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

15 June 2012

Dear Sirs

Ribble Valley Core Strategy Publication Version Consultation Draft

Further to the publication of the Core Strategy Publication Draft Version, the Co-operative Group wishes to submit the following comments, which should be read alongside the completed response form: The numbering used reflects the sequence included on the response form.

Annex A:

Question 6

The Co-operative Group considers that the Core Strategy is unsound as the proposed distribution of housing development described in paragraph 4.11 which follows the overall Development Strategy set out in Key Statement DS 1 is not justified.

The distribution of 33% of the proposed total housing requirement to settlements other than the main settlements of Clitheroe, Longridge and Whalley has not been subject to consultation at the previous stages. There is also no evidence presented in the current version to support and justify this distribution.

The National Planning Policy Framework requires local authorities to use a proportionate evidence base when preparing their local plans, which includes having a clear understanding of housing needs in their area (para 159). We would also therefore note that the Council does not appear to have an up-to-date evidence base, including a Strategic Housing Land Availability Assessment (published 2009) and Strategic Housing Market Assessment (published 2008).
The options presented during the previous stage in the Core Strategy consultation in June 2011 (Generic Development Strategy Options) utilised a distribution of housing of 10% (Option A), 20% (Option B) and an unspecified proportion to the ‘other settlements’. Options C and D, where the proportion to be distributed to the other settlements was not specified, were least popular in terms of the consultation responses. However, no indication is provided to explain why the preferred option has utilised a 33% distribution and not either the 10% or 20% distributions.

While the need to make provision for housing development outside the main settlements is not challenged, there is no evidence presented as to why a greater amount of the overall provision is not directed towards the main settlements which have a better range of services and will be more sustainable locations for housing development in most respects.

You will be aware that the Co-operative Group secured outline planning permission (through Appeal) in September 2011 for up to 80 houses at a site on land north of Riddings Lane, Whalley. The Inspectors Report highlighted that there is a clear and acute housing and affordable housing need, requiring delivery of a level of housing in excess of the existing RSS housing targets.

Whalley was accepted to be a suitable and sustainable location for housing by both the local authority and the Planning Inspector. Indeed the Council confirmed in advance of the Planning Inquiry, on 23 June 2011, that “It is our intention to limit the scope of our evidence to congestion and general amenity issues that will arise as a consequence of the increase in traffic generated by the development.”

The Co-operative’s land was assessed in the Council’s Strategic Housing Land Availability Assessment (referred to as ‘land adjacent to Clitheroe Road’) and is considered to be suitable, available and developable (i.e. a sustainable and deliverable site). There is capacity for a further circa 400 dwellings on land adjacent to the consented site at Whalley. It therefore seems incongruous that provision in a location that is recognised as being deliverable, viable and highly sustainable might be overlooked in favour of development within less sustainable locations in the smaller, more dispersed settlements within Ribble Valley.

Question 7

The Core Strategy should utilise a housing distribution strategy that directs a greater proportion of new housing towards the main settlements than is currently proposed.
Annex B:

Question 6

The Co-operative Group wishes to support the provision of housing development based on a minimum of 4,000 dwellings over the plan period 2008 – 2028.

The increase in the average provision of dwellings per annum from 160 to 200 over the plan period is welcomed as it lies within the range recommended by the "Defining a Local Housing Requirement" process. It thus offers the opportunity to support the provision of affordable housing and discourage unsustainable levels of in-commuting from neighbouring districts.

Any reduction below this level should be resisted as it already lies towards the lower end of the recommended range. A smaller requirement will not achieve the benefits described above and risks having major adverse impacts on the available labour supply in the district with the consequent effect of suppressing the economic growth potential.

We note that the Planning Inspectorate has recently written to Wigan Council advising that it should add in a buffer of 20% buffer to its housing land supply identified in its Core Strategy in order to "take account of past performance". On the basis that, since 2009, Ribble Valley Council has been unable to demonstrate a 5 year housing land supply, and it was only able to demonstrate a 2.9 year housing land supply in 2011, we would therefore strongly recommend that this provision should be increased further.

We trust these comments will be taken into account in the preparation of the Core Strategy. Please do not hesitate to contact me if you would like to discuss anything further.

Yours faithfully
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 16th 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.
Please use a separate form for each individual comment.

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

Co-operative Group

Q3
To which part of the Core Strategy does this comment relate?
Part of document eg Key statement reference, 'Vision' section etc...

Key statement DS 1

Paragraph No.

4.2 - 4.11

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

i) Legally compliant

Yes

No

ii) Sound *

Yes

No

* 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.

PLEASE SEE ATTACHED PAGE A.
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 attached Annex A.

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.

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.

Q12  Date of completion

   [13/4/2012]

Q13  Signature

   [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
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)  
CO OPERATIVE GROUP

Q3
To which part of the Core Strategy does this comment relate?
Part of document eg Key statement reference, 'Vision' section etc...  
KEY STATEMENT H’
Paragraph No.  
6.2 – 6.4

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.

PLEASE SEE ATTACHED ANNEX B.
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.

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Q12 Date of completion

[13/04/09]

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
Philip Dagnall

From: 
Sent: 15 June 2012 12:10
To: Core19
Cc: Malcolm Burns; Teresa Cook (Property)
Subject: Ribble Valley Core Strategy Publication Version - Reps on behalf of The Co-operative Group
Attachments: 20120615_Ribble Valley Core Strategy Reps_Co-operative Group.pdf; ATT3566839.txt

Sir/Madam

Please find attached a completed response form and supplementary annex, on behalf of the Co-operative Group.

I look forward to receiving acknowledgement of receipt.

Kind regards

Rebecca

The co-operative estates

Commercial and Investment Property

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15/06/2012