual figure might need to be altered slightly, the overall apportionment of housing better reflects the status of Whalley as a Key Service Centre, its role in serving its rural hinterland (potentially utilising growth that would have otherwise been apportioned to less sustainable rural settlements) and its suitability as a location for future housing growth in line with the presumption in favour of sustainable development set out in the NPPF.

7.54. However, there is a need to factor in past under delivery of housing and whether the overall housing target should actually be higher as put forward by JGC.

7.55. Further information is provided in our previous statement at paragraphs 3.63 to 3.75 (Appendix 4) with regards the overall suitability of Whalley for increased housing growth and the suitability of the Lawsonsteads site in meeting housing and other infrastructure needs.

**Key Statement H3: Affordable Housing**

7.56. The Council’s draft policy carries forward the approach to securing affordable housing as set out in the Council’s Addressing Housing Needs Statement (date) [check] i.e. seeking to secure 30% provision on sites of 10 or more dwellings (or 0.5 Hectares or more irrespective of the number of dwellings) in Clitheroe and Longridge, with the threshold reduced to 5 or more dwellings (or sites of 0.1 Hectares or more) in all other locations.

7.57. The draft policy states:

> 'The Council will only consider a reduction in this level of provision, to a minimum of 20%, only where supporting evidence, including a viability appraisal fully justifies a lower level of provision to the Council’s satisfaction'.
7.58. Whilst the delivery of affordable housing is essential to secure a balanced housing market across the Borough, as recognised in the Council’s SHMA (December 2008) at the last paragraph on page 102 within Section E (12: Conclusions and Recommendations), in setting thresholds the Council should take into account the economic viability of developments in current housing market conditions. This is reaffirmed through the NPPF (paragraph 173).

7.59. To date, no work has been undertaken to consider the viability of affordable housing, in particular, to reflect the need for developments to balance the costs of affordable housing delivery against other infrastructure requirements i.e. education, highways etc. The Council should be undertaking a robust assessment of viability based on up to date housing needs surveys before advancing with draft Policy H3 further.

7.60. We have previously commented with regards the proposed requirement for provision of elderly person’s accommodation on eligible sites (see Appendix 4). However, to reaffirm our position this policy requirement has not been underpinned by any viability assessment and is therefore contrary to the requirements of the NPPF.

7.61. Whilst there is some evidence to suggest that the Council has an ageing population and a requirement to provide smaller elderly and extra care accommodation, the Council should provide for flexibility in terms of the types of development to come forward that might satisfy this requirement.

7.62. Until this work has been undertaken, draft Policy H3 is not justified by the Council’s evidence base and therefore fails to ensure that the local plan can be found sound.

**Key Statement DMI1: Planning Obligations**

7.63. The Council’s draft policy seems to favour the current S106 contributions/obligations regime over the introduction of the Community Infrastructure Levy. However, the wording of the draft policy highlights a complete lack of understanding of what the infrastructure requirements of the Borough might be (reaffirmed upon review of the Local Infrastructure Plan evidence base document) tied to growth. Furthermore, as currently drafted, the wording suggests that the Council will look to pool contributions for new infrastructure (which in itself is not necessarily tied to the specific impacts of a development), an approach which sits contrary to the Community Infrastructure Levy Regulations (2011) and need to separate out general infrastructure requirements with mitigation of impacts associated with a particular development.

7.64. The draft policy does not appear to be founded on any robust evidence in support of the approach and therefore is neither justified nor likely to be effective overall.

**Section 9: Standen Strategic Site**

7.65. Earlier in this section we have set out our concerns with regards the proposed Standen Strategic Site, primarily with regards its deliverability and the lack of evidence base
information available to support its development and in ensuring that the proposed approach is justified in examining the soundness of the draft Core Strategy.

7.66. Notwithstanding whether it is deliverable or not, are primary concern is that of its effect on the delivery of development in other key settlements, namely Whalley, and how the Council’s distribution of the residual requirement for growth has been calculated. It is our view that the approach being adopted will undermine delivery of sustainable patterns of development elsewhere in the Borough, in particular, the ability to address local housing needs.

7.67. Aside from the strategic concerns raised, with regards the principle of its development and ability to accommodate a mix of uses including employment, community uses, local retail and services provision, no information is provided as to how a mixed use development can be achieved and what effects this might have on the centre of Clitheroe and environmental considerations.

7.68. To this end, we do not consider that the proposed extension has been properly justified and there is no certainty that this site will come forward in order to deliver growth and meet the Council’s overall strategic vision for the area. Therefore, it has not been demonstrated that the plan will be effective and how its growth strategy meets with the requirements of the NPPF.

**Key Statement DMG2: Strategic Considerations**

7.69. Draft policy DMG2 seeks to ensure that future development comes forward to meet the overall spatial vision of the Core Strategy. Whilst the principle of this approach and need for such a policy is accepted, the draft wording needs clarification so that it is clear when/if sites either within or adjoining existing settlements will be considered appropriate. In doing so, it would be helpful if the Council can clarify (or depict on the proposal maps) what it defines as each settlement and/or the main built up areas, on the basis that the overall levels of growth being promoted will inevitably require greenfield development on sites outside current settlement limits. There should be a clear criteria based policy addressing how such sites will be assessed against such boundaries.

7.70. It might also be helpful to separate out the criteria based approach to determining development proposals on sites outside settlement areas, so that this isn’t confused with and/or applied to development proposals that will inevitably occur on current settlement perimeters.

7.71. The proposals map will also need to be clear in terms of those areas of land which are designated open countryside and are or not eligible for development. In this regard, we note that the Council has published proposed changes to the proposals map in parallel with the draft Core Strategy. We have not commented specifically on the changes illustrated but the Council will need to have regard to our comments with regard this draft policy and DMH3 (below) in taking the proposals forward.
Key Statement DMH3: Dwellings in the Open Countryside

7.72. The comments relating to draft policy DMG2 equally apply here also in so far as the need for greater clarification as to the circumstances in which the criteria of this draft policy will apply.

7.73. The proposals map will also need to be clear in terms of those areas of land which are designated open countryside and are or not eligible for development. In this regard, we note that the Council has published proposed changes to the proposals map in parallel with the draft Core Strategy. We have not commented specifically on the changes illustrated but the Council will need to have regard to our comments with regard this draft policy and DMH1 (above) in taking the proposals forward.

Section 11: Monitoring

7.74. No information has been provided with regards how the deliverability of the plan is going to be measured, in particular, how the Council intends to identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against the proposed housing target, including any additional buffer to account for under delivery in the earlier years of the plan.

7.75. There is also no information regarding the expected rate of housing delivery (i.e. a trajectory), in particular, demonstrating the phasing for delivery of the proposed Standen Strategic Extension and in parallel, development in other main settlements in meeting local needs (notwithstanding the five year requirement).

Glossary

Five Year Supply

7.76. The document includes a helpful glossary which provides a definition of *inter alia* five year supply. It states:

'Each local planning authority is required to demonstrate a five year supply of land for housing. Ribble Valley is required to provide 161 residential units each year and therefore is required to demonstrate that 805 units (161 x 5) can be provided. If a five year supply cannot be demonstrated then it becomes difficult to resist applications for residential development, even if they are not suitable'.

7.77. Given that the five year housing target is dependent upon a number of factors, including the overall Borough requirement and recent rates of delivery. Given this and that clear definitions are provided in the NPPF, it would be simpler to keep the explanation of five year supply to the first line only with reference made to the NPPF for further information.

Planning Policy Statements (PPSs)

7.78. In line with the recent publication of the NPPF, all references to PPSs within the glossary and remainder of the document should be removed.
8. Summary

8.1. In summary, it has been demonstrated that the draft Core Strategy is neither legally compliant or meets the tests of soundness in the NPPF.

8.2. There are a number of areas requiring further review, including:

- the robustness and reliability of the Council’s evidence base;
- how this affects the overall housing target for the Borough;
- the apportionment of housing to settlements relative to existing population, which ignores the fact that Whalley and Longridge are key service centres, play an important role in terms of providing access to services, facilities and public transport and are, alongside Clitheroe, the most sustainable locations for new growth;
- the justification and deliverability of the proposed scale of housing in 'other settlements';
- the suitability, deliverability and available evidence supporting the promotion of the Standen Strategic Extension;
- the Council's proposed approach to planning obligations, including the need for new infrastructure, how this relates to the proposed levels of growth and delivery of affordable housing; and
- the need for clearer policy guidance on a host of issues, including when sites in the open countryside will be acceptable for development i.e., in terms of their relationship to current settlement boundaries and how/if they are defined.

8.3. To this end, this Statement has demonstrated that the Council should revisit its proposed strategy prior to proceeding to the publication stage in advance of formal Examination in Public and adoption.
Forward Planning Draft Core Strategy Consultation  
Council Offices  
Ribble Valley Borough Council  
Church Walk  
Clitheroe  
BB7 2RA

20 October 2010

Dear Sirs

Ribble Valley Local Development Framework: Consultation on the Core Strategy 2010

We write on behalf of [Redacted: Company Name] to submit representations in response to the Council's Core Strategy (Regulation 25) Consultation.

As a property investment and development company, we are promoting land at Lawsonstead Farm, east of Clitheroe Road in Whalley for residential and ancillary uses (see enclosed Site Location Plan).

This site has been subject to assessment in the Council's Strategic Housing Land Availability Assessment (SHLAA) and, more recently, formed the basis of discussions with officers and Members. The site's development will help meet the future needs of Whalley and ensure sustainable growth in the Ribble Valley, with a focus on creating and underpinning vibrant key service centres.

It is against this context that we have reviewed the draft Core Strategy and submit our representations to the Regulation 25 draft strategy on the enclosed forms.

Key to the overall strategy is the recognition that Ribble Valley Borough Council has to ensure future growth and development is delivered in a sustainable way that meets local needs. The Core Strategy is an important document to help direct investment to meet the identified need for residential and economic growth. The Borough faces a number of challenges in this regard and we are keen to assist the Council in the delivery of their Strategy and overall Vision for the Borough.

We trust our comments will be taken fully into account in the preparation of future drafts of the Core Strategy.

Yours faithfully

Enc: Comment Forms  
Site Location Plan

cc: [Redacted: Email Address]
CORE STRATEGY CONSULTATION:
(Regulation 25)
CONSULTATION COMMENT SUBMISSION FORM

The first stage of Ribble Valley Borough Council's Core Strategy is currently out for consultation. If you would like to submit any comments to us regarding the Core Strategy, please fill in this form and return it to us. Comments made will be considered prior to the next formal stage of consultation of the Core Strategy. Further consultation will take place before the plan is finalised.

Completed forms can be returned to Core25@ribblevalley.gov.uk or the address given below. Please ensure that we receive comments no later than **5pm WEDNESDAY 20TH OCTOBER 2010**.

<table>
<thead>
<tr>
<th>CONTACT DETAILS: to be used for all future potential correspondence</th>
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<td><strong>Name:</strong></td>
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Please return all completed forms to the following email address:
Core25@ribblevalley.gov.uk

Or by post to:
CORE STRATEGY CONSULTATION
Forward Planning Development Services
Council Offices
Ribble Valley Borough Council
Church Walk
Clitheroe
BB7 2RA

Please note that as part of the legal requirements of the process we have to make comments received, including the name of respondents, available for public viewing. Addresses and all other personal details will NOT be made public. All comments received will be held on the CORE STRATEGY database in accordance with the Data Protection Act 1998.
Section 2.1: A Spatial Portrait of the Ribble Valley

Paragraph 2.1.5 refers to Clitheroe and Longridge as the 'Key Service Centres' within the Borough. However, Appendix 5 (Glossary of Terms) provides a definition for Key Service Centres and states:

"These are seen as the largest settlements in the Borough. For the purposes of this study this relates to Clitheroe, Longridge and Whalley."

Whalley is the third largest settlement in the Borough by population and has an important role in terms of service provision for the rural area and in diversifying the rural economy.

The former Joint Lancashire Structure Plan (Adopted 2005) and former North West Regional Spatial Strategy (RSS) (Adopted 2006) identified Whalley alongside Clitheroe and Longridge as a Key Service Centre and focus for development. This was to help promote regeneration and support its role as a public transport hub for the surrounding villages and rural area.

The Employment and Retail Study undertaken by the BE Group (2008) also assesses employment and retail provision on this basis.

Whalley clearly is a Key Service Centre as identified in Appendix 5, so paragraph 2.1.5 should also include Whalley when referring to the Key Service Centres in the Borough.
Section 2.3: LDF Evidence Base

We note that the Council has undertaken and is continuing to update a range of evidence base research. In particular, the Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market Assessment (SHMA) assess future housing requirements on the basis of the North West Regional Spatial Strategy (RSS) requirement of 161 dwellings per annum. We note that whilst the RSS has since been revoked, there is continued Council support for this target figure which is to be treated as a minimum rather than a ceiling requirement.

With regard to the BE Group's Employment Land and Retail Study (2008), this forms an important part of the evidence base. We note it identifies that the Borough should seek to identify an additional six hectares of employment land, two hectares of which could be accommodated as an extension to Sidings Business Park. This would help Whalley grow its economic base over the plan period and is supported.

In respect of their findings for the need for additional convenience retail floorspace, we have a number of concerns with the evidence presented as follows.

The report only looks forward to 2018 and not the plan period and bases its analysis on constant market shares. Because of the limited provision of convenience floorspace in the Borough, the majority of convenience spend is lost to stores outside of the Borough. This could be rectified in a sustainable manner through promotion of additional foodstores in the key service centres, leading to a reduction in the need to travel.

This is particularly true in Whalley where there is only one very small store. The study identifies that, of the £60 million available spend in Zone 3 (in which Whalley is the principal town) only £0.03 million is spent in Whalley in 2010. At the same time, £24.3 million is being spent at supermarkets in Clitheroe with approximately £35 million therefore being spent elsewhere outside of the Borough in 2010.

Because the BE Group assume a constant market share, they conclude that there is no need for additional floorspace in Whalley (ie, constant market share increases growth from £0.03m to about £0.037m), yet clearly the evidence identifies that there is a significant convenience spend from residents in the immediate locality (circa £35m) being spent outside of the Borough, a proportion of which could be diverted to support provision of new floorspace in the town in a sustainable way, helping to underpin the service centre.

The Council's Core Strategy should seek to increase the Borough's overall retail market share to well over the current 29% identified by the BE Group, which is very low indeed. This should be reflected in positive planning for additional retail floorspace in the key service centres and in accordance with the advice in PPS4.
Section 3.2: The Core Strategy Vision

CEG supports the Council's overall vision for the Ribble Valley and the need to manage delivery of growth and development with environmental and other historic considerations. A key part of the vision is to support vital and vibrant market towns and villages acting as thriving service centres, meeting the needs of residents, businesses and visitors. For this to be achieved and sustained, the service centres need investment and to be targets for growth to meet the identified local needs.

Paragraph 3.2.6 makes reference to the physical, social, environmental and economic regeneration of Clitheroe, Longridge and Whalley being supported, together with existing retail businesses, whilst also ensuring a high quality retail offer in the key service centres and smaller village settlements. CEG supports the Council's recognition of these factors in planning for sustainable growth and development.
Section 3.3: Strategic Objectives

Paragraphs 3.3.3 and 3.3.4 identify the need to provide sufficient housing to meet local needs, including provision of adequate affordable housing. In order to achieve these strategic objectives, the Council and community must recognise the requirement to identify sufficient land around the Key Service Centres to ensure future development is sustainable and able to address identified local needs. CEG’s interests at Lawsonstead Farm will help achieve these objectives for Whalley and the wider Borough.

Paragraph 3.3.5 recognises that the Council needs to promote employment opportunities to help sustain economic growth and provide jobs near where people live with a balance of land uses. As a consequence, the Council should be seeking to retain existing employment sites, where possible and commercially viable, and promote new provision either on or adjacent to existing sites.

In the case of Whalley, there is the opportunity for provision of additional employment land near to the train station and adjacent to the existing employment provision at The Sidings. The Council should seek to protect and identify this opportunity to help meet local employment needs.

Paragraph 3.3.7 recognises the need to support existing retail businesses whilst improving the current retail offer to ensure the continued vitality and viability of existing retail areas. Although Whalley is a Key Service Centre, it does not have a defined retail core and has a limited convenience retail offer, requiring residents to travel to nearby Clitheroe or Longridge for convenience shopping. In planning for sustainable growth, the Council should encourage and identify some retail development alongside new housing in Whalley to meet local needs. This would accord with the principles of sustainable development as set out in PPS1 and PPS3 and help generate employment in accordance with PPS4.

Paragraph 3.3.9 promotes improved accessibility and service delivery to address rural isolation, including in respect of access to services, support for local employment and affordable housing. In seeking to promote sustainable development and realise this objective, the Council should seek to focus new development into the identified Key Service Centres which have best access to services and facilities including public transport provision, which should be the focus for future investment and improvements.

Some small scale local development is likely to be required in the smaller more rural settlements to meet specific local housing needs, but to deliver the vision, the majority of growth should be focused on the Key Service Centres. A dispersed approach would undermine the principles of sustainable development and the objective of ensuring vibrant Key Service Centres.

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Acknowledgment card sent?
Section 4 Development Strategy

Paragraph 4.1.3 sets out three development strategy options as follows:

"Option 1: Development will be directed towards the service centres comprising Clitheroe, Longridge and Whalley, including the opportunity to expand their existing settlement limits to accommodate residential and employment growth. Limited development will be accommodated through appropriate village growth and/or expansion where appropriate.

Option 2: Longridge will be viewed as a strategic growth area for the Ribble Valley and a focus of development striving to achieve a competitive and sustainable economy, providing opportunities not only for economic development but also for social and environmental improvement.

Option 3: Development in the Borough will be accommodated through the strategic release of sites that can accommodate high levels of development. A number of strategic sites will be released to create opportunities for new local communities and areas of growth whilst supporting the protection of the wider environment for future generations."

All three options are predicated on a requirement for provision of circa 1,500 dwellings. This figure is derived from an assessment of the Council’s housing land supply position as at 31 March 2010, against the former RSS requirement of 2,900 dwellings between the period 2003 and 2021. It takes into consideration completions since 1 April 2003 and commitments (i.e. sites with planning permission either under construction or not started). This represents the residual requirement between 1 April 2010 and 31 March 2021.

[NB: Based on the Council’s 2010 Housing Land Monitor the actual figure is 1,436 and it is this figure that we have used in our subsequent calculations].

On the basis that the Core Strategy is intended to be a plan covering a 15 year period (in accordance with the requirements of PPS3, paragraph 53) and the Council, at Section 6, identifies a housing target of at least 161 dwellings per annum, the reported requirement of 1,500 is incorrect. The actual amount of housing land required for the plan period of 2010 to 2025 based on the RSS methodology is at least 2,080, calculated as follows:

RSS Residual Requirement 2010-2021: 1,436
Additional Annual Requirement 2021-2025: +644 (161 x 4)

Total Requirement 2,080

This should be treated as a minimum requirement (Scenario 1 referred to below).
Section 4 Development Strategy Cont...

This figure still remains uncertain as it relies on delivery of 502 dwellings subject to extant permissions, particularly as the net completion rate during the past seven years (2003-2010) has only been 137 per annum (based on 952 completions) against the annual target of 161. This demonstrates that slippage and other market factors are likely to continue to influence delivery.

A more robust approach is based on the Council's own evidence and support for provision of 161 dwellings per annum during the lifetime of the plan. Put simply, this would require provision of 2,415 dwellings (15 x 161) between 2010 and 2025 (Scenario 2). This is CEG's preferred approach as it reflects the need to plan, monitor and manage housing provision during the full 15 year plan period, reflecting on continued commitment to a minimum target of 161 dwellings per annum.

The approach to the figure of 161 dwellings per annum has been long supported by the Council prior to adoption of the RSS and more recently endorsed by Members at a council meeting on 17 June 2010, since the new Government came to office. The Council's evidence base research is ongoing, however, there is potentially a requirement for more than 161 dwellings per annum based on identified housing needs. This should be considered as part of the Core Strategy.

In any event, we note that in both instances this only represents a plan for future housing provision for the next 15 years but it should be recognised that further housing development in the future will be required beyond then as the population continues to grow.

It is against this context that the following comments are made regarding the apportionment of growth to each of the Key Service Centres and the indicative options set out by the Council.

Overall, CEG supports 25-30% apportionment of new housing development into Whalley (i.e. 604-724 dwellings based on the adjusted minimum overall requirement to 2025).

This represents an alternative approach to development to that currently set out in the Council's Options 1, 2 and 3 and will enable the identified level of growth to be delivered in a more sustainable way.

In order to inform this alternative approach, we have undertaken a desk-based appraisal of the spatial options for growth in each of the main settlements (defined as Clitheroe, Longridge, Whalley, Wipshire and Billington in the current Local Plan, Policy G2). We make the following observations:

- Clitheroe – this is the largest and most central of the main settlements and is a market town in its own right. The area straddles the mainline railway with strategic growth and expansion opportunities primarily to the south and west (given linkages to the town centre) and possibly to the east, all of which are in the open countryside. The town centre provides a range of services and facilities and public transport provision, including a rail link to both Manchester and Preston.

- Longridge – this is the second largest settlement (based on population) and is bordered to all sides by open countryside, with land to the west beyond the settlement boundary forming part of the Preston local authority area. Expansion of the area could be accommodated to the north and east and would serve both the Ribble Valley and the outskirts of Preston but the service centre does not benefit from a rail link.

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Response Ref:

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Section 4 Development Strategy Cont...

- Whalley – this is the third largest settlement (based on population) and is also served by the mainline railway between Manchester and Clitheroe (which provides the settlement boundary to the west). Opportunities for growth are primarily to the north and east in the open countryside (including the Lawsonstead Farm site). It has a range of services and facilities and good public transport provision.

- Wilpshire – land to the north, east and west of the settlement boundary is in the Green Belt. Land to the south is situated in an adjacent local authority area (Blackburn). The settlement boundary is tightly drawn and, whilst Wilpshire does have a train station, there is limited opportunity for the settlement to expand without encroaching into the Green Belt or through growth in Blackburn which would not meet Ribble Valley’s identified need.

- Billington – the settlement is bordered to the east by the main railway line (Blackburn to Whalley) beyond which is Green Belt. Whalley New Road bounds the settlement to the west. Again, the settlement boundary is tightly drawn and has few facilities.

Taking these factors into account and reflecting on the Council's own evidence base which identifies the availability of future housing sites in the key settlement areas, we put forward the following alternative approach to development further to Option 1 presented in the Council’s document. This reflects on a minimum requirement for circa 2,415 dwellings to be delivered between 2010 and 2025 (as set out above).

<table>
<thead>
<tr>
<th>Settlement Area</th>
<th>Amount of Housing Growth (2010-2025)</th>
<th>Preferred Option</th>
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<tbody>
<tr>
<td></td>
<td>Scenario 1 Minimum 2,080 Dwellings</td>
<td>Scenario 2 Minimum 2,415 Dwellings</td>
</tr>
<tr>
<td>Clitheroe</td>
<td>35% - 40% (728 – 832 Dwellings)</td>
<td>35% - 40% (845 – 966 Dwellings)</td>
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<tr>
<td>Longridge</td>
<td>20% - 25% (416 - 520 Dwellings)</td>
<td>20% - 25% (483 - 604 Dwellings)</td>
</tr>
<tr>
<td>Whalley</td>
<td>25% - 30% (520 – 624 Dwellings)</td>
<td>25% - 30% (604 – 724 Dwellings)</td>
</tr>
<tr>
<td>Other Settlements and Rural Areas</td>
<td>15% (312 Dwellings)</td>
<td>15% (362 Dwellings)</td>
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This represents a balanced approach but with a greater focus on Clitheroe and Whalley, as these settlements have the better opportunities for expansion and the creation of sustainable communities, in physical terms, tying in with the existing urban grain and also with the best public transport links including main line rail and other available services.

Cont...
Section 4 Development Strategy Cont...

In meeting the development needs of Whalley, CEG supports the identification of land at Lawsonsteads Farm (Ref: 1F in existing Option 1 and 2H in Option 2) as an 'Area of Search'. As the Council has already identified, this site scored highly in the Strategic Housing Land Availability Assessment (SHLAA) and is a suitable location for a residential extension to the settlement.

The benefits of this sustainable extension will be fully communicated through ongoing liaison with Council officers and the local community. The site is able to contribute to meeting local housing needs both in quantitative and qualitative terms over the short to medium term, providing high quality development whilst respecting the character of the area and environment.

Whalley is a Key Service Centre and has an important role in terms of service provision for the surrounding rural areas. Its growth has the potential to sustain and underpin the economy of the rural hinterland and improve access to housing, services, education, healthcare and employment. It has good transport links to surrounding towns and villages with scope for further enhancement supported by new development.

On this basis, it represents a suitable and sustainable location as a focus for future growth and development. This should be reflected through the apportionment of housing we advocate in the Council's strategy and in order to support future infrastructure provision.

Based on the aims and objectives set out at paragraph 4.1.3 with regard to each of the options, CEG makes the following comments:

• Whilst the principle of focusing development into the Key Service Centres of Clitheroe, Longridge and Whalley is supported, CEG objects to the quantum of development proposed in Option 1 and overall apportionment of growth. An alternative approach (Scenario 2) is proposed based on a minimum of 2,415 dwellings between 2010 and 2025 (as set out above).

• CEG objects to Options 2 and 3 on the following grounds:

  o Both Clitheroe and Whalley form part of the central core of the Borough and their expansion will have a greater positive impact on the surrounding rural villages which they serve.

  o Whilst Longridge is the second largest settlement in terms of population size, it sits on the periphery of the Borough and has no rail link. On this basis, the overall apportionment to Longridge should be carefully managed. Option 2 places too much reliance on Longridge in this regard.

  o Whilst there is likely to be a limited requirement for some new housing development in the smaller villages during the plan period, focusing the majority of new development away from the Key Service Centres does not represent good planning as it is not making best use of and build on existing services, facilities and opportunities to promote sustainable patterns of development. This approach detracts from the Council's overarching vision for the Borough and will affect the ability of the Council to satisfy its strategic objectives. Option 3 is unsustainable.
Section 5: Environment

CEG supports the Council's continued protection of existing areas of Green Belt and Areas of Outstanding Natural Beauty (AONB). In particular, the Borough has large expanses of open countryside around the Key Service Centres of Clitheroe, Whalley and Longridge and, in seeking to promote sustainable growth, the focus of development should be into these areas, negating the need for Green Belt release in the plan period. The Council's proposed development management approach to new development in the open countryside is consistent with PPG2 (Green Belts).

With regard to the Forest of Bowland AONB, CEG also supports its continued protection, conservation and enhancement and the development management approach set out with regard to proposals both with and adjacent to this area. However, the Council should make it clear that its protection and conservation does not preclude new development, and recognise that it can often facilitate the implementation of schemes which secure the longevity and inherent value of an area.

In terms of the approach to Sustainable Development, CEG supports the overall principles which comply with the guidance set out in PPS1. However, with regard to promoting on site renewable energy, as set out at paragraph 5.2.4, the policy wording itself should recognise that the ability to meet this requirement on site will need to be balanced with ensuring that the wider environment is not adversely affected.
Section 6: Housing

In terms of the Council’s statement on ‘Housing Provision’, we offer the following comments:

CEG supports the Council’s continued promotion of provision of at least 161 dwellings per annum. This is consistent with the approach set out in the former NW RSS which was supported by the Council and underpinned by a robust evidence base. This has been endorsed by Members of the Planning Committee on 17 June 2010. The approach is also reflective of the Council’s own evidence base regarding future housing requirements and in line with national forecasts regarding population projections and demographic changes.

However, the Council should clarify that the time period which this minimum target relates is 2010 to 2025, in accordance with the overall time period for the Core Strategy. Based on the preferred option set out, this results in a total requirement of a minimum of 2,415 dwellings (Scenario 2) between 2010 and 2025.

As the Council correctly sets out, it will seek to identify suitable sites for residential development that are deliverable over a five year period, in accordance with the requirements of PPS3, and ensure that sufficient housing land is identified for the full 15 year period and beyond.

With regard to the statement on ‘Housing Balance’, CEG supports the approach set out and recognises that new residential development needs to adequately address identified local requirements.

The Council’s statement on ‘Affordable Housing’ sets out a requirement for provision of 30% affordable housing on a range of sites across the Borough. Whilst the overall principle of this level of provision is supported, the Council’s approach to determining a reduction in the levy is unduly restrictive and does not enable consideration of the implication of other potential planning obligations, i.e. education, in negotiating the overall level of provision. The delivery of sustainable growth in the Key Service Centres will necessitate investment in local services and infrastructure that could affect the ability to deliver as much as 30% affordable housing. This will be a material consideration in the determination of applications and the policy should ensure the flexibility to enable delivery.

In any event, any policy should be underpinned by a robust assessment of the viability of delivering affordable housing in the Borough in accordance with PPS3, paragraph 29. In addition, up to date housing needs surveys which demonstrate the needs of a particular area.

In accordance with the Council’s later statement on planning obligations, the Council identifies that affordable housing provision is a top priority. However, each of the Key Service Centres will have their own infrastructure demands including affordable housing, highways infrastructure, parking, access to health and education. The strategy needs to allow sufficient flexibility for consideration of these factors together to ensure that development can assist meeting local needs in the most effective and sustainable way.
Section 7: Economy

In terms of the Council's statement on 'Business and Employment Development', we make the following comments:

CEG supports the overall approach to promoting land for employment use but the Council should make clear how much land is required. The evidence base suggests that this is in the order of 6 Ha, however, this is not set out in the strategy and unlike the approach taken to identifying potential 'areas of search' for housing, the strategy should explain further how future employment requirements might be accommodated.

Paragraph 7.1.4 identifies that the Key Service Centres of Clitheroe, Longridge and Whalley are the Council's preferred locations for new employment development. CEG supports the approach to directing employment development into the principle settlement areas in seeking to align jobs with homes in key areas.

Following the approach to apportionment as set out with regard to housing, future employment land provision might be accommodated as follows:

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<th>Settlement Area</th>
<th>Core Strategy Requirement (6 Ha)</th>
<th>2010-2025</th>
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<tr>
<td>Clitheroe</td>
<td>35% - 40% (2.1 – 2.4 Ha)</td>
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<tr>
<td>Longridge</td>
<td>20% - 25% (1.2 – 1.5 Ha)</td>
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<tr>
<td>Whalley</td>
<td>25% - 30% (1.5 – 1.8 Ha)</td>
<td></td>
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<tr>
<td>Other Settlements and Rural Areas</td>
<td>15% (0.9 Ha)</td>
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With regard to how future employment development might be accommodated in Whalley, we note that land adjacent to the existing Sidings employment area is identified in the BE Group Employment and Retail Study (2008) as a suitable location for future employment development in Whalley in the medium term.

Overall, in this context, CEG supports draft policy 'DMB1: Supporting Business Growth and the Local Economy' which takes this approach.

In addition and in accordance with PPS4, in planning for future employment development, the Council should provide flexibility for a range of employment generating uses to come forward, aside from the traditional B1, B2 and B8 uses.

CEG supports the Council's statement regarding 'Development of retail, shops and facilities' which seeks to promote development that supports the retail function of the Key Service Centres of Clitheroe, Longridge and Whalley.

Cont...
Section 7: Economy Cont...

In particular, draft policy ‘DMR2: Shopping in Longridge and Whalley’ provided at Appendix 4 recognises the contribution that further retail provision in these areas could make to meeting the service needs of the settlement. As set out previously, Whalley, does not have a defined retail core and has a limited convenience retail offer, requiring residents to travel to nearby Clitheroe or Longridge for convenience shopping.

In planning for the sustainable growth of Whalley, and as set out above in respect of our comments on the BE Group report, the Council should identify further retail development, alongside new housing and employment. Not only does this approach accord with the principles of sustainable development as set out in PPS1 and PPS3, but is also in accordance with PPS4, which recognises that retail is an employment generating use itself and therefore could help support the continued economic growth of Whalley.
Section 8: Delivery Mechanisms and Infrastructure

CEG recognises the importance the Council places on planning obligations and notes the proposed hierarchy of priorities. Whilst we recognise this overall priority, in certain locations the priority could feasibly be different and the policy should reflect this through a flexible approach in terms of provision of affordable housing, highway improvements, open space and education. In Whalley, for example, there is a particular need for additional education provision which might be considered as great a priority as affordable housing in that instance.

As set out in our comments at Section 6, the Council needs to provide sufficient flexibility for reconsideration of these priorities when determining specific development proposals, in order to factor in any provisions that might have previously come forward in addressing an identified need.

With regard to ‘Transport Considerations’, CEG supports the approach set out in accordance with the requirements of PPS1, PPS3 and PPG13.
CORE STRATEGY: GENERATION OF ALTERNATIVE DEVELOPMENT STRATEGY OPTIONS

We write on behalf of [Organisation Name] with regard the current consultation on alternative development options for the Core Strategy.

We are in the process of preparing representations addressing the revised options presented but note that, for the purpose of this consultation, the Council has adopted the current Regional Spatial Strategy (RSS) target of 161 dwellings per annum as the housing requirement for the Ribble Valley over the plan period.

However, the Council has more recently derived a locally based housing target for the Borough through work prepared by NLP to inform preparation of the Core Strategy as part of the evidence base. This work was commissioned partly in response to the high volume of representations received by local residents highlighting concern about the overall housing target.

NLP’s report is due to be presented to Planning Committee next week (11 August) and considers a number of different growth scenarios. It concludes that the housing requirement should be between 190 and 220 dwellings per annum.

The officer’s report highlights that further work is required to agree the figure for the purpose of advancing the Core Strategy. On this basis, it is not currently known whether the Council will seek to promote a higher housing figure to the current statutory requirement of 161 dwellings per annum as set out in the RSS.

Given the amount of housing required is a sensitive issue, the Council should have allowed sufficient time to consider the NLP findings and agreed the approach to the target figure, prior to pursuing consultation on alternative Core Strategy options that deal with apportionment based on a figure which could well change significantly. This concern is reaffirmed by the findings of the NLP work which is not conclusive for the purposes of advancing the Core Strategy.

The apportionment of housing to individual settlements will need to be guided by evidence of housing need/demand (both in quantitative and qualitative...
terms) and aligned with evidence of the availability of sites (and supporting infrastructure) in those settlements, in order to ensure that the overall apportionment of development and options presented are achievable. This is required by guidance contained at paragraph 4.38 of PPS12. To take any other approach is unsound as the options are not being properly tested.

From our discussions with officers, we understand that the Council is satisfied that the current consultation is valid and can proceed without confirmation of the overall housing requirement on the basis that the purpose of the consultation is to focus on alternative options for the spatial distribution of growth. However, the overall level of housing required and subsequent apportionment of housing are inextricably linked and the outcome of this work should have been factored into this consultation.

Considering the findings of the NLP work, notwithstanding the Council's intention to publish the NLP report for consultation, the Council should seek to extend the consultation period on the Alternative Core Strategy Options to reflect the implications of the NLP work and how it relates to the spatial distribution of growth, before advancing a Revised Draft Strategy (Regulation 27 Consultation). This will ensure that there is sufficient opportunity for local residents, stakeholders and those affected by the Council's proposals, to consider the implications and formally respond with any comments.

Please note that this letter does not represent our only submission in response to the consultation. More detailed comments will follow in advance of the 12 August deadline.

Yours faithfully
Alternative Options Consultation
Forward Planning
Ribble Valley Borough Council
Church Walk
Clitheroe
BB7 2RA

12 August 2011

Dear Sir/Madam

PLANNING POLICY CONSULTATION: KEY STATEMENTS AND DEVELOPMENT MANAGEMENT POLICIES – PROPOSED REVISIONS

On behalf of [Company Name], please find enclosed representations prepared in response to the consultation paper 'Key Statements and Development Management Policies – Proposed Revisions' (July 2011).

[Company Name] is a property investment and development company that is promoting land at Lawsonstead's Farm, east of Clitheroe Road in Whalley for a residential led mixed use development. An application for the sites' development is currently being considered by the Council (Application Ref: 3/2011/0111).

It is against this context that we have reviewed the proposed revisions to the Key Statements and Development Management Policies and enclose a Statement detailing our comments.

We trust that these comments will be taken into account but should you require clarification on any of the points made, please do not hesitate to contact us.

Yours faithfully

Enc: Representations

cc:
Key Statements and Development
Management Policies- Proposed
Revisions Consultation July 2011

Representations on behalf of Commercial
Potatoes Group
Key Statements and Development Management Policies - Proposed Revisions Consultation July 2011

Representations on behalf of Commercial Estates Group

August 2011
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<td>2</td>
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<tr>
<td>Environment Chapter</td>
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<td>Housing Chapter</td>
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<td>Economy Chapter</td>
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<tr>
<td>Development Management Key Statements</td>
<td>2</td>
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</tbody>
</table>
Key Statements and Development Management Policies- Proposed Revisions Consultation July 2011

Representations on behalf of Commercial Estates Group

Appendices

Appendix 1
Site Location Plan

Appendix 2
Copy of Regulation 25 Representations (dated 20 October 2010)
1. Introduction

1.1. This Statement has been prepared on behalf of Commercial Expansion Group (CEG) in response to Ribble Valley Borough Council’s (RVBC’s) consultation on its Key Statements and Development Management Policies – Proposed Revisions paper, published July 2011.

1.2. CEG is promoting land east of Clitheroe Road (known locally as ‘Lawsonsteads’) in Whalley for development. An outline application for a mixed use residential led scheme was submitted to RVBC in February 2011 (Ref: 3/2011/0111) and is currently being considered by the Council. A site location plan is contained at Appendix 1.

1.3. It is against this context that the following sections of this Statement have been prepared, reflecting not only CEG’s commercial interests in this site but the effectiveness of the proposed development management policies in securing the stated aims and objectives of the plan.

1.4. This Statement is submitted further to the comments made in response to the Council’s Regulation 25 consultation in 2010. A copy of our previous representations is provided at Appendix 2 for reference.
2. Response to Development Management Policies

Environment Chapter

Sustainable Development and Climate Change (Amended Version)

2.1. We welcome the proposed changes to the Council's Key Statement and paragraph 5.2.4 which now recognises that the ability to meet the Council's renewable energy requirements on site needs to be balanced with ensuring that the wider environment is not adversely affected.

Housing Chapter

Housing Provision (Amended Version)

2.2. As set out in Section 3, the Council is correct in its approach in adopting the current RSS target of 161 dwellings per annum for the Ribble Valley Borough as its housing requirement. However, mindful that the Council has commissioned an independent assessment of what the local housing figure for the Borough as a whole should be, the wording of this Key Statement is likely to change further.

2.3. The proposed plan period also needs to be clarified, reflective of our comments in Section 3 also.

Affordable Housing (Amended Version)

2.4. We would draw to the Council's attention our comments submitted in response to the Regulation 25 Consultation addressing Section 6 (Housing) and setting out that the policy needs to allow sufficient flexibility for consideration of the viability of affordable housing provision alongside other infrastructure requirements i.e. education, in negotiating the overall level of provision on sites.

Economy Chapter

Business and Employment Development (Amended Version)

2.5. We welcome the proposed changes to the policy identifying the amount of employment land that is required during the plan period (i.e. 9 Ha). However, the policy still doesn't go far enough in terms of explaining how future employment requirements might be accommodated (unlike the approach taken to identifying potential 'areas of search' for housing).

Development Management Key Statements

Key Statement DMH1: Affordable Housing Criteria

2.6. We note that the Council's proposed development management policy dealing with
affordable housing provision has been updated to reflect recent revisions to the Council’s Affordable Housing: Memorandum of Understanding, to incorporate an element of elderly person’s accommodation as part of the overall provision.

2.7. Any such policy should be underpinned by a robust assessment of the viability of delivering affordable housing in the Borough in accordance with the guidance contained within PPS3 (paragraph 29). In addition, up to date housing needs surveys which demonstrate the needs of a particular area.

2.8. Whilst the principle of securing a mix of affordable housing provision on sites is acceptable, the Council needs to identify how affordable housing provision sits in terms of the overall hierarchy of contributions and the policy wording should reflect the need to balance the viability of securing such additional units (i.e. a further 7.5% elderly persons accommodation on sites) against other infrastructure requirements and planning obligations being sought.
Forward Planning Draft Core Strategy Consultation
Council Offices
Ribble Valley Borough Council
Church Walk
Clitheroe
BB7 2RA

20 October 2010

By email and post
Core25@ribblevalley.gov.uk
Our ref. SW/192137

Dear Sirs

Ribble Valley Local Development Framework:
Consultation on the Core Strategy 2010

We write on behalf of CEG as a property investment and development company that is promoting the site at Lawsonstead Farm, east of Clitheroe Road in Whalley for residential and ancillary uses (see enclosed Site Location Plan).

This site has been subject to assessment in the Council’s Strategic Housing Land Availability Assessment (SHLAA) and, more recently, formed the basis of discussions with officers and Members. The site’s development will help meet the future needs of Whalley and ensure sustainable growth in the Ribble Valley, with a focus on creating and underpinning vibrant key service centres.

It is against this context that we have reviewed the draft Core Strategy and submit our representations to the Ribble Valley District Council on the enclosed forms.

Key to the overall strategy is the recognition that Ribble Valley Borough Council has to ensure future growth and development is delivered in a sustainable way that meets local needs. The Core Strategy is an important document to help direct investment to meet the identified need for residential and economic growth. The Borough faces a number of challenges in this regard and CEG is keen to assist the Council in the delivery of their Strategy and overall Vision for the Borough.

We trust our comments will be taken fully into account in the preparation of future drafts of the Core Strategy.

Yours faithfully

Enc: Patient
cc:
CORE STRATEGY CONSULTATION:
(Regulation 25)
CONSULTATION COMMENT SUBMISSION FORM

The first stage of Ribble Valley Borough Council’s Core Strategy is currently out for consultation. If you would like to submit any comments to us regarding the Core Strategy, please fill in this form and return it to us. Comments made will be considered prior to the next formal stage of consultation of the Core Strategy. Further consultation will take place before the plan is finalised.

Completed forms can be returned to Core25@ribblevalley.gov.uk or the address given below. Please ensure that we receive comments no later than 5pm WEDNESDAY 20TH OCTOBER 2010.

CONTACT DETAILS: to be used for all future potential correspondence

Name: 
Organisation:* Indigo Planning Services Limited (ro Commercial 
Address: Lower House, 17 Marble Street, 
Postcode: 
Daytime Tel No.
Fax No.
Email Address:
Signature: 
Date: 20 October 2010

* if applicable

Please return all completed forms to the following email address: Core25@ribblevalley.gov.uk

Or by post to:
CORE STRATEGY CONSULTATION
Forward Planning
Development Services
Council Offices
Ribble Valley Borough Council
Church Walk
Clitheroe
BB7 2RA

Please note that as part of the legal requirements of the process we have to make comments received, including the name of respondents, available for public viewing. Addresses and all other personal details will NOT be made public. All comments received will be held on the Council’s LDF database in accordance with the data Protection Act 1998.
Section 2.1: A Spatial Portrait of the Ribble Valley

Paragraph 2.1.5 refers to Clitheroe and Longridge as the ‘Key Service Centres’ within the Borough. However, Appendix 5 (Glossary of Terms) provides a definition for Key Service Centres and states:

"These are seen as the largest settlements in the Borough. For the purposes of this study this relates to Clitheroe, Longridge and Whalley."

Whalley is the third largest settlement in the Borough by population and has an important role in terms of service provision for the rural area and in diversifying the rural economy.

The former Joint Lancashire Structure Plan (Adopted 2005) and former North West Regional Spatial Strategy (RSS) (Adopted 2008) identified Whalley alongside Clitheroe and Longridge as a Key Service Centre and focus for development. This was to help promote regeneration and support its role as a public transport hub for the surrounding villages and rural area.

The Employment and Retail Study undertaken by the BE Group (2008) also assesses employment and retail provision on this basis.

Whalley clearly is a Key Service Centre as identified in Appendix 5, so paragraph 2.1.5 should also include Whalley when referring to the Key Service Centres in the Borough.
Section 2.3: LDF Evidence Base

We note that the Council has undertaken and is continuing to update a range of evidence base research. In particular, the Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market Assessment (SHMA) assess future housing requirements on the basis of the North West Regional Spatial Strategy (RSS) requirement of 161 dwellings per annum. We note that whilst the RSS has since been revoked, there is continued Council support for this target figure which is to be treated as a minimum rather than a ceiling requirement.

With regard to the BE Group’s Employment Land and Retail Study (2008), this forms an important part of the evidence base. We note it identifies that the Borough should seek to identify an additional six hectares of employment land, two hectares of which could be accommodated as an extension to Sidings Business Park. This would help Whalley grow its economic base over the plan period and is supported.

In respect of their findings for the need for additional convenience retail floorspace, we have a number of concerns with the evidence presented as follows.

The report only looks forward to 2018 and not the plan period and bases its analysis on constant market shares. Because of the limited provision of convenience floorspace in the Borough, the majority of convenience spend is lost to stores outside of the Borough. This could be rectified in a sustainable manner through promotion of additional foodstores in the key service centres, leading to a reduction in the need to travel.

This is particularly true in Whalley where there is only one very small store. The study identifies that, of the £60 million available spend in Zone 3 (in which Whalley is the principal town) only £0.03 million is spent in Whalley in 2010. At the same time, £24.3 million is being spent at supermarkets in Clitheroe with approximately £35 million therefore being spent elsewhere outside of the Borough in 2010.

Because the BE Group assume a constant market share, they conclude that there is no need for additional floorspace in Whalley (ie, constant market share increases growth from £0.03m to about £0.037m), yet clearly the evidence identifies that there is a significant convenience spend from residents in the immediate locality (circa £36m) being spent outside of the Borough, a proportion of which could be diverted to support provision of new floorspace in the town in a sustainable way, helping to underpin the service centre.

The Council’s Core Strategy should seek to increase the Borough’s overall retail market share to well over the current 29% identified by the BE Group, which is very low indeed. This should be reflected in positive planning for additional retail floorspace in the key service centres and in accordance with the advice in PPS4.
Section 3.2: The Core Strategy Vision

CEG supports the Council's overall vision for the Ribble Valley and the need to manage delivery of growth and development with environmental and other historic considerations. A key part of the vision is to support vital and vibrant market towns and villages acting as thriving service centres, meeting the needs of residents, businesses and visitors. For this to be achieved and sustained, the service centres need investment and to be targets for growth to meet the identified local needs.

Paragraph 3.2.6 makes reference to the physical, social, environmental and economic regeneration of Clitheroe, Longridge and Whalley being supported, together with existing retail businesses, whilst also ensuring a high quality retail offer in the key service centres and smaller village settlements. CEG supports the Council's recognition of these factors in planning for sustainable growth and development.
Section 3.3: Strategic Objectives

Paragraphs 3.3.3 and 3.3.4 identify the need to provide sufficient housing to meet local needs, including provision of adequate affordable housing. In order to achieve these strategic objectives, the Council and community must recognise the requirement to identify sufficient land around the Key Service Centres to ensure future development is sustainable and able to address identified local needs. CEG's interests at Lawsonstead Farm will help achieve these objectives for Whalley and the wider Borough.

Paragraph 3.3.5 recognises that the Council needs to promote employment opportunities to help sustain economic growth and provide jobs near where people live with a balance of land uses. As a consequence, the Council should be seeking to retain existing employment sites, where possible and commercially viable, and promote new provision either on or adjacent to existing sites.

In the case of Whalley, there is the opportunity for provision of additional employment land near to the train station and adjacent to the existing employment provision at The Sidings. The Council should seek to protect and identify this opportunity to help meet local employment needs.

Paragraph 3.3.7 recognises the need to support existing retail businesses whilst improving the current retail offer to ensure the continued vitality and viability of existing retail areas. Although Whalley is a Key Service Centre, it does not have a defined retail core and has a limited convenience retail offer, requiring residents to travel to nearby Clitheroe or Longridge for convenience shopping. In planning for sustainable growth, the Council should encourage and identify some retail development alongside new housing in Whalley to meet local needs. This would accord with the principles of sustainable development as set out in PPS1 and PPS3 and help generate employment in accordance with PPS4.

Paragraph 3.3.9 promotes improved accessibility and service delivery to address rural isolation, including in respect of access to services, support for local employment and affordable housing. In seeking to promote sustainable development and realise this objective, the Council should seek to focus new development into the identified Key Service Centres which have best access to services and facilities including public transport provision, which should be the focus for future investment and improvements.

Some small scale local development is likely to be required in the smaller more rural settlements to meet specific local housing needs, but to deliver the vision, the majority of growth should be focused on the Key Service Centres. A dispersed approach would undermine the principles of sustainable development and the objective of ensuring vibrant Key Service Centres.
Section 4 Development Strategy

Paragraph 4.1.3 sets out three development strategy options as follows:

"Option 1: Development will be directed towards the service centres comprising Clitheroe, Longridge and Whalley, including the opportunity to expand their existing settlement limits to accommodate residential and employment growth. Limited development will be accommodated through appropriate village growth and/or expansion where appropriate.

Option 2: Longridge will be viewed as a strategic growth area for the Ribble Valley and a focus of development striving to achieve a competitive and sustainable economy, providing opportunities not only for economic development but also for social and environmental improvement.

Option 3: Development in the Borough will be accommodated through the strategic release of sites that can accommodate high levels of development. A number of strategic sites will be released to create opportunities for new local communities and areas of growth whilst supporting the protection of the wider environment for future generations."

All three options are predicated on a requirement for provision of circa 1,500 dwellings. This figure is derived from an assessment of the Council's housing land supply position as at 31 March 2010, against the former RSS requirement of 2,900 dwellings between the period 2003 and 2021. It takes into consideration completions since 1 April 2003 and commitments (i.e. sites with planning permission either under construction or not started). This represents the residual requirement between 1 April 2010 and 31 March 2021.

[NB: Based on the Council's 2010 Housing Land Monitor the actual figure is 1,436 and it is this figure that we have used in our subsequent calculations].

On the basis that the Core Strategy is intended to be a plan covering a 15 year period (in accordance with the requirements of PPS8, paragraph 53) and the Council, at Section 6, identifies a housing target of at least 161 dwellings per annum, the reported requirement of 1,500 is incorrect. The actual amount of housing land required for the plan period of 2010 to 2025 based on the RSS methodology is at least 2,080, calculated as follows:

- RSS Residual Requirement 2010-2021: 1,436
- Additional Annual Requirement 2021-2025: +644 (161 x 4)
- Total Requirement: 2,080

This should be treated as a minimum requirement (Scenario 1 referred to below).
Section 4 Development Strategy Cont...

This figure still remains uncertain as it relies on delivery of 502 dwellings subject to extant permissions, particularly as the net completion rate during the past seven years (2003-2010) has only been 137 per annum (based on 982 completions) against the annual target of 161. This demonstrates that slippage and other market factors are likely to continue to influence delivery.

A more robust approach is based on the Council’s own evidence and support for provision of 161 dwellings per annum during the lifetime of the plan. Put simply, this would require provision of 2,415 dwellings (15 x 161) between 2010 and 2025 (Scenario 2). This is CEG’s preferred approach as it reflects the need to plan, monitor and manage housing provision during the full 15 year plan period, reflecting on continued commitment to a minimum target of 161 dwellings per annum.

The approach to the figure of 161 dwellings per annum has been long supported by the Council prior to adoption of the RSS and more recently endorsed by Members at a council meeting on 17 June 2010, since the new Government came to office. The Council’s evidence base research is ongoing, however, there is potentially a requirement for more than 161 dwellings per annum based on identified housing needs. This should be considered as part of the Core Strategy.

In any event, we note that in both instances this only represents a plan for future housing provision for the next 15 years but it should be recognised that further housing development in the future will be required beyond then as the population continues to grow.

It is against this context that the following comments are made regarding the apportionment of growth to each of the Key Service Centres and the indicative options set out by the Council.

Overall, CEG supports 25-30% apportionment of new housing development into Whalley (i.e. 604-724 dwellings based on the adjusted minimum overall requirement to 2025).

This represents an alternative approach to development to that currently set out in the Council’s Options 1, 2 and 3 and will enable the identified level of growth to be delivered in a more sustainable way.

In order to inform this alternative approach, we have undertaken a desk-based appraisal of the spatial options for growth in each of the main settlements (defined as Clitheroe, Longridge, Whalley, Wilpshire and Billington in the current Local Plan, Policy G2). We make the following observations:

- **Clitheroe** – this is the largest and most central of the main settlements and is a market town in its own right. The area straddles the mainline railway with strategic growth and expansion opportunities primarily to the south and west (given linkages to the town centre) and possibly to the east, all of which are in the open countryside. The town centre provides a range of services and facilities and public transport provision, including a rail link to both Manchester and Preston.

- **Longridge** – this is the second largest settlement (based on population) and is bordered to all sides by open countryside, with land to the west beyond the settlement boundary forming part of the Preston local authority area. Expansion of the area could be accommodated to the north and east and would serve both the Ribble Valley and the outskirts of Preston but the service centre does not benefit from a rail link.

Cont...
Section 4 Development Strategy Cont...

- Whalley – this is the third largest settlement (based on population) and is also served by the mainline railway between Manchester and Clitheroe (which provides the settlement boundary to the west). Opportunities for growth are primarily to the north and east in the open countryside (including the Lawsonstead Farm site). It has a range of services and facilities and good public transport provision.

- Wilpshire – land to the north, east and west of the settlement boundary is in the Green Belt. Land to the south is situated in an adjacent local authority area (Blackburn). The settlement boundary is tightly drawn and whilst Wilpshire does have a train station, there is limited opportunity for the settlement to expand without encroaching into the Green Belt or through growth in Blackburn which would not meet Ribble Valley’s identified need.

- Billington – the settlement is bordered to the east by the main railway line (Blackburn to Whalley) beyond which is Green Belt. Whalley New Road bounds the settlement to the west. Again, the settlement boundary is tightly drawn and has few facilities.

Taking these factors into account and reflecting on the Council’s own evidence base which identifies the availability of future housing sites in the key settlement areas, we put forward the following alternative approach to development further to Option 1 presented in the Council’s document. This reflects on a minimum requirement for circa 2,415 dwellings to be delivered between 2010 and 2025 (as set out above).

<table>
<thead>
<tr>
<th>Settlement Area</th>
<th>Amount of Housing Growth (2010-2025)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Scenario 1</td>
</tr>
<tr>
<td></td>
<td>Minimum 2,080 Dwellings</td>
</tr>
<tr>
<td>Clitheroe</td>
<td>35% - 40%</td>
</tr>
<tr>
<td></td>
<td>(728 – 832 Dwellings)</td>
</tr>
<tr>
<td>Longridge</td>
<td>20% - 25%</td>
</tr>
<tr>
<td></td>
<td>(416 - 520 Dwellings)</td>
</tr>
<tr>
<td>Whalley</td>
<td>25% - 30%</td>
</tr>
<tr>
<td></td>
<td>(520 – 624 Dwellings)</td>
</tr>
<tr>
<td>Other Settlements and Rural Areas</td>
<td>15%</td>
</tr>
<tr>
<td></td>
<td>(312 Dwellings)</td>
</tr>
</tbody>
</table>

This represents a balanced approach but with a greater focus on Clitheroe and Whalley, as these settlements have the better opportunities for expansion and the creation of sustainable communities, in physical terms, tying in with the existing urban grain and also with the best public transport links including main line rail and other available services.

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Response Ref:
Acknowledgment card sent?
Section 4 Development Strategy Cont...

In meeting the development needs of Whalley, CEG supports the identification of land at Lawsonsteds Farm (Ref: 1F in existing Option 1 and 2H in Option 2) as an 'Area of Search'. As the Council has already identified, this site scored highly in the Strategic Housing Land Availability Assessment (SHLAA) and is a suitable location for a residential extension to the settlement.

The benefits of this sustainable extension will be fully communicated through ongoing liaison with Council officers and the local community. The site is able to contribute to meeting local housing needs both in quantitative and qualitative terms over the short to medium term, providing high quality development whilst respecting the character of the area and environment.

Whalley is a Key Service Centre and has an important role in terms of service provision for the surrounding rural areas. Its growth has the potential to sustain and underpin the economy of the rural hinterland and improve access to housing, services, education, healthcare and employment. It has good transport links to surrounding towns and villages with scope for further enhancement supported by new development.

On this basis, it represents a suitable and sustainable location as a focus for future growth and development. This should be reflected through the apportionment of housing we advocate in the Council’s strategy and in order to support future infrastructure provision.

Based on the aims and objectives set out at paragraph 4.1.3 with regard to each of the options, CEG makes the following comments:

- Whilst the principle of focusing development into the Key Service Centres of Clitheroe, Longridge and Whalley is supported, CEG objects to the quantum of development proposed in Option 1 and overall apportionment of growth. An alternative approach (Scenario 2) is proposed based on a minimum of 2,415 dwellings between 2010 and 2025 (as set out above).

- CEG objects to Options 2 and 3 on the following grounds:
  - Both Clitheroe and Whalley form part of the central core of the Borough and their expansion will have a greater positive impact on the surrounding rural villages which they serve.
  - Whilst Longridge is the second largest settlement in terms of population size, it sits on the periphery of the Borough and has no rail link. On this basis, the overall apportionment to Longridge should be carefully managed. Option 2 places too much reliance on Longridge in this regard.
  - Whilst there is likely to be a limited requirement for some new housing development in the smaller villages during the plan period, focusing the majority of new development away from the Key Service Centres does not represent good planning as it is not making best use of and build on existing services, facilities and opportunities to promote sustainable patterns of development. This approach detracts from the Council’s overarching vision for the Borough and will affect the ability of the Council to satisfy its strategic objectives. Option 3 is unsustainable.

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Response Ref: 
Acknowledgment card sent?
Section 5: Environment

CEG supports the Council's continued protection of existing areas of Green Belt and Areas of Outstanding Natural Beauty (AONB). In particular, the Borough has large expanses of open countryside around the Key Service Centres of Clitheroe, Whalley and Longridge and, in seeking to promote sustainable growth, the focus of development should be into these areas, negating the need for Green Belt release in the plan period. The Council's proposed development management approach to new development in the open countryside is consistent with PPG2 (Green Belts).

With regard to the Forest of Bowland AONB, CEG also supports its continued protection, conservation and enhancement and the development management approach set out with regard to proposals both with and adjacent to this area. However, the Council should make it clear that its protection and conservation does not preclude new development, and recognise that it can often facilitate the implementation of schemes which secure the longevity and inherent value of an area.

In terms of the approach to Sustainable Development, CEG supports the overall principles which comply with the guidance set out in PPS1. However, with regard to promoting on site renewable energy, as set out at paragraph 5.2.4, the policy wording itself should recognise that the ability to meet this requirement on site will need to be balanced with ensuring that the wider environment is not adversely affected.
Section 6: Housing

In terms of the Council’s statement on ‘Housing Provision’, we offer the following comments:

CEG supports the Council’s continued promotion of provision of at least 161 dwellings per annum. This is consistent with the approach set out in the former NW RSS which was supported by the Council and underpinned by a robust evidence base. This has been endorsed by Members of the Planning Committee on 17 June 2010. The approach is also reflective of the Council’s own evidence base regarding future housing requirements and in line with national forecasts regarding population projections and demographic changes.

However, the Council should clarify that the time period which this minimum target relates is 2010 to 2025, in accordance with the overall time period for the Core Strategy. Based on the preferred option set out, this results in a total requirement of a minimum of 2,415 dwellings (Scenario 2) between 2010 and 2025.

As the Council correctly sets out, it will seek to identify suitable sites for residential development that are deliverable over a five year period, in accordance with the requirements of PPS3, and ensure that sufficient housing land is identified for the full 15 year period and beyond.

With regard to the statement on ‘Housing Balance’, CEG supports the approach set out and recognises that new residential development needs to adequately address identified local requirements.

The Council’s statement on ‘Affordable Housing’ sets out a requirement for provision of 30% affordable housing on a range of sites across the Borough. Whilst the overall principle of this level of provision is supported, the Council’s approach to determining a reduction in the levy is unduly restrictive and does not enable consideration of the implication of other potential planning obligations, i.e. education, in negotiating the overall level of provision. The delivery of sustainable growth in the Key Service Centres will necessitate investment in local services and infrastructure that could affect the ability to deliver as much as 30% affordable housing. This will be a material consideration in the determination of applications and the policy should ensure the flexibility to enable delivery.

In any event, any policy should be underpinned by a robust assessment of the viability of delivering affordable housing in the Borough in accordance with PPS3, paragraph 29. In addition, up to date housing needs surveys which demonstrate the needs of a particular area.

In accordance with the Council’s later statement on planning obligations, the Council identifies that affordable housing provision is a top priority. However, each of the Key Service Centres will have their own infrastructure demands including affordable housing, highways infrastructure, parking, access to health and education. The strategy needs to allow sufficient flexibility for consideration of these factors together to ensure that development can assist meeting local needs in the most effective and sustainable way.
Section 7: Economy

In terms of the Council's statement on 'Business and Employment Development', we make the following comments:

CEG supports the overall approach to promoting land for employment use but the Council should make clear how much land is required. The evidence base suggests that this is in the order of 6 Ha, however, this is not set out in the strategy and unlike the approach taken to identifying potential 'areas of search' for housing, the strategy should explain further how future employment requirements might be accommodated.

Paragraph 7.1.4 identifies that the Key Service Centres of Clitheroe, Longridge and Whalley are the Council's preferred locations for new employment development. CEG supports the approach to directing employment development into the principle settlement areas in seeking to align jobs with homes in key areas.

Following the approach to apportionment as set out with regard to housing, future employment land provision might be accommodated as follows:

<table>
<thead>
<tr>
<th>Settlement Area</th>
<th>Core Strategy Requirement (6 Ha)</th>
<th>2010-2025</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clitheroe</td>
<td>35% - 40%</td>
<td>(2.1 – 2.4 Ha)</td>
</tr>
<tr>
<td>Longridge</td>
<td>20% - 25%</td>
<td>(1.2 – 1.5 Ha)</td>
</tr>
<tr>
<td>Whalley</td>
<td>25% - 30%</td>
<td>(1.5 – 1.8 Ha)</td>
</tr>
<tr>
<td>Other Settlements and Rural Areas</td>
<td>15%</td>
<td>(0.9 Ha)</td>
</tr>
</tbody>
</table>

With regard to how future employment development might be accommodated in Whalley, we note that land adjacent to the existing Sidings employment area is identified in the BE Group Employment and Retail Study (2008) as a suitable location for future employment development in Whalley in the medium term.

Overall, in this context, CEG supports draft policy 'DMB1: Supporting Business Growth and the Local Economy' which takes this approach.

In addition and in accordance with PPS4, in planning for future employment development, the Council should provide flexibility for a range of employment generating uses to come forward, aside from the traditional B1, B2 and B8 uses.

CEG supports the Council's statement regarding 'Development of retail, shops and facilities' which seeks to promote development that supports the retail function of the Key Service Centres of Clitheroe, Longridge and Whalley.

Cont...
Section 7: Economy Cont...

In particular, draft policy 'DMR2: Shopping in Longridge and Whalley' provided at Appendix 4 recognises the contribution that further retail provision in these areas could make to meeting the service needs of the settlement. As set out previously, Whalley, does not have a defined retail core and has a limited convenience retail offer, requiring residents to travel to nearby Clitheroe or Longridge for convenience shopping.

In planning for the sustainable growth of Whalley, and as set out above in respect of our comments on the BE Group report, the Council should identify further retail development, alongside new housing and employment. Not only does this approach accord with the principles of sustainable development as set out in PPS1 and PPS3, but is also in accordance with PPS4, which recognises that retail is an employment generating use itself and therefore could help support the continued economic growth of Whalley.
Section 8: Delivery Mechanisms and Infrastructure

CEG recognises the importance the Council places on planning obligations and notes the proposed hierarchy of priorities. Whilst we recognise this overall priority, in certain locations the priority could feasibly be different and the policy should reflect this through a flexible approach in terms of provision of affordable housing, highway improvements, open space and education. In Whalley, for example, there is a particular need for additional education provision which might be considered as great a priority as affordable housing in that instance.

As set out in our comments at Section 6, the Council needs to provide sufficient flexibility for reconsideration of the priorities when determining specific development proposals, in order to factor in any provisions that might have previously come forward in addressing an identified need.

With regard to 'Transport Considerations', CEG supports the approach set out in accordance with the requirements of PPS1, PPS3 and PPG13.
Alternative Options Consultation
Forward Planning
Ribble Valley Borough Council
Church Walk
Clitheroe
BB7 2RA

12 August 2011
By email and post
response@ribblevalley.gov.uk
let.022.01920137

Dear Sir/Madam

PLANNING POLICY CONSULTATION: GENERATION OF ALTERNATIVE DEVELOPMENT STRATEGY OPTIONS FOR THE CORE STRATEGY

On behalf of [redacted] (company), please find enclosed representations prepared in response to the consultation paper 'Generation of Alternative Development Strategy Options for the Core Strategy' (July 2011).

[company] is a property investment and development company that is promoting land at Lawsonstead's Farm, east of Clitheroe Road in Whalley for a residential led mixed use development. An application for the site's development is currently being considered by the Council (Application Ref: 3/2011/0111).

It is against this context that we have reviewed the alternative development strategy options document and enclose a Statement detailing our comments.

Please note, we reserve the right to comment on these options further once we have had an opportunity to consider the findings of the work recently undertaken by Nathaniel Lichfield and Partners as set out in their 'Headroom Report'. This report was presented to the Council's Planning and Development Control Committee last night (11 August), however, is yet to be formally published for consultation by the Council.

We trust that these and any future comments will be taken into account in preparation of the Council's Core Strategy Regulation 27 Consultation Draft but should you require clarification on any of the points made, please do not hesitate to contact us.

Yours faithfully,

[Signature]

Enc: Representations
cc: [redacted]
Core Strategy: Generation of Alternative Development Strategy Options Consultation July 2011

Representations on behalf of Commercial Estates Group
Core Strategy: Generation of Alternative Development Strategy Options Consultation July 2011

Representations on behalf of Commercial Estate Group
August 2011

Indigo Planning Limited
58-70 Blackfriars Road
London, SE1 8XP
Enquiries: 020 7453 6911
info@indigo-planning.com
Core Strategy: Generation of Alternative Development Strategy Options Consultation July 2011

Representations on behalf of Commercial Estates Group

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Appendices

Appendix 1
Site Location Plan

Appendix 2
Copy of Regulation 25 Representations (dated 20 October 2010)

Appendix 3
Copy of letter to Ribble Valley Borough Council dated 5 August 2011
1. **Introduction**

1.1. This Statement has been prepared on behalf of Commercial Estate Group (CEG), a response to Ribble Valley Borough Council's (RVBC’s) consultation on its Core Strategy: Generation of Alternative Development Strategy Options paper, published July 2011.

1.2. CEG is promoting land east of Clitheroe Road (known locally as 'Lawsonsteads') in Whalley for development. An outline application for a mixed use residential led scheme was submitted to RVBC in February 2011 (Ref: 3/2011/0111) and is currently being considered by the Council. A site location plan is contained at **Appendix 1**.

1.3. It is against this context that the following sections of this Statement have been prepared, reflecting not only CEG’s commercial interests in this site but the suitability of the Key Service Centre of Whalley in accommodating future development. However, overall, based on the evidence currently available, the Council and key stakeholders need to accept that there is a need for growth across the Borough and the Core Strategy, in line with current policy guidance and the draft National Planning Policy Framework (NPPF), needs to plan positively for this in line with the Council’s wider social, economic and environmental objectives.

1.4. The purpose of the Council’s latest consultation is to outline five additional options (A to E) for accommodating growth across the Borough, further to consideration of comments received in respect of three earlier options (1 to 3) presented in the Council’s (Regulation 25) Consultation Report published in August 2010.

1.5. The following sections set out our response to the alternative options, with reference to the guidance contained within PPS12 and with particular regard to:

- the proposed plan period;
- the level of housing growth required during this period;
- how future housing might be apportioned between settlements;
- how this apportionment relates to the current settlement hierarchy and access to services, facilities and public transport; and,
- the appropriateness of promoting urban extensions.

1.6. This Statement is submitted further to the comments made in response to the Council’s Regulation 25 consultation in 2010. A copy of our previous representations is provided at **Appendix 2** for reference.
2. Relevant Planning Policy

2.1. This Statement has regard to planning policy at both national and regional levels. The key points from some key documents are summarised below and it is against this policy context that Sections 3 and 4 of this Statement have been prepared.

**PPS1: Delivering Sustainable Development (January 2005)**

2.2. PPS1 states that in preparing spatial plans, Local Planning Authorities (LPA’s) should:

(i) *Set a clear vision for the future pattern of development: with clear objectives for achieving that vision and strategies for delivery and implementation;*

(ii) *Consider the needs and problems of the communities in their areas and how they interact, and relate them to the use and development of land; and*

(iii) *Seek to integrate the wide range of activities relating to development and regeneration. Plans should take full account of other relevant strategies and programmes and, where possible, be drawn up in collaboration with those responsible for them*.

**PPS3: Housing (June 2011)**

2.3. PPS3 states:

"At the local level, Local Development Documents should set out a strategy for the planned location of new housing which contributes to the achievement of sustainable development*.

2.4. It highlights criteria to be used for identifying broad locations and specific sites which includes:

"Evidence of current and future levels of need and demand for housing as well as the availability of suitable, viable sites for housing developments*.

2.5. PPS3 indicates "the level of housing provision should be determined taking a strategic, evidence based approach that takes into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders*. In determining the local, sub-regional and regional level of housing provision, PPS12 advises LPA’s to take into account evidence of current and future levels of need and demand for housing and affordability levels based upon *inter alia*:

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1 PPS1 (2005), Paragraph 32
2 PPS3 (2011), Paragraph 38
3 PPS3 (2011), Paragraph 38
4 PPS3 (2011), Paragraph 32
"The Government’s latest published household projections and the needs of the regional economy, having regard to economic growth forecasts." 

2.6. At the local level, LPA’s should set out in LDO’s their policies and strategies for delivering the level of housing provision, identifying broad locations and specific sites that will enable continued delivery of housing for at least 15 years from the date of adoption, taking into account the level of housing provision set out in the RSS.

**PPS12: Local Spatial Planning (2008)**

2.7. PPS12 confirms that the Regional Spatial Strategy (RSS) is part of the development plan for the area by virtue of Section 38(3) of the Planning and Compulsory Purchase Act 2004. It states:

> *RSS provides the overall spatial vision for the entire region, identifying the broad locations for growth, often by identification of sub regions, and major infrastructure requirements, together with the housing numbers to be provided for in local development documents. The RSS is a product of effective engagement with local authorities and others. Therefore it provides the regional framework against which local participation in creating sustainable community strategies and Core Strategies takes place.*

2.8. PPS12 requires LPA’s in devising their strategies to be consistent with national policy and in general conformity with the RSS. PPS12 also allows Core Strategies to allocate strategic sites for development which are considered central to the achievement of the strategy.

2.9. PPS12 requires LPA’s to produce a Core Strategy which includes a delivery strategy for achieving its strategic objectives. The delivery strategy should set out how much development is intended to happen where, when and by what means it will be delivered.

2.10. In terms of Infrastructure, PPS12 requires the Core Strategy to be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided.

2.11. In terms of plan period, PPS12 advises that the time horizon of the Core Strategy should be at least 15 years from the date of adoption.

2.12. The ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. PPS12 requires LPA’s to seek out and evaluate reasonable alternatives but clearly states that “there is no point in inventing

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6 PPS3 (2001), Paragraph 33
6 PPS3 (2011), Paragraph 53
7 PPS12 (2008), Paragraph 3.1
6 PPS12 (2008), Paragraph 4.1
7 PPS12 (2008), Paragraph 4.8
10 PPS12 (2008), Paragraph 4.13
alternatives if they are not realistic\textsuperscript{11}.

**Draft National Planning Policy Framework (July 2011)**

2.13. The overall aim of the draft National Planning Policy Framework (NPPF) is to set out the economic, environmental and social planning policies for England, which, taken as a whole, will underpin the promotion of sustainable development. Once formalised, the draft will provide the framework for the preparation of local and neighbourhood plans, as set out in the Localism Bill currently making its way through the Parliamentary process.

2.14. The draft NPPF sets out the Government’s growth agenda and outlines three key aims for the planning system, including planning for prosperity (an economic role) and for people (a social role):

"by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure\textsuperscript{12}.

"by providing an increased supply of housing to meet the needs of present and future generations… with accessible local services that reflect the community’s needs and supports its health and well being.\textsuperscript{13}

2.15. It identifies a presumption in favour of sustainable development and that a positive planning system is essential to ensure a sustainable future can be achieved. It states:

"significant weight should be placed on the need to support economic growth through the planning system\textsuperscript{14}.

2.16. It continues:

"All plans should be based upon and contain the presumption in favour of sustainable development as their starting point.\textsuperscript{15}

2.17. The draft NPPF summarises a number of core land-use planning principles that underpin both plan making and development management, in particular, it states:

"Planning policies and decisions should actively manage patterns of growth to make the fullest use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable\textsuperscript{16}.

2.18. In terms of the preparation of development plans, paragraph 20 states:

\textsuperscript{11} PPS12 (2008), Paragraph 4.38
\textsuperscript{12} Draft NPPF (July 2011), Paragraph 10
\textsuperscript{13} Draft NPPF (July 2011), Paragraph 10
\textsuperscript{14} Draft NPPF (July 2011), Paragraph 13
\textsuperscript{15} Draft NPPF (July 2011), Paragraph 15
\textsuperscript{16} Draft NPPF (July 2011), Paragraph 19
"Development plans must aim to achieve the objective of sustainable development. To this end, they should be consistent with the objectives, principles and policies set out in this Framework, including the presumption in favour of sustainable development. This means that plans should be prepared on the basis that objectively assessed development needs should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".

2.19. The advice produced by the Planning Inspectorate for use by its Inspector's sets out that, whilst the draft NPPF is a consultation document and, therefore, subject to potential amendment, it gives a clear indication of the Government's 'direction of travel' in planning policy. Therefore the draft NPPF is capable of being a material consideration in determining appeals and development plan casework.
3. **Response to Core Strategy Alternative Options**

**General Comments**

3.1. Sections 1 and 2 of the Council's consultation paper provide a summary of the outcome of the representations received in response to the Regulation 25 consultation undertaken in 2010.

3.2. Paragraph 1.2 highlights that most respondents stated a preference for an alternative 'Option 4' approach to the distribution of housing, rather than that advocated in Options 1, 2 and 3 presented in the document. The Council states that most respondents provided no detail of what an alternative option might comprise but did identify how this might be shaped, and confirms the 'common themes and ideas' put forward.

3.3. This information is helpful in understanding how the Council has taken into account previous consultation responses in preparing a series of further alternative options. However, we are mindful that the outcome of the earlier consultation exercise is not fully reflective of all residents of the Borough, noting that a particularly high response rate was received from Whalley residents as a result of a number of pre-application discussions that were taking place at the time of the consultation. This is a factor identified by officers in a report to the Planning and Development Control Committee (dated 17 March 2011) setting out the findings of the consultation.

3.4. We also note that, contrary to the Council's statement at paragraph 2.2 (last bullet), on behalf of CEG, Indigo did put forward proposals for an alternative growth strategy i.e. Option 4, which was set out in numerical terms so it was clear how much growth might be apportioned to each of the key settlement areas. This does not appear to have been reflected in the Council's statement.

3.5. As is recognised at paragraph 4.1 of the consultation document, no clear alternative option emerged from the previous consultation but we note that Option 1 (promoting 45% growth to Clitheroe, 30% to Whalley and 5% to Longridge) was the second favourite.

**Proposed Plan Period**

3.6. For the purpose of this consultation, the Council has defined the proposed plan period as 2008 to 2028, with anticipated adoption of the Core Strategy in 2012.

3.7. Whilst this approach broadly aligns with the guidance contained within PPS12 in so far as the need for the Core Strategy to have a defined plan period of a minimum 15 years from the date of adoption, it is not clear as to why the Council has rolled back the start date of the plan
to 2008 when the anticipated adoption date is 2012 and how this then relates to the end of the plan period i.e. 2028.

3.8. If the purpose of this approach is to ensure that the plan spans a 20 year timeframe, it would be more appropriate to set the plan period from now i.e. 2011 to 2031, given the Council is looking to progress to the Regulation 27 Consultation stage later this year, with a view to adoption of the Core Strategy next year. This would bring the plan period up to date and ensure it is forward looking for the minimum appropriate amount of time, as is required by PPS12.

**Level of Housing Provision**

**General Approach**

3.9. PPS3 and PPS12 require Core Strategies to be in general conformity with the RSS. On this basis and in the absence of a locally derived housing target, the Council is correct in its approach in adopting the current RSS target of 161 dwellings per annum for the Ribble Valley Borough as its housing requirement.

3.10. However, paragraph 3.2 of the consultation document states that due to a high volume of representations highlighting concern about the overall housing target for the Borough, the Council has commissioned independent consultants (Nathaniel Lichfield and Partners) (NLP) to derive a locally based housing target to inform preparation of the Core Strategy and as part of its evidence base, suggesting that the current statutory requirement of 161 dwellings per annum might change.

3.11. NLP’s draft report was recently presented to Planning and Development Committee (11 August) in order to secure approval from the Council’s Members for its publication for the purpose of consultation. It considers a number of different growth scenarios and concludes that the housing requirement for the Borough should be between 190 and 220 dwellings per annum. The accompanying officer’s report highlights that further work is required to agree the figure for the purpose of advancing the Core Strategy. On this basis, it is not currently known whether the Council will seek to promote a higher housing figure to the current statutory requirement of 161 dwellings per annum as set out in the RSS.

3.12. Given the amount of housing required is a sensitive issue, the Council should have allowed sufficient time to consider the NLP findings and agreed the approach to the target figure, prior to pursuing consultation on alternative Core Strategy options that deal with apportionment based on a figure which could well change significantly. This concern is reaffirmed by the findings of the NLP work which is not conclusive for the purposes of advancing the Core Strategy.

3.13. The apportionment of housing to individual settlements will need to be guided by evidence of
housing need/demand (both in quantitative and qualitative terms) and married with evidence of the availability of sites (and supporting infrastructure) in those settlements, in order to ensure that the overall apportionment of development and options presented are achievable. This is required by guidance contained at paragraph 4.38 of PPS12. To take any other approach is unsound as the options are not being properly tested.

3.14. From discussions with officers, we understand that the Council is satisfied that the current consultation is valid and can proceed without confirmation of the overall housing requirement for the Borough (if this is to be different to the statutory RSS requirement), on the basis that the purpose of the consultation is to focus on alternative options for the spatial distribution of growth. However, the overall level of housing required and subsequent apportionment of housing are inextricably linked and the outcome of this work should have been factored into this consultation.

3.15. Based on the findings of the NLP work, notwithstanding the Council’s intention to publish the NLP report for consultation, the Council should seek to extend the consultation period on the Alternative Core Strategy Options to reflect the implications of the NLP work and how it relates to the spatial distribution of growth, before advancing a Revised Draft Strategy (Regulation 27 Consultation). This will ensure that there is sufficient opportunity for local residents, stakeholders and those affected by the Council’s proposals, to consider the implications and formally respond with any comments.

3.16. We have submitted a letter to the Council on this point specifically, in advance of the consultation period closing (dated 5 August 2011). A copy is enclosed at Appendix 3.

Proposed Housing Figure

3.17. The alternative options presented (A to E) are predicated on a total housing requirement of 2,987 dwellings across the Borough between 2008 and 2028. This assumes a requirement of 161 dwellings per annum over 20 years (a total of 3,220 dwellings) but factoring in a reported 233 completions, giving a residual requirement of 2,987 dwellings between 2010 and 2028.

3.18. It would be helpful if the Council could provide a schedule of these completions (i.e. the 233 figure) and detail the time period to which they relate.

3.19. Given the current uncertainty about the plan period to which the Core Strategy will relate, in particular the start date, for the purpose of this Statement we have taken the requirement figure as 3,220 dwellings split over a 20 year period in line with the current RSS. Notwithstanding any changes resulting from the assessment of a locally derived housing target, we acknowledge that this figure might change slightly, based on the number of completions that have taken place since the start of the plan period. However, this is unlikely to result in a significant deviation for the purpose of considering the Council’s growth strategy.
and future housing needs on the whole.

3.20. In any event, as RSS paragraph 7.19 states, the annual average figure is not an absolute target and may be exceeded where justified by evidence of need, demand, affordability and sustainability issues and fit with local and sub-regional strategies. For this reason, and owing to such considerations as the Government’s agenda for growth, the relationship between housing and the economy, this annual and total provision should be regarded as a minimum requirement for the Borough.

3.21. Furthermore, the Draft NPPF sets out at paragraph 109 that in order to boost the supply of housing, LPA’s should, _inter alia:_

“identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The supply should include an additional allowance of at least 20 per cent to ensure choice and competition in the market for land”.

3.22. The accompanying Impact Assessment states:

“Government is placing a clear expectation on local councils to be ambitious in delivering housing land through ensuring more choice and competition in the land market, by requiring an additional 20 per cent of deliverable sites to be identified to meet their five year housing requirement. This policy requiring councils to identify additional ‘deliverable’ sites should help to provide an overall land supply that is actually viable and ready to be delivered and developed”.

3.23. Our previous representations highlighted that the current RSS target has been long supported by the Council, prior to adoption of the RSS and more recently endorsed by Members at a Council meeting in June 2010.

3.24. This fact when read alongside the guidance contained in PPS12 and the Draft NPPF, reaffirms that the current RSS figure of 161 dwellings per annum should be treated as a minimum for the purpose of planning future growth in the Core Strategy and ensuring housing delivery.

**Alternative Levels of Housing**

3.25. This Statement has already highlighted our concerns regarding the Council’s approach to consulting on alternative options for the Core Strategy, in advance of understanding the outcomes of the NLP work, the Council’s agreed approach to the target figure and how this then informs the spatial distribution of development.

3.26. However, based on the initial findings of NLP’s draft report (as presented to the Council’s Members on 11 August), the Council should be planning for a higher level of growth than that currently required by RSS (i.e. in the order of between 190 and 220 dwellings), to meet
projected demographic changes, notwithstanding whether there is a need to factor in and pursue economic growth objectives which could increase the requirement further.

3.27. The final figure will be largely dependent upon the Council’s wider growth aspirations, the ability to deliver this amount of growth and need to balance new development against protection of its rich and diverse environment.

3.28. Notwithstanding the current statutory RSS requirement, based on the initial findings of the NLP work, it is our view that the Council’s Core Strategy should plan for an absolute minimum of 205 dwellings per annum (taken as the mid point between NLP’s recommended range).

3.29. On this basis, the housing requirement for the plan period across the Borough should be in the order of 4,100 dwellings (over a 20 year period 2010 to 2030). It is against this context that the following comments are made regarding the spatial apportionment of growth throughout the Borough.

3.30. We reserve the right to comment further on the overall level of housing and how this relates to the alternative options presented, once the final draft NLP report is published for consultation.

Comments on Alternative Spatial Options

3.31. The following table summarises the Council’s alternative spatial options as presented in the consultation paper (including reference to the three earlier options presented):

**Table 1: Council’s Alternative Spatial Options**

<table>
<thead>
<tr>
<th>Settlement / Option</th>
<th>Clitheroe</th>
<th>Longridge</th>
<th>Whalley</th>
<th>Other Settlements</th>
<th>Strategic Site: Clitheroe</th>
<th>Strategic Site: Barrow</th>
</tr>
</thead>
<tbody>
<tr>
<td>Option A</td>
<td>52%</td>
<td>27%</td>
<td>11%</td>
<td>10%</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>(1553 dwg)</td>
<td>(803 dwg)</td>
<td>(321 dwg)</td>
<td>(310 dwg)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Option B</td>
<td>45%</td>
<td>28%</td>
<td>10%</td>
<td>25%</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>(1373 dwg)</td>
<td>(710 dwg)</td>
<td>(284 dwg)</td>
<td>(620 dwg)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Option C</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>(2987 dwg)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Option D</td>
<td>50%</td>
<td></td>
<td></td>
<td></td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>(1000 dwg)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Option E</td>
<td>35%</td>
<td></td>
<td></td>
<td></td>
<td>N/A</td>
<td>65%</td>
</tr>
<tr>
<td></td>
<td>(1040 dwg)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(1950 dwg)</td>
</tr>
</tbody>
</table>

3.32. The representations submitted in October 2010 dealt with the original three core strategy options (Options 1, 2 and 3) and our comments on these are provided at Appendix 2 for reference.

3.33. Taking each of the additional alternative options in turn, we comment as follows:
Options A and B

3.34. Options A and B seek to distribute new development in line with existing concentrations of the Borough’s population and based on Census information.

3.35. Whilst the principle of this approach is acceptable in so far as this would afford the greatest amount of development to the largest existing settlements i.e. Clitheroe, Longridge and Whalley, on the whole it does not reflect the ability of these areas to accommodate new growth and the appropriateness of such levels in sustainability terms.

3.36. Furthermore, the apportionment to the smaller settlements (based on provision of between 10 or 20 dwellings per settlement, assuming 31 settlements in the rural area) is completely arbitrary and does not relate back to their population.

3.37. Under both options, the population figures for each of the main settlements i.e. Clitheroe, Longridge and Whalley is reportedly derived from 2001 Census statistics (referenced at Footnote 1 on Page 8), which records the Borough’s total population as 54,000, of which, 15,000 reside in Clitheroe, 8,000 in Longridge and 3,000 in Whalley.

3.38. The Council asserts that, based on this census information, the population split between these settlements is 58% (Clitheroe), 30% (Longridge) and 12% (Whalley) respectively.

3.39. Were the Council to pursue either of these options, the population figures would need to be updated to reflect the latest Census information and/or latest ONS 2008-based population projections, and the percentage apportionment to each of the settlements revised accordingly.

3.40. Notwithstanding our comments above, we object to both Options A or B in their current form on the following grounds:

1. Existing population counts should not form the sole basis of decisions about future patterns of development. Other factors need to be taken into account, including the role of existing settlements; their ability to accommodate future development; levels of access to existing services, facilities and public transport; and, the findings of up to date housing needs studies and other evidence base research. In this regard, whilst Longridge currently has a larger population than Whalley, it is not as accessible by public transport (not least it is not on the main train line between Clitheroe, Blackburn or Preston.

2. Based on current settlement boundaries and factoring in other environmental constraints i.e. the fact that the majority of the Borough is designated an Area of Outstanding Natural Beauty (AONB) and is subject to large swathes of designated Green Belt, not all of the smaller settlements in the rural area will be able to accommodate growth whilst
others will be able to accommodate some if not more than 10 dwellings. For example, Wilpshire and Billington are both ranked as key settlements within the Borough (based on the hierarchy set out in Policy G2 of the current Local Plan), however, they are heavily constrained by Green Belt.

3. The development and expansion of certain smaller settlements may not represent sustainable development. This is recognised by the Council at paragraphs 4.4 and 4.9.

4. Housing growth needs to be considered alongside economic factors to enable new housing to be provided close to jobs and in areas that have good access to jobs in order to promote sustainable patterns of development.

5. There is an over reliance on development in Clitheroe to meet the Borough's future housing needs. Focusing 50% or more of new development in Clitheroe will not address local housing needs elsewhere in the Borough, in particular the Key Service Centres of Whalley and Longridge, to the detriment of the future vitality and viability of these settlements in the longer term.

6. These options underestimate the importance of Whalley as a Key Service Centre, its role in terms of service provision for its surrounding rural hinterland and need for future housing development to meet local housing needs, in particular for affordable housing.

7. A higher level of development should be afforded to Whalley in order to ensure that adequate infrastructure provision i.e. in terms of education, drainage etc, is secured in order to support existing and new development.

8. Without understanding the overall level of housing growth required across the Borough, it is difficult to establish whether the spatial apportionment of growth advocated under Options A and B is appropriate or deliverable, in particular, to Clitheroe and Longridge which would be afforded the largest percentages of development.

3.41. Reflective of our concerns about the deliverability of Options A and B, an alternative approach to the apportionment of development is put forward by CEG later in this section.

Option C

3.42. This option is based on dispersal of development across all settlements in the Borough, to be of a scale commensurate with existing population statistics for each settlement. It is intended that the approach would be defined through a Development Management policy. We note that no such policy is provided in the Council's accompanying document 'Amended Key Statements and Development Management Policies' and on which we comment at Section 4.

3.43. The Council highlights how such a policy might be brought into effect and states:
"a scheme will only be acceptable in principle if it is less than or equal to 5% of the settlements' current population. The population statistic used will be the most recent mid-year estimate for that location, as provided by the Office of National Statistics (ONS) or 2011 Census data once available".

3.44. We have a number of concerns regarding the effectiveness of the approach advocated under Option C and object on the following grounds:

1. The approach is no different to that currently set out in the adopted Local Plan and does not provide any clear guidance on the future direction of growth in the Borough. Given the Government’s growth agenda as recognised in the draft NPPF, it is unclear how this approach would meet the aims and objectives of the Council’s overall strategy as set out in the Regulation 25 consultation.

2. It is likely to lead to more unsustainable patterns of development and a disconnect between the provision of housing and employment, with little regard to existing services provision and ability to make best use of existing infrastructure.

3. The approach implies that a greater scale of development would be permitted in areas with greatest existing populations. In accordance with our comments addressing Options A and B, whilst an area might have a large existing population, this does not infer that it is a sustainable location for further development. Other factors should be taken into consideration, including the need for housing (both at a quantitative and qualitative level) and the ability of new development to make best use of and support existing services and infrastructure.

4. The population counts provided in the consultation paper rely on 2001 Census data which is now 10 years old. The position is likely to have moved on, providing further uncertainty about the scale of future development that might be permitted within each settlement and how this might be accommodated.

5. It is unclear how the appropriate scale of development would be calculated. Using the Council’s example of a 5% threshold, is it intended that there would be a target set from the outset of the plan i.e. equated to a number of dwellings, within which applications for development would be measured against. Therefore, once this target is reached, there would be no further development in that settlement? Alternatively, is it intended to be an incremental target i.e. the appropriate scale of development is 5% of the population count at the time an application comes forward? This would allow multiple applications to come forward in a particular settlement, provided that each one promoted a level of development that was either equal to or less than 5% of the population at that time. Either way, it is unclear how much development would be afforded to each settlement (or how population is equated to number of households) or how such an approach would demonstrate that the wider aims and objectives of the Core Strategy could be achieved.
in accordance with the Government’s growth agenda and draft NPPF.

6. This option fails to recognise the importance of the Key Service Centres, in particular Whalley, and its role in terms of service provision for its surrounding rural hinterland and need for future housing development to meet local housing needs.

3.45. Under Option C, the Council advocates that it might seek to allocate parcels of land for release for future housing provision in the longer term. These would be identified through preparation of a subsequent Site Allocations DPD, once the overall Core Strategy framework has been established.

3.46. Whilst the principle of safeguarding land for future release is acceptable, such an approach needs to be related back to the overall strategy for housing development in line with the ‘plan, monitor and manage’ approach advocated in PPS3. It is currently unclear how the allocation of safeguarded parcels of land would sit with the amount of development that may or may not be afforded to each settlement.

**Option D**

3.47. This option promotes the development of a strategic site to the south of Clitheroe, where circa 50% of the Council’s total housing and employment requirements for the Borough would be accommodated.

3.48. Whilst Clitheroe represents the principle urban area and Market Town in the Borough, in the absence of clarity on the overall level of housing required it is premature to suggest that 50% of all new housing could be accommodated in Clitheroe, particularly if as a result of the NLP work the figure increases further and the overall amount of housing required to be delivered in Clitheroe significantly increases. The impact and overall implications of this need to be considered overall before advocating a 50% target to Clitheroe.

3.49. Based on the Council’s available evidence base documents, in particular, the Strategic Housing Land Availability Assessment (SHLAA) (dated November 2009) it is not evident that sufficient land is available to deliver an urban extension to Clitheroe sufficient to accommodate 1,500 dwellings (or more should the Council’s overall housing requirement increase as a result of recent work). In particular, we note that whilst a large number of sites have been promoted around Clitheroe as part of the SHLAA process, there is no evidence to suggest that more than circa 650 dwellings\(^\text{17}\) can be accommodated in this location.

3.50. The proposed site is located on the south eastern edge of the town. In critical mass terms, its development will support existing services and facilities in Clitheroe Town Centre. However, in infrastructure terms, it is likely to have a much far reaching impact, for example in terms of access to local primary school places, highways etc, to the detriment of other settlements.

\(^{17}\) Based on information contained within SHLAA Refs 14, 20 and 21.
including Barrow and possibly Whalley both of which are to the south of the town.

3.51. Furthermore, the development of 1,500 dwellings in one concentrated location on the edge of Clitheroe might result in less sustainable and accessible development than more evenly distributing that same growth across a number of other settlements, including the Key Service Centres of Whalley and Longridge.

3.52. Under Option D, there would be a requirement to accommodate the remaining 50% of housing growth within other settlements, including the Key Service Centres of Whalley and Longridge. Given their role in terms of providing access to services and facilities and their elevated status compared to other settlements in the more rural areas of the Borough, it is unclear how the remaining 50% housing requirement would be spatially distributed between these Key Service Centres and their priority for development over other smaller settlements.

3.53. A minimum quantum of development is necessary in both Whalley and Longridge in order to promote sustainable patterns of development and ensure that any necessary supporting infrastructure can be provided. Without understanding the overall housing requirement for the Borough, it is unclear whether the identification of a strategic site on the edge of Clitheroe is appropriate, and the implications of this on whether sufficient housing is subsequently afforded to the remaining Key Service Centres, in particular Whalley. Furthermore, whether the proposed pattern of development will ensure that the overall Core Strategy aims and objectives can be effectively implemented and achieved.

3.54. At this stage, we object to Option D as we do not consider it is demonstrably deliverable, not least as it relies on the development of principally a single site to meet housing and other growth needs.

**Option E**

3.55. This option promotes the development of a strategic site to the south of Barrow, where circa 65% of the Council’s total housing and employment requirements for the Borough would be accommodated.

3.56. This option represents a significant departure from the settlement hierarchy currently advocated in the Council’s adopted Local Plan (Policy G2) as Barrow is not one of the Borough’s principle settlements, rather, it is a satellite village located within the rural area between Whalley and Clitheroe, accessed primarily by car from the A59.

3.57. Whilst the village does provide some local services and is a source of limited local employment, it is not a sustainable location for a major urban extension. We object to Option E also on the following grounds:

1. The existing settlement relies on services and facilities provided within Whalley (to the
south) and Clitheroe (to the north).

2. Whilst an extension of circa 1,950 dwellings (based on the Council’s current figures) would provide a critical mass of development to support provision of some new services and facilities as part of a wider mixed use development, this would be to the detriment of the vitality and viability of existing centres at Whalley and within Clitheroe the main Market Town.

3. Development of an urban extension in Barrow would be less sustainable than in Whalley or Longridge as it would need to rely on existing public transport accessibility from Clitheroe and Whalley in order to ensure a sustainable pattern of development. Given this, development would be better located in each of these Key Service Centres rather than in a satellite village on the outskirts.

4. Based on the Council’s available evidence base documents, in particular, the SHLAA it is not evident that sufficient land is available to deliver an urban extension to Barrow sufficient to accommodate 1,950 dwellings (or more should the Council’s overall housing requirement increase as a result of recent work). In particular, we note that whilst a number of sites have been promoted around Barrow as part of the SHLAA process, there is no evidence to suggest that more than circa 1,000 dwellings can be accommodated in the proposed location.

5. The development of an urban extension at Barrow will completely change the character of this rural settlement, reducing the separation distance between Clitheroe and Whalley resulting in their coalescence and future amalgamation to the detriment of the amenity of the area. It is wholly unsustainable and will result in a greater detrimental impact than new development being located directly in either of these settlements.

6. This option relies on the delivery of development in primarily one location i.e. an ‘eggs in one basket’ approach.

**Alternative Approach to Spatial Distribution**

3.58. As set out in previous representations in 2010, CEG supports the provision of 25-30% apportionment of new housing development into Whalley. Based on the current statutory RSS requirement of 161 dwellings per annum and reflective of the proposed plan period (20 years), this equates to provision of between 805 and 966 dwellings in Whalley between 2010 and 2030.

3.59. This section represents an alternative approach to the alternative spatial options set out by the Council and as part of the earlier Regulation 25 consultation, and will enable the identified level of growth to be delivered in a more sustainable way.

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18 Based on information contained within SHLAA Ref’s 122, 123, 305 and 306.
3.60. Our previous representations provided a reasoned justification for this approach, reflecting on the Council's own evidence base which identifies the availability of future housing sites in the key settlement areas.

3.61. The following table summarises the approach advocated by CEG, reflecting on the requirement for a minimum of 3,220 dwellings between 2010 and 2030 (Scenario 1).

3.62. It also sets out the implications of an increased overall housing requirement for the Borough, based on the initial findings of the NLP work and a figure of circa 205 dwellings per annum (Scenario 2), to understand how much housing would need to be identified in each of the settlements were a higher level to be pursued and based on CEG's alternative approach to the apportionment of development.

Table 2: CEG's Proposed Alternative Spatial Distribution of Housing

<table>
<thead>
<tr>
<th>Settlement Areas</th>
<th>Amount of Housing Growth (2010 – 2030)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Scenario 1: Minimum 3,220 Dwellings</td>
</tr>
<tr>
<td>Clitheroe</td>
<td>35% - 40%</td>
</tr>
<tr>
<td></td>
<td>1,127 – 1,288 Dwellings</td>
</tr>
<tr>
<td>Longridge</td>
<td>20% - 25%</td>
</tr>
<tr>
<td></td>
<td>644 – 805 Dwellings</td>
</tr>
<tr>
<td>Whalley</td>
<td>25% - 30%</td>
</tr>
<tr>
<td></td>
<td>805 – 966 Dwellings</td>
</tr>
<tr>
<td>Other Settlements and</td>
<td>15%</td>
</tr>
<tr>
<td>Rural Areas</td>
<td>483 Dwellings</td>
</tr>
</tbody>
</table>

3.63. As set out previously, this represents a balanced approach but with a greater focus on Clitheroe and Whalley, as these settlements have better opportunities for expansion and the creation of sustainable communities, in physical terms, tying in with the existing urban grain and also with the best public transport links including main rail line and other available services.

3.64. In meeting the development needs of Whalley, CEG supports the identification of land at Lawsonsteads Farm (Ref: 1F in Option 1 and 2H in Option 2 of the Regulation 25 Consultation Paper) as an 'Area of Search'. As the Council has already identified, this site scored highly in the SHLAA and is a suitable location for a residential extension to the settlement.

3.65. The site is currently subject to application proposals for a residential led mixed use development, comprising provision of 300 dwellings (including 30% affordable housing), a new one form entry primary school and nursing home.
3.66. The proposed development represents a high quality scheme that can be delivered, that will help meet future housing needs in Whalley and have a number of significant benefits including:

- provision of high quality residential development on a sustainable greenfield site;
- help meet Council housing requirements in the short and medium term;
- deliver a range of sizes and types of housing including family homes;
- 30% affordable housing comprising a mix of unit sizes and tenures;
- provision of a nursing home to help address the requirements of a growing elderly population;
- provision of a new one form entry primary school to address existing and future education needs;
- deliver new jobs in Whalley (nursing home and school);
- provision of new public open space comprising a mix of play areas supplemented by additional landscaping;
- improvements to existing pedestrian links to Spring Wood;
- promotion of sustainable development making use of and investing in existing services and facilities; and
- help secure investment, new residents and development to underpin and strengthen Whalley’s future role as a Key Service Centre.

3.67. Whilst Clitheroe is the principal market town, Clitheroe alongside Whalley and Longridge are identified as Key Service Centres in terms of their role in providing shops, services, facilities and public transport to their immediate catchment and wider rural hinterland.

3.68. It is worth noting that the former Joint Lancashire Structure Plan (JLSP) (Adopted 2005) also identified Whalley alongside Clitheroe and Longridge as a Key Service Centre and focus for development. This was to help promote regeneration and support its role as a public transport hub for the surrounding villages and rural area.

3.69. As a Key Service Centre, Whalley has an important role in terms of service provision for the surrounding rural areas. Its growth has the potential to sustain and underpin the economy of its rural hinterland and provide improved access to housing, services, education, healthcare and employment.
3.70. Whalley has good transport links to surrounding towns and villages and is served by the mainline railway between Manchester, Burnley and Clitheroe. It also has a bus station in the centre of the village which is within walking distance of the site and offers a number of services.

3.71. In contrast, Longridge sits on the periphery of the Borough and has no rail link thereby limiting its connectivity to the remainder of the Borough.

3.72. Both Whalley and the market town of Clitheroe form part of the central core of the Borough and their future expansion will have a significant positive impact on the surrounding rural villages which they serve.

3.73. Spatially, Whalley represents a suitable and sustainable location for future growth and development.

3.74. The Core Strategy should look to the long term and include provisions showing where and when the components of the total housing requirement will be delivered throughout the stages of the plan to 2030. This is an approach endorsed recently by the examining Inspector for the Central Lancashire Core Strategy and would, for example, provide a greater certainty for developers, the public and the providers of the phased and necessary infrastructure. It would assist the monitoring and implementation of the strategy, it would set the scene for the Allocations DPD and it would accord with the guidance contained within PPS12 (paragraph 4.1) by setting out how much development is intended to take place where and when and by indicating by which means it will be delivered.

3.75. As a general point, the overall level of housing required across the Borough is significant based on the evidence available to date. This has significant implications for the apportionment of housing between settlements and the growth strategy for the next 20 years, and the Council will need to consider the implications of its evidence base in determining a preferred approach.
Forward Planning Draft Core Strategy Consultation  
Council Offices  
Ribble Valley Borough Council  
Church Walk  
Clitheroe  
BB7 2RA

By email and post
Core25@ribblevalley.gov.uk  
Our ref. SW/192137

20 October 2010

Dear Sirs

Ribble Valley Local Development Framework:  
Consultation on the Core Strategy 2010

We write on behalf of [Company Name] to submit representations in response to the Council's Core Strategy (Regulation 25) Consultation.

[Company Name] is a property investment and development company that is promoting land at Lawsonstead Farm, east of Clitheroe Road in Whalley for residential and ancillary uses (see enclosed Site Location Plan).

This site has been subject to assessment in the Council’s Strategic Housing Land Availability Assessment (SHLAA) and, more recently, formed the basis of discussions with officers and Members. The site’s development will help meet the future needs of Whalley and ensure sustainable growth in the Ribble Valley, with a focus on creating and underpinning vibrant key service centres.

It is against this context that we have reviewed the draft Core Strategy and submit our representations to the Regulation 25 draft strategy on the enclosed forms.

Key to the overall strategy is the recognition that Ribble Valley Borough Council has to ensure future growth and development is delivered in a sustainable way that meets local needs. The Core Strategy is an important document to help direct investment to meet the identified need for residential and economic growth. The Borough faces a number of challenges in this regard and CEG is keen to assist the Council in the delivery of their Strategy and overall Vision for the Borough.

We trust our comments will be taken fully into account in the preparation of future drafts of the Core Strategy.

Yours faithfully

[Signature]

Enc: Comment Forms  
Site Location Plan  

cc: [Other Recipients]
CORE STRATEGY CONSULTATION:
(Regulation 25)
CONSULTATION COMMENT SUBMISSION FORM

The first stage of Ribble Valley Borough Council's Core Strategy is currently out for consultation. If you would like to submit any comments to us regarding the Core Strategy, please fill in this form and return it to us. Comments made will be considered prior to the next formal stage of consultation of the Core Strategy. Further consultation will take place before the plan is finalised.

Completed forms can be returned to Core25@ribblevalley.gov.uk or the address given below. Please ensure that we receive comments no later than 5pm WEDNESDAY 20TH OCTOBER 2010.

CONTACT DETAILS: to be used for all future potential correspondence

Name: Sarah Williams
Organisation: *Applicable
Address: *Applicable
Postcode:
Daytime Tel:
Fax No: 01254 0011
Email Address: *Applicable
Signature:
Date: 20 October 2010

Please return all completed forms to the following email address:
Core25@ribblevalley.gov.uk

Or by post to:
CORE STRATEGY CONSULTATION
Forward Planning
Development Services
Council Offices
Ribble Valley Borough Council
Church Walk
Clitheroe
BB7 2RA

Please note that as part of the legal requirements of the process we have to make comments received, including the name of respondents, available for public viewing. Addresses and all other personal details will NOT be made public. All comments received will be held on the Council's LDF database in accordance with the Data Protection Act 1998.
Section 2.1: A Spatial Portrait of the Ribble Valley

Paragraph 2.1.5 refers to Clitheroe and Longridge as the 'Key Service Centres' within the Borough. However, Appendix 5 (Glossary of Terms) provides a definition for Key Service Centres and states:

"These are seen as the largest settlements in the Borough. For the purposes of this study this relates to Clitheroe, Longridge and Whalley."

Whalley is the third largest settlement in the Borough by population and has an important role in terms of service provision for the rural area and in diversifying the rural economy.

The former Joint Lancashire Structure Plan (Adopted 2005) and former North West Regional Spatial Strategy (RSS) (Adopted 2008) identified Whalley alongside Clitheroe and Longridge as a Key Service Centre and focus for development. This was to help promote regeneration and support its role as a public transport hub for the surrounding villages and rural area.

The Employment and Retail Study undertaken by the BE Group (2008) also assesses employment and retail provision on this basis.

Whalley clearly is a Key Service Centre as identified in Appendix 5, so paragraph 2.1.5 should also include Whalley when referring to the Key Service Centres in the Borough.
Section 2.3: LDF Evidence Base

We note that the Council has undertaken and is continuing to update a range of evidence base research. In particular, the Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market Assessment (SHMA) assess future housing requirements on the basis of the North West Regional Spatial Strategy (RSS) requirement of 161 dwellings per annum. We note that whilst the RSS has since been revoked, there is continued Council support for this target figure which is to be treated as a minimum rather than a ceiling requirement.

With regard to the BE Group’s Employment Land and Retail Study (2008), this forms an important part of the evidence base. We note it identifies that the Borough should seek to identify an additional six hectares of employment land, two hectares of which could be accommodated as an extension to Sidings Business Park. This would help Whalley grow its economic base over the plan period and is supported.

In respect of their findings for the need for additional convenience retail floorspace, we have a number of concerns with the evidence presented as follows.

The report only looks forward to 2018 and not the plan period and bases its analysis on constant market shares. Because of the limited provision of convenience floorspace in the Borough, the majority of convenience spend is lost to stores outside of the Borough. This could be rectified in a sustainable manner through promotion of additional foodstores in the key service centres, leading to a reduction in the need to travel.

This is particularly true in Whalley where there is only one very small store. The study identifies that, of the £60 million available spend in Zone 3 (in which Whalley is the principal town) only £0.03 million is spent in Whalley in 2010. At the same time, £24.3 million is being spent at supermarkets in Clitheroe with approximately £35 million therefore being spent elsewhere outside of the Borough in 2010.

Because the BE Group assume a constant market share, they conclude that there is no need for additional floorspace in Whalley (ie, constant market share increases growth from £0.03m to about £0.037m), yet clearly the evidence identifies that there is a significant convenience spend from residents in the immediate locality (circa £35m) being spent outside of the Borough, a proportion of which could be diverted to support provision of new floorspace in the Town in a sustainable way, helping to underpin the service centre.

The Council’s Core Strategy should seek to increase the Borough’s overall retail market share to well over the current 29% identified by the BE Group, which is very low indeed. This should be reflected in positive planning for additional retail floorspace in the key service centres and in accordance with the advice in PPS4.
Section 3.2: The Core Strategy Vision

CEG supports the Council's overall vision for the Ribble Valley and the need to manage delivery of growth and development with environmental and other historic considerations. A key part of the vision is to support vital and vibrant market towns and villages acting as thriving service centres, meeting the needs of residents, businesses and visitors. For this to be achieved and sustained, the service centres need investment and to be targets for growth to meet the identified local needs.

Paragraph 3.2.6 makes reference to the physical, social, environmental and economic regeneration of Clitheroe, Longridge and Whalley being supported, together with existing retail businesses, whilst also ensuring a high quality retail offer in the key service centres and smaller village settlements. CEG supports the Council's recognition of these factors in planning for sustainable growth and development.
Section 3.3: Strategic Objectives

Paragraphs 3.3.3 and 3.3.4 identify the need to provide sufficient housing to meet local needs, including provision of adequate affordable housing. In order to achieve these strategic objectives, the Council and community must recognise the requirement to identify sufficient land around the Key Service Centres to ensure future development is sustainable and able to address identified local needs. CEG’s interests at Lawsonstead Farm will help achieve these objectives for Whalley and the wider Borough.

Paragraph 3.3.5 recognises that the Council needs to promote employment opportunities to help sustain economic growth and provide jobs near where people live with a balance of land uses. As a consequence, the Council should be seeking to retain existing employment sites, where possible and commercially viable, and promote new provision either on or adjacent to existing sites.

In the case of Whalley, there is the opportunity for provision of additional employment land near to the train station and adjacent to the existing employment provision at The Sidings. The Council should seek to protect and identify this opportunity to help meet local employment needs.

Paragraph 3.3.7 recognises the need to support existing retail businesses whilst improving the current retail offer to ensure the continued vitality and viability of existing retail areas. Although Whalley is a Key Service Centre, it does not have a defined retail core and has a limited convenience retail offer, requiring residents to travel to nearby Clitheroe or Longridge for convenience shopping. In planning for sustainable growth, the Council should encourage and identify some retail development alongside new housing in Whalley to meet local needs. This would accord with the principles of sustainable development as set out in PPS1 and PPS3 and help generate employment in accordance with PPS4.

Paragraph 3.3.9 promotes improved accessibility and service delivery to address rural isolation, including in respect of access to services, support for local employment and affordable housing. In seeking to promote sustainable development and realise this objective, the Council should seek to focus new development into the identified Key Service Centres which have best access to services and facilities including public transport provision, which should be the focus for future investment and improvements.

Some small scale local development is likely to be required in the smaller more rural settlements to meet specific local housing needs, but to deliver the vision, the majority of growth should be focused on the Key Service Centres. A dispersed approach would undermine the principles of sustainable development and the objective of ensuring vibrant Key Service Centres.
Section 4 Development Strategy

Paragraph 4.1.3 sets out three development strategy options as follows:

"Option 1: Development will be directed towards the service centres comprising Clitheroe, Longridge and Whalley, including the opportunity to expand their existing settlement limits to accommodate residential and employment growth. Limited development will be accommodated through appropriate village growth and/or expansion where appropriate.

Option 2: Longridge will be viewed as a strategic growth area for the Ribble Valley and a focus of development striving to achieve a competitive and sustainable economy, providing opportunities not only for economic development but also for social and environmental improvement.

Option 3: Development in the Borough will be accommodated through the strategic release of sites that can accommodate high levels of development. A number of strategic sites will be released to create opportunities for new local communities and areas of growth whilst supporting the protection of the wider environment for future generations".

All three options are predicated on a requirement for provision of circa 1,500 dwellings. This figure is derived from an assessment of the Council’s housing land supply position as at 31 March 2010, against the former RSS requirement of 2,900 dwellings between the period 2003 and 2021. It takes into consideration completions since 1 April 2003 and commitments (i.e. sites with planning permission either under construction or not started). This represents the residual requirement between 1 April 2010 and 31 March 2021.

[NS: Based on the Council’s 2010 Housing Land Monitor the actual figure is 1,436 and it is this figure that we have used in our subsequent calculations].

On the basis that the Core Strategy is intended to be a plan covering a 15 year period (in accordance with the requirements of PPS3, paragraph 50) and the Council, at Section 6, identifies a housing target of at least 161 dwellings per annum, the reported requirement of 1,500 is incorrect. The actual amount of housing land required for the plan period of 2010 to 2025 based on the RSS methodology is at least 2,080, calculated as follows:

RSS Residual Requirement 2010-2021: 1,436
Additional Annual Requirement 2021-2025: +644 (161 x 4)
Total Requirement 2,080

This should be treated as a minimum requirement (Scenario 1 referred to below).
Section 4 Development Strategy Cont...

In meeting the development needs of Whalley, CEG supports the identification of land at Lawsonsteads Farm (Ref: 1F in existing Option 1 and 2H in Option 2) as an ‘Area of Search’. As the Council has already identified, this site scored highly in the Strategic Housing Land Availability Assessment (SHLAA) and is a suitable location for a residential extension to the settlement.

The benefits of this sustainable extension will be fully communicated through ongoing liaison with Council officers and the local community. The site is able to contribute to meeting local housing needs both in quantitative and qualitative terms over the short to medium term, providing high quality development whilst respecting the character of the area and environment.

Whalley is a Key Service Centre and has an important role in terms of service provision for the surrounding rural areas. Its growth has the potential to sustain and underpin the economy of the rural hinterland and improve access to housing, services, education, healthcare and employment. It has good transport links to surrounding towns and villages with scope for further enhancement supported by new development.

On this basis, it represents a suitable and sustainable location as a focus for future growth and development. This should be reflected through the apportionment of housing we advocate in the Council’s strategy and in order to support future infrastructure provision.

Based on the aims and objectives set out at paragraph 4.1.3 with regard to each of the options, CEG makes the following comments:

- Whilst the principle of focusing development into the Key Service Centres of Clitheroe, Longridge and Whalley is supported, CEG objects to the quantum of development proposed in Option 1 and overall apportionment of growth. An alternative approach (Scenario 2) is proposed based on a minimum of 2,415 dwellings between 2010 and 2025 (as set out above).

- CEG objects to Options 2 and 3 on the following grounds:
  
  - Both Clitheroe and Whalley form part of the central core of the Borough and their expansion will have a greater positive impact on the surrounding rural villages which they serve.
  
  - Whilst Longridge is the second largest settlement in terms of population size, it sits on the periphery of the Borough and has no rail link. On this basis, the overall apportionment to Longridge should be carefully managed. Option 2 places too much reliance on Longridge in this regard.
  
  - Whilst there is likely to be a limited requirement for some new housing development in the smaller villages during the plan period, focusing the majority of new development away from the Key Service Centres does not represent good planning as it is not making best use of and build on existing services, facilities and opportunities to promote sustainable patterns of development. This approach detracts from the Council’s overarching vision for the Borough and will affect the ability of the Council to satisfy its strategic objectives. Option 3 is unsustainable.
Section 5: Environment

CEG supports the Council’s continued protection of existing areas of Green Belt and Areas of Outstanding Natural Beauty (AONB). In particular, the Borough has large expanses of open countryside around the Key Service Centres of Clitheroe, Whalley and Longridge and, in seeking to promote sustainable growth, the focus of development should be into these areas, negating the need for Green Belt release in the plan period. The Council’s proposed development management approach to new development in the open countryside is consistent with PPG2 (Green Belts).

With regard to the Forest of Bowland AONB, CEG also supports its continued protection, conservation and enhancement and the development management approach set out with regard to proposals both within and adjacent to this area. However, the Council should make it clear that its protection and conservation does not preclude new development, and recognise that it can often facilitate the implementation of schemes which secure the longevity and inherent value of an area.

In terms of the approach to Sustainable Development, CEG supports the overall principles which comply with the guidance set out in PPS1. However, with regard to promoting on site renewable energy, as set out at paragraph 5.2.4, the policy wording itself should recognise that the ability to meet this requirement on site will need to be balanced with ensuring that the wider environment is not adversely affected.
Section 6: Housing

In terms of the Council’s statement on ‘Housing Provision’, we offer the following comments:

CEG supports the Council’s continued promotion of provision of at least 161 dwellings per annum. This is consistent with the approach set out in the former NW RSS which was supported by the Council and underpinned by a robust evidence base. This has been endorsed by Members of the Planning Committee on 17 June 2010. The approach is also reflective of the Council’s own evidence base regarding future housing requirements and in line with national forecasts regarding population projections and demographic changes.

However, the Council should clarify that the time period which this minimum target relates is 2010 to 2025, in accordance with the overall time period for the Core Strategy. Based on the preferred option set out, this results in a total requirement of a minimum of 2,415 dwellings (Scenario 2) between 2010 and 2025.

As the Council correctly sets out, it will seek to identify suitable sites for residential development that are deliverable over a five year period, in accordance with the requirements of PPS3, and ensure that sufficient housing land is identified for the full 15 year period and beyond.

With regard to the statement on ‘Housing Balance’, CEG supports the approach set out and recognises that new residential development needs to adequately address identified local requirements.

The Council’s statement on ‘Affordable Housing’ sets out a requirement for provision of 30% affordable housing on a range of sites across the Borough. Whilst the overall principle of this level of provision is supported, the Council’s approach to determining a reduction in the levy is unduly restrictive and does not enable consideration of the implication of other potential planning obligations, i.e. education, in negotiating the overall level of provision. The delivery of sustainable growth in the Key Service Centres will necessitate investment in local services and infrastructure that could affect the ability to deliver as much as 30% affordable housing. This will be a material consideration in the determination of applications and the policy should ensure the flexibility to enable delivery.

In any event, any policy should be underpinned by a robust assessment of the viability of delivering affordable housing in the Borough in accordance with PPS3, paragraph 29. In addition, up to date housing needs surveys which demonstrate the needs of a particular area.

In accordance with the Council’s later statement on planning obligations, the Council identifies that affordable housing provision is a top priority. However, each of the Key Service Centres will have their own infrastructure demands including affordable housing, highways infrastructure, parking, access to health and education. The strategy needs to allow sufficient flexibility for consideration of these factors together to ensure that development can assist meeting local needs in the most effective and sustainable way.
Section 7: Economy

In terms of the Council’s statement on ‘Business and Employment Development’, we make the following comments:

CEG supports the overall approach to promoting land for employment use but the Council should make clear how much land is required. The evidence base suggests that this is in the order of 6 Ha, however, this is not set out in the strategy and unlike the approach taken to identifying potential ‘areas of search’ for housing, the strategy should explain further how future employment requirements might be accommodated.

Paragraph 7.1.4 identifies that the Key Service Centres of Clitheroe, Longridge and Whalley are the Council’s preferred locations for new employment development. CEG supports the approach to directing employment development into the principle settlement areas in seeking to align jobs with homes in key areas.

Following the approach to apportionment as set out with regard to housing, future employment land provision might be accommodated as follows:

<table>
<thead>
<tr>
<th>Settlement Area</th>
<th>Core Strategy Requirement (6 Ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clitheroe</td>
<td>35% - 40%</td>
</tr>
<tr>
<td></td>
<td>(2.1 – 2.4 Ha)</td>
</tr>
<tr>
<td>Longridge</td>
<td>20% - 25%</td>
</tr>
<tr>
<td></td>
<td>(1.2 – 1.5 Ha)</td>
</tr>
<tr>
<td>Whalley</td>
<td>25% - 30%</td>
</tr>
<tr>
<td></td>
<td>(1.5 – 1.8 Ha)</td>
</tr>
<tr>
<td>Other Settlements and Rural Areas</td>
<td>15%</td>
</tr>
<tr>
<td></td>
<td>(0.9 Ha)</td>
</tr>
</tbody>
</table>

With regard to how future employment development might be accommodated in Whalley, we note that land adjacent to the existing Sidings employment area is identified in the BE Group Employment and Retail Study (2008) as a suitable location for future employment development in Whalley in the medium term.

Overall, in this context, CEG supports draft policy ‘DMB1: Supporting Business Growth and the Local Economy’ which takes this approach.

In addition and in accordance with PPS4, in planning for future employment development, the Council should provide flexibility for a range of employment generating uses to come forward, aside from the traditional B1, B2 and B8 uses.

CEG supports the Council’s statement regarding ‘Development of retail, shops and facilities’ which seeks to promote development that supports the retail function of the Key Service Centres of Clitheroe, Longridge and Whalley.

Cont...
Section 7: Economy Cont...

In particular, draft policy 'DMR2: Shopping in Longridge and Whalley' provided at Appendix 4 recognises the contribution that further retail provision in these areas could make to meeting the service needs of the settlement. As set out previously, Whalley, does not have a defined retail core and has a limited convenience retail offer, requiring residents to travel to nearby Clitheroe or Longridge for convenience shopping.

In planning for the sustainable growth of Whalley, and as set out above in respect of our comments on the BE Group report, the Council should identify further retail development, alongside new housing and employment. Not only does this approach accord with the principles of sustainable development as set out in PPS1 and PPS3, but is also in accordance with PPS4, which recognises that retail is an employment generating use itself and therefore could help support the continued economic growth of Whalley.
Section 8: Delivery Mechanisms and Infrastructure

CEG recognises the importance the Council places on planning obligations and notes the proposed hierarchy of priorities. Whilst we recognise this overall priority, in certain locations the priority could feasibly be different and the policy should reflect this through a flexible approach in terms of provision of affordable housing, highway improvements, open space and education. In Whalley, for example, there is a particular need for additional education provision which might be considered as great a priority as affordable housing in that instance.

As set out in our comments at Section 6, the Council needs to provide sufficient flexibility for reconsideration of these priorities when determining specific development proposals, in order to factor in any provisions that might have previously come forward in addressing an identified need.

With regard to ‘Transport Considerations’, CEG supports the approach set out in accordance with the requirements of PPS1, PPS3 and PPG13.
Alternative Options Consultation
Forward Planning
Ribble Valley Borough Council
Church Walk
Clitheroe
BB7 2RA

FAO: Mr Colin Hirst

5 August 2011

Dear Sirs

CORE STRATEGY: GENERATION OF ALTERNATIVE DEVELOPMENT STRATEGY OPTIONS

We write on behalf of [redacted] with regard the current consultation on alternative development options for the Core Strategy.

We are in the process of preparing representations addressing the revised options presented but note that, for the purpose of this consultation, the Council has adopted the current Regional Spatial Strategy (RSS) target of 161 dwellings per annum as the housing requirement for the Ribble Valley over the plan period.

However, the Council has more recently derived a locally based housing target for the Borough through work prepared by NLP to inform preparation of the Core Strategy as part of the evidence base. This work was commissioned partly in response to the high volume of representations received by local residents highlighting concern about the overall housing target.

NLP’s report is due to be presented to Planning Committee next week (11 August) and considers a number of different growth scenarios. It concludes that the housing requirement should be between 190 and 220 dwellings per annum.

The officer’s report highlights that further work is required to agree the figure for the purpose of advancing the Core Strategy. On this basis, it is not currently known whether the Council will seek to promote a higher housing figure to the current statutory requirement of 161 dwellings per annum as set out in the RSS.

Given the amount of housing required is a sensitive issue, the Council should have allowed sufficient time to consider the NLP findings and agreed the approach to the target figure, prior to pursuing consultation on alternative Core Strategy options that deal with apportionment based on a figure which could well change significantly. This concern is reaffirmed by the findings of the NLP work which is not conclusive for the purposes of advancing the Core Strategy.

The apportionment of housing to individual settlements will need to be guided by evidence of housing need/demand (both in quantitative and qualitative...
terms) and marred with evidence of the availability of sites (and supporting infrastructure) in those settlements, in order to ensure that the overall apportionment of development and options presented are achievable. This is required by guidance contained at paragraph 4.38 of PPS12. To take any other approach is unsound as the options are not being properly tested.

From our discussions with officers, we understand that the Council is satisfied that the current consultation is valid and can proceed without confirmation of the overall housing requirement on the basis that the purpose of the consultation is to focus on alternative options for the spatial distribution of growth. However, the overall level of housing required and subsequent apportionment of housing are inextricably linked and the outcome of this work should have been factored into this consultation.

So, on the findings of the NLP work, notwithstanding the Council’s intention to publish the NLP report for consultation, the Council should seek to extend the consultation period on the Alternative Core Strategy Options to reflect the implications of the NLP work and how it relates to the spatial distribution of growth, before advancing a Revised Draft Strategy (Regulation 27 Consultation). This will ensure that there is sufficient opportunity for local residents, stakeholders and those affected by the Council’s proposals, to consider the implications and formally respond with any comments.

Please note that this letter does not represent our only submission in response to the consultation. More detailed comments will follow in advance of the 12 August deadline.

Yours faithfully

cc
Alternative Options Consultation
Forward Planning
Ribble Valley Borough Council
Church Walk
Clitheroe
BB7 2RA

12 August 2011

Dear Sir/Madam

PLANNING POLICY CONSULTATION: ADDRESSING HOUSING NEED IN RIBBLE VALLEY

On behalf of [Name], please find enclosed representations prepared in response to the consultation paper ‘Addressing Housing Need in Ribble Valley’ (July 2011).

[Name] is a property investment and development company that is promoting land at Lawsonstead’s Farm, east of Clitheroe Road in Whalley for a residential led mixed use development. An application for the site’s development is currently being considered by the Council (Application Ref: 3/2011/0111).

It is against this context that we have reviewed the draft affordable housing policy and enclose a Statement detailing our comments.

We trust that these comments will be taken into account but should you require clarification on any of the points made, please do not hesitate to contact us.

Yours faithfully

Enc: Representations
cc: [Name]
Addressing Housing Need in Ribble Valley Consultation July 2011

Representations on behalf of Commercial
Addressing Housing Need in Ribble Valley Consultation July 2011

Representations on behalf of

August 2011
Addressing Housing Need in Ribble Valley Consultation July 2011

Representations on behalf of Commercial Property Group

Contents

1. Introduction 1

2. Response to Affordable Housing Policy Proposals 2
Addressing Housing Need in Ribble Valley Consultation July 2011

Representations on behalf of Commercial Benefits Claim

Appendices

Appendix 1
Site Location Plan
1. Introduction

1.1. This Statement has been prepared on behalf of Commercial Estates Group in response to Ribble Valley Borough Council's (RVBC's) consultation on its Addressing Affordable Housing Needs paper, published July 2011.

1.2. CEG is promoting land east of Clitheroe Road (known locally as 'Lawsonsteads') in Whalley for development. An outline application for a mixed use residential led scheme was submitted to RVBC in February 2011 (Ref: 3/2011/0111) and is currently being considered by the Council. A site location plan is contained at Appendix 1.

1.3. It is against this context that the following sections of this Statement have been prepared, reflecting not only CEG's commercial interests in this site but the effectiveness of the proposed approach to securing affordable housing provision in the Borough.
2. Response to Affordable Housing Policy Proposals

Section 2.2.2 Affordable Homes for Shared Ownership

2.1. The proposed policy document advocates that in settlements of less than 3,000 population, owners of shared ownership properties can only obtain a maximum 80% share in those properties, to ensure that the property is never owned outright and remains in shared ownership in perpetuity.

2.2. Whilst the principle of this approach is acceptable as set out in Paragraph 38 of the DCLG Guidance: Delivering Affordable Housing (November 2006), greater clarity is needed as to which settlements this approach would apply. The policy currently states:

"The reference to settlements for the purposes of this memorandum relates to villages as defined in the adopted local plan".

2.3. However, on the basis that the local plan will be superseded by the emerging Core Strategy, the policy should include as an appendix a list of those settlements to which this approach would apply.

Section 2.2.3 Affordable Homes for Rent

2.4. This section sets out how the Council proposes to apply the Government’s new ‘Affordable Rent’ model in terms of delivery of affordable housing. However, the current wording would benefit from some further clarity, i.e. to explain how it relates to the offer of shorter term tenancies at a rent higher than social rent (up to 80% of local housing market rents) in accordance with paragraphs 2.5 to 2.8 of the DCLG consultation paper ‘Local Decisions: A Fairer Future for Social Housing’ (November 2010).

Section 3: Affordable Housing Thresholds

2.5. The Council’s draft policy carries forward the approach to securing housing provision as set out in the Affordable Housing Memorandum of Understanding (July 2009) i.e. seeking to secure 30% provision on sites of 10 or more dwellings (or 0.5 Hectares or more irrespective of the number of dwellings) in Clitheroe and Longridge, with the threshold reduced to developments of 5 or more dwellings (or 0.1 Hectares or more) in all other locations. The policy states:

"The Council will only consider a reduction in this level of provision to a minimum of 20% only where supporting evidence, including a viability appraisal fully justifies a lower level of provision".

2.6. Whilst the delivery of affordable housing is essential to secure a balanced housing market across the Borough, as recognised in the Council’s Strategic Housing Market Assessment
(SHMA) (December 2008) at the last paragraph on page 102 within Section E (12: Conclusions and Recommendations), in setting thresholds the Council should take into account the economic viability of developments in current housing market conditions. This is also required by PPS3 (June 2011) at paragraph 29.

2.7. To date, no work has been undertaken to consider the viability of delivery of affordable housing, in particular, to reflect the need for developments to balance the costs of affordable housing delivery against other infrastructure requirements i.e. education, highways etc.

2.8. In advance of the policy being formally endorsed and implemented by the Council as a material consideration in determining future planning applications, the Council should undertake a robust assessment of viability based on up to date housing needs surveys across the Borough.

**Section 5: Accommodation for the Elderly**

2.9. The Council's draft policy introduces a requirement for the provision of elderly persons accommodation at a rate of 15% of the total number of dwellings proposed on eligible affordable housing sites. The draft policy stipulates that this requirement should be met by way of provision of bungalows.

2.10. As set out above in terms of the general policy approach, we note that the proposed introduction of an elderly persons requirement has not been underpinned by any viability assessment and therefore is contrary to guidance contained within PPS3.

2.11. In terms of the approach itself, whilst there is clear evidence to suggest that the Council has an ageing population and a need for smaller elderly and extra care accommodation, the Council's SHMA identifies that there is currently a range of affordable elderly persons accommodation available, not all of which is in the form of bungalows (SHMA, 'Supported Housing Lets' table, page 91). Therefore, it is unclear why the Council is stipulating that any elderly persons accommodation provided in accordance with the draft policy ought to take this form.

2.12. The draft policy should be revised to be sufficiently flexible to allow for different house types to come forward in meeting elderly person requirements.

**Section 4.1.1 Phasing On Site**

2.13. The draft policy advocates that, in terms of delivery, all of the affordable units are completed on site and ready for occupation prior to completion of 50% of the market housing.

2.14. Again, the draft policy wording should be updated to allow flexibility in the approach on larger schemes, reflective of the fact that there are likely to be other upfront infrastructure requirements which will draw on the viability of development of a site and might preclude the
provision of all market housing on site, prior to completion of 50% of the market housing.

2.15. The Draft National Planning Policy Framework (NPPF) (July 2011) highlights the importance of ensuring viability and deliverability and states:

“To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, local standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and on-site mitigation, provide acceptable returns to a willing land owner and willing developer to enable the development to be deliverable” (Paragraph 39).

2.16. Furthermore, subject to the size of the site and overall phasing strategy, it might not be physically feasible to deliver all of the affordable housing upfront in this way, subject to the proposed build programme and how a site is parcellled for development. This needs to be reflected in the wording of the draft policy.
Forward Planning  
Ribble Valley Borough Council  
Council Offices  
Church Walk  
Clitheroe  
Lancashire  
BB7 2RA  

By email and post  
review@ribblevalley.gov.uk

16 December 2011  
let.061.SW.CH.01920137

Dear Sirs

PLANNING POLICY CONSULTATION: HOUSING NUMBERS REVIEW

On behalf of [Redacted], please find enclosed representations prepared in response to consultation on the study undertaken on behalf of Ribble Valley Borough Council (RVBC) by Nathaniel Lichfield and Partners (NLP), assessing the future housing requirement for the Borough.

[Redacted] is a property investment and development company that is promoting land at Lawsonstead’s Farm, east of Clitheroe Road in Whalley for a residential led mixed use development. An application for the site’s development is currently being considered by the Council (Application Ref: 03/2011/0111).

[Redacted] has previously submitted representations to the Council with regards the emerging Local Development Framework (LDF), in particular, its Core Strategy. We note that the Council is due to undertake further consultation on the proposed direction of travel in the Core Strategy, in January. It is against this context that we have reviewed the NLP study and detail below our comments. However, we reserve the right to comment on the study further as the Core Strategy evolves and the findings of the NLP study inform the Council’s decision making process.

General Comments

Timing of consultation

The NLP Study is an evidence base document intended to inform decision making and preparation of the Core Strategy. In particular, it is important in informing future decisions about levels of housing growth, and the implications of this on other parts of the strategy including the need to identify strategic sites/locations for development, the apportionment of development to individual settlements and the relationship between housing and economic growth and need for additional employment land.

On this basis, it is disappointing to note that the Council did not publish this study earlier i.e. in advance of publication of the Core Strategy Alternative Options paper and associated draft Key Statements/Development Management
Similarly, we note that the Council has recently presented a Core Strategy Topic Paper (Discussion on the Preferred Option) to Members of the Planning Committee (8 December) which considers the future direction of travel within the core strategy. In particular, the apportionment of growth to settlements across the Borough.

The paper is explicit in identifying that it represents the Council's preferred option for the Core Strategy which will be taken forward for further consultation in the 2012. Furthermore, at paragraph 1.2 it sets out in no uncertain terms the implications of the preferred strategy on the need for residential development across the Borough.

However, it fails to recognise the findings of the study work undertaken by NLP or indeed that the work has even been commissioned. Given the importance of the NLP study and significance of its findings to the future Core Strategy, the timing and approach is wholly inconsistent and seems to witness already a complex planning process.

The accompanying report to Members highlights that the topic paper does not have any statutory weight and we would agree with this, not least as it fails to recognise the NLP study work at all; the implications of its findings on the Council's growth strategy; and, on the basis that the NLP study consultation period is only concluding after the report was considered by the Council's Members.

Notwithstanding the findings of the study, to date the Council has failed to recognise the role this study has in informing future growth decisions.

**Report Specific Comments**

In establishing a gross housing requirement for the Borough, NLP has identified and agreed with the Council a number of scenarios based on past trends and the baseline demographic, economic and housing context of the Borough to reflect the potential scale of future growth.

Based on this analysis and taking into account constraints on development delivery, NLP recommends that the dwelling requirement for the Borough should be between 190 and 220 dwellings per annum between 2008 and 2028 (this being the proposed timeframe for the emerging Core Strategy). The report suggests that this level of housing development would see roughly no change in the size of the local workforce.

NLP advise against the proposed figure falling below this range and state:

"This would be unlikely to allow for the provision of a suitable level of affordable housing in the Borough; nor would it allow the Borough to pursue its economic growth objectives without potentially encouraging unsustainable levels of in-"
The scenarios identified and tested as part of the NLP study are, in broad terms, representative of the options available to the Council in determining future levels of housing growth. However, we do have a number of concerns regarding the baseline data used to underpin some of the scenarios tested, in particular, the housing projections which assume zero employment growth (provided in Appendices A and B of the NLP study), and the implications these have in ensuring a robust level of housing is planned for moving forwards.

Our concerns are underpinned by an independent report commissioned by CEG to inform representations on the LDF and its supporting evidence base. We enclose a summary briefing note prepared by Justin Gardner Consulting (JGC) which highlights key areas of concern associated with the NLP study findings based on the outcomes of this independent report.

The key points to note are as follows:

- The NLP figures in terms of population projections result in a housing requirement which is lower than the latest ONS projections (2008). This has significant implications on the resulting housing target which, based on the ONS projections is in the order of 260 dwellings per annum, much higher than the NLP recommended target range.

- Based on the results of JGC's work, the NLP recommended housing delivery range of 190 to 220 dwellings per annum will result in a decrease in employment levels rather than achieving zero growth.

- It also falls short of the affordable housing target identified in the Council's Strategic Housing Market Assessment (SHMA) (2008) which identifies a requirement for an additional 284 affordable or social rented dwelling units per year to meet housing need across the Borough. Whilst it is accepted that this target exceeds the total housing requirement for the Borough (as set out in the Regional Spatial Strategy) (RSS) and is not a binding target, it highlights the scale of affordability issue in the Borough which will need to be addressed through emerging policy. This needs to be borne in mind when determining the appropriate level of annual housing growth required.

- Based on the NLP projections, there will be a significant fall in the number of people aged 5-10 (the key primary school age group) equivalent to nearly 500 potential pupils. This could have a notable impact on some local communities and again highlights that a housing target in the range put forward by NLP will not result in sustainable long term growth.

- Factoring in past build rates has a notable impact on projected future annual housing requirements, in particular, we note that past build rates since 2008 have been well below the RSS minimum annual housing target with a total of 170 dwelling units completed between 2008 and 2011. Taking the lower end of the NLP range (i.e. 190 units) and adding the shortfall in delivery since 2008 onto the requirement for the remainder of the plan period (i.e. 2011 to
2028) would require an increased level of housing delivery at a rate of 214 dwellings per annum. At the higher end of the range, this increases to 249 dwellings per annum. This demonstrates that taking the NLP approach, the target range should be a minimum of 214 to 249 dwellings per annum.

- We note that NLP disregards the shortfall in completions between 2008 and 2011 in so far as suggesting this level of housing delivery is not representative of the total level of growth the Borough has previously achieved. On this basis, they rely on a figure of 225 dwellings per annum (based on pre-2004 completion rates). This approach supports the findings of JGC’s work and the need for the target to be higher than the 190 to 220 dwelling range currently being put forward.

- Irrespective of the actual future housing target carried forward, any shortfall in delivery relevant to the plan period should be factored in. I.e. if the Core Strategy period is 2008 to 2028, the housing target should be applied to the full period and completions to date (i.e. at the time of adoption) be factored in when calculating the residual requirement for the remaining plan period. Particularly when, in this case, the number of completions achieved since 2008 falls well below the current adopted target set out in the RSS notwithstanding the higher level of growth being promoted by NLP (when compared to the RSS figure).

- There are still concerns about whether this level of housing growth will sustain employment levels, notwithstanding whether the Council has aspirations for economic growth. Based on the findings of JGC’s work and assuming zero employment growth, the annual housing target would need to be between 271 and 309 dwellings (factoring in the shortfall in completions between 2008 and 2011) rather than the 190 to 220 dwelling range proposed by NLP.

Conclusion

In summary, the proposed range of 190 to 220 dwellings per annum is not supported by credible evidence, in particular, given the differences between NLP’s population projections and those prepared by JGC using ONS datasets.

On this basis, the future annual housing requirement for the Borough should be in the order of between at least 270 and 310 dwellings (factoring in the shortfall in completions between 2008 and 2011) across the plan period.

We suggest that the Council revisits the findings of the NLP work based on the scenarios tested, prior to agreeing the proposed annual housing target.

As set out earlier, this is essential in ensuring that the evidence base underpinning the emerging Core Strategy is robust and that the right levels of growth are planned for in a sustainable manner. We will be commenting further in this regard when the next stage of the Core Strategy is published for consultation.
We trust that these comments will be taken into account but would he happy to discuss any issues arising, with the Council directly.

Yours faithfully

[Signature]

Enc: Briefing Note prepared by [Signature] Consulting on behalf of [Name]

cc: [Signature]
National Planning Policy Framework - Presumption in favour of sustainable development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that framework indicate that development should be restricted.
### Table 1 - Apportionment based on Minimum Housing Target (210 dwellings per annum)

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Number of houses to be provided (% of 3,080)(^1)</th>
<th>Number of dwellings already completed / permission granted for each 'settlement' / area (based on Parish)</th>
<th>Unadjusted residual (less number already completed / permission granted)</th>
<th>Longridge Adjustment (^2)</th>
<th>Proposed Strategic Site - 1,040 dwellings</th>
<th>Residual number of houses required for each settlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clitheroe</td>
<td>1,786</td>
<td>282</td>
<td>1,504</td>
<td>464</td>
<td>464</td>
<td>464</td>
</tr>
<tr>
<td>Longridge</td>
<td>893</td>
<td>75</td>
<td>818</td>
<td>618</td>
<td>618</td>
<td>618</td>
</tr>
<tr>
<td>Whalley</td>
<td>400</td>
<td>132</td>
<td>268</td>
<td>268</td>
<td>268</td>
<td>268</td>
</tr>
<tr>
<td>Other Settlements</td>
<td>1,120</td>
<td>504</td>
<td>616</td>
<td>816</td>
<td>816</td>
<td>816</td>
</tr>
<tr>
<td><strong>Standen Strategic Extension</strong></td>
<td><strong>Total</strong></td>
<td><strong>993</strong></td>
<td><strong>3,206</strong></td>
<td></td>
<td><strong>1,040</strong></td>
<td><strong>1,040</strong></td>
</tr>
</tbody>
</table>

\(^1\) This is the annual requirement (270 p.a.) multiplied by the plan period (20 years) minus an allowance of 1,120 dwellings apportioned to 'other settlements'. Apportionment is relative to the population of each of the settlements (i.e. Clitheroe 58%, Longridge 29% and Whalley 13%).

\(^2\) This allowance reflects anticipated development in Preston Borough at Longridge - 200 dwellings have therefore been taken from Longridge and reapportioned to 'other settlements'.
<table>
<thead>
<tr>
<th>Settlement</th>
<th>Number of houses to be provided (% of 4,280)</th>
<th>Number of dwellings already completed / permission granted for each 'settlement' / area (based on Parish)</th>
<th>Unadjusted residual (less number already completed / permission given)</th>
<th>Longridge Adjustment</th>
<th>Proposed Strategic Site - 1,040 dwellings</th>
<th>Residual number of houses required for each settlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clitheroe</td>
<td>2,482</td>
<td>282</td>
<td>2,200</td>
<td></td>
<td>1,160</td>
<td>1,160</td>
</tr>
<tr>
<td>Longridge</td>
<td>1,241</td>
<td>75</td>
<td>1,166</td>
<td>966</td>
<td></td>
<td>966</td>
</tr>
<tr>
<td>Whalley</td>
<td>556</td>
<td>132</td>
<td>424</td>
<td></td>
<td></td>
<td>424</td>
</tr>
<tr>
<td>Other Settlements</td>
<td>1,120</td>
<td>504</td>
<td>816</td>
<td></td>
<td></td>
<td>816</td>
</tr>
<tr>
<td>Standen Strategic Extension</td>
<td>1,040</td>
<td></td>
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<tr>
<td><strong>Total</strong></td>
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<td><strong>993</strong></td>
<td><strong>4,406</strong></td>
<td></td>
<td></td>
<td><strong>4,406</strong></td>
</tr>
</tbody>
</table>

1. This is the annual requirement (270 p.a.) multiplied by the plan period (20 years) minus an allowance of 1,120 dwellings apportioned to 'other settlements'. Apportionment is relative to the population of each of the settlements (i.e. Clitheroe 58%, Longridge 29% and Whalley 13%).

2. This allowance reflects anticipated development in Preston Borough at Longridge - 200 dwellings have therefore been taken from Longridge and reapportioned to 'other settlements'.
### Table 3 - Justin Gardner Consulting - Higher End of Range Scenario (310 dwellings per annum)

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Number of houses to be provided (% of 5,080)(^1)</th>
<th>Number of dwellings already completed / permission granted for each settlement / area (based on Parish)</th>
<th>Unadjusted residual (less number already completed / permission given)</th>
<th>Longridge Adjustment</th>
<th>Proposed Strategic Site - 1,040 dwellings</th>
<th>Residual number of houses required for each settlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clitheroe</td>
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<td>282</td>
<td>2,664</td>
<td></td>
<td>1,624</td>
<td>1,624</td>
</tr>
<tr>
<td>Longridge</td>
<td>1,473</td>
<td>75</td>
<td>1,398</td>
<td></td>
<td>1,198</td>
<td>1,198</td>
</tr>
<tr>
<td>Whalley</td>
<td>660</td>
<td>132</td>
<td>528</td>
<td></td>
<td>528</td>
<td>528</td>
</tr>
<tr>
<td>Other Settlements</td>
<td>1,120</td>
<td>504</td>
<td>616</td>
<td></td>
<td>816</td>
<td>816</td>
</tr>
<tr>
<td>Standen Strategic Extension</td>
<td>5,080</td>
<td>993</td>
<td>5,206</td>
<td></td>
<td>1,040</td>
<td>1,040</td>
</tr>
</tbody>
</table>

\(^1\) This is the annual requirement (310 p.a.) multiplied by the plan period (20 years) minus an allowance of 1,120 dwellings apportioned to 'other settlements'. Apportionment is relative to the population of each of the settlements (i.e. Clitheroe 58%, Longridge 29% and Whalley 13%).

\(^2\) This allowance reflects anticipated development in Preston Borough at Longridge - 200 dwellings have therefore been taken from Longridge and reapportioned to 'other settlements'.
### Table 4 - PDCs Proposed Alternative Spatial Distribution of Housing

<table>
<thead>
<tr>
<th>Settlement Areas</th>
<th>Amount of Housing Growth (2008 - 2028)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>4,200 dwellings or 210 dwellings per annum</td>
</tr>
<tr>
<td>Clitheroe</td>
<td>35-40%</td>
</tr>
<tr>
<td></td>
<td>1,40 - 1,680 dwellings</td>
</tr>
<tr>
<td>Longridge</td>
<td>20-25%</td>
</tr>
<tr>
<td></td>
<td>840 - 1,050 dwellings</td>
</tr>
<tr>
<td>Whalley</td>
<td>25-30%</td>
</tr>
<tr>
<td></td>
<td>1,050 - 1,260 dwellings</td>
</tr>
<tr>
<td>Other Settlements</td>
<td>15%</td>
</tr>
<tr>
<td></td>
<td>630 dwellings</td>
</tr>
</tbody>
</table>