14th June 2012

Delivered by Email

Head of Regeneration and Housing
Chief Executive Services
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

Dear Sir / Madam

Ribble Valley Core Strategy 2008 – 2028: A Local Plan for Ribble Valley Regulation 19 Consultation Draft Representations on Behalf of [Redacted]

I am pleased to submit the following representations on behalf of [Redacted] in respect of the Core Strategy Regulation 19 Consultation Draft. They are made further to those submitted by Barratt at the Regulation 18 (formerly Regulation 25) Alternative Options stage and also in November 2011 in response to the Housing Requirement Review consultation. Completed forms for each individual representation are enclosed.

Core Strategy Vision and Strategic Objectives

The proposed Vision would benefit from minor revised wording and additional clarification within the supporting text to confirm that the objectively-assessed needs of the Borough will be fully met, in accordance with the National Planning Policy Framework, whilst preserving the special characteristics of the area for future generations. Additionally, the broad term ‘growth’ would benefit from clarified wording to confirm that this relates to all forms of growth, including housing.

Barratt broadly supports the proposed Strategic Objectives of the plan and notes that at Paragraphs 3.12 and 3.13, the weight the Council attaches to the Housing Needs Surveys and how this is reflected in the SHMA evidence base, together with future population and household projections information. This is confirmed as the means to ensure that present and future housing demand is recognised and that supply matches the demand across the borough which in turn will inform the strategic housing land supply over the plan period.
This approach is welcomed in Key Settlements such as Whalley, which is identified as needing family homes with approximately one third of respondents to the Housing Needs Survey being registered on the affordable homes waiting list. This confirms that in Whalley, “the properties which are available are very expensive and are inaccessible to those on average incomes”. This is ratified in the Strategic Housing Market Assessment, which highlights Whalley (along with West Bradford and Waddington) as, “having the greatest number of households unable to afford entry-level prices.”

This approach is, however, noticeably at odds with the proposed spatial development strategy. Key Statement DS1 and Appendix 2 state that the scale and distribution of planned housing growth has been principally based on existing population size together with assumed development constraints, rather than in response to expressly meeting existing or forecasted local housing need and demand.

Barratt supports the strategic objective at Paragraph 3.19 which asserts development should be located where opportunities to reduce the use of the car can be encouraged. Locating development in Key Service Centres, such as Whalley where there are good sustainable transport links, along with a range of shops, services, local amenities and community facilities and where there is a demonstrated need for additional housing, would be wholly supportive of this strategic objective.

Key Statement DS1: Development Strategy

Barratt raise concerns in respect of the draft spatial strategy. When reading these, we request that you also consider comments made later in these representational relation to Key Statement DMG2.

Firstly, the policy seeks to accommodate the majority of growth within the proposed strategic site at Standen and the main urban areas of the Borough. This requires clarification as the policy is unsound as presently worded. It will be impossible to accommodate the balance of housing growth (outside the strategic site) within the urban areas. This should be changed to read ‘at’ or ‘will be directed to’.

It would also be useful to understand how the Council intends to identify sufficient housing land at the main urban areas. Key Statement DMG2 indicates the SHLAA will be used to identify sites and Key Statement DS1 should explain that will be achieved by a combination of housing allocations and redrawn settlement boundaries at the Site Allocations stage, which will provide for sufficient land (including a sufficient buffer) to meet the needs, particularly accounting for a situation where allocated and assumed windfall sites do not deliver.

Secondly, in respect of the proposed distribution, Barratt has concerns over the soundness of the approach on the grounds that;

a) the original preferred options identified a range of solutions based on the distribution and delivery of growth at the three Key Settlements, which was advocated as being the most sustainable pattern of development. This was subsequently diluted by the generation of further
-options and the approach that is now proposed is a hybrid compromise that offers less sustainability and far less certainty of delivery in fully meeting the Borough’s needs;

b) the proposed allocation and over-reliance upon a, single large strategic site as the key component of the core strategy accounting for one third of the residual housing requirement (subject to agreement), has not yet been adequately demonstrated to be deliverable within the plan period; (see further comments below);

c) the proposed reliance upon the 32 rural settlements within the Borough accommodating 27% of the requirement (equating to an average of 35 dwellings per settlement), when clearly some settlements will not be able to accommodate this and others will be expected to accommodate more. Further evidence is required to demonstrate the deliverability of this aspect of the proposed distribution, and;

d) finally, the distribution across the three key settlements is weighted in favour of Clitheroe and Longridge, without sufficient evidence being produced to demonstrate why Whalley should not accommodate a larger percentage of the total and play its part in sharing the burden within the Borough.

One of the key aims of the planning system is to create sustainable communities and promote sustainable development. The NPPF is clear that development should be directed towards sustainable locations. Sustainable locations cannot be solely identified or prioritised through the level of population that exists within a particular settlement. For example, housing, employment opportunities and services should be close together to reduce the need for travel, particularly by private vehicle. In other words, development should be directed toward those settlements that are accessible and have a good range of services and employment opportunities and restricted in those settlements that do not.

Whalley is identified by the Council in the Core Strategy and its evidence base as a high ranking settlement and Key Service Centre in the borough’s Settlement Strategy; this is also reflected by the saved polices of the current District-wide Local Plan (adopted 1999).

In December 2008, the Council published a ‘Settlement Hierarchy’ for the borough. The introduction confirms that the settlement hierarchy has been produced to help make informed and rational decisions about the most appropriate and sustainable location of future development, whether it be housing, schools, employment, shops or other facilities within the many settlements of Ribble Valley’. The Settlement Hierarchy identifies Whalley as a Key Service Centre. The report highlights that Clitheroe has the best provision of services and facilities in the Borough. It goes on to highlight that Longridge and Whalley also stand out from other settlements in terms of provision of access across all the various service and facility categories.

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1 Ribble Valley Settlement Hierarchy Executive Summary Observations
Table 1 of the report assesses settlements in the Borough based on local community needs including transport, convenience, community facilities, health, education and employment. The total maximum score available is 42, which is achieved by Clitheroe. Longridge and Whalley are just behind on 38. Only one other settlement – Langho – of the other 31 settlements achieves a score in the 30’s (31), indicating that sustainable development is best met in the three Key Service Centres.

Whalley as a centre is also viable and has vitality. The Council’s Employment Land and Retail Study (published October 2008) states:

"Despite its size, Whalley performs the best of the three main towns in terms of vitality and viability. It has no vacant shops, retailer confidence is high, footfall and trade seem to have been constant over the last four years, if not increasing. Shoppers from across all parts of the Borough find the town centre easily accessible (albeit mostly by car) and rate it the best town centre in terms of being able to walk around."

(Executive Summary)

It is clear, therefore, that Whalley is recognised as a vibrant Key Service Centre and represents one of the larger settlements in the borough. Spatially, Whalley represents a highly suitable and sustainable location for future growth and development and it should play its full part, along with other Key Service Centres, in accommodating (and delivering) the Borough’s housing needs. Development in this location is consistent with the draft Strategic Objectives of the Core Strategy outlined earlier in this representation.

In addition, paragraph 4.11 sets out the distribution of housing sites. 816 dwellings are proposed for ‘Other Settlements’. The viability and thus deliverability of this scale of development across small sites is uncertain and there is no indication in the Core Strategy as to how and when these might come forward. In relation to this, it is important that Key Statement DS1 should state “directed to” rather than “concentrated within”. This is because there is no indication of the intention to amend settlement boundaries in the Core Strategy at present; however, it is clear that in settlements like Whalley, development will not be able to occur at all without these changes being made.

A more even distribution of the housing requirement spread across the Borough and the three Key Service Centres in particular, with less reliance on such a large single strategic site, is considered to be a more appropriate and sustainable approach to the delivery of housing in the Ribble Valley over the plan period. This is commensurate with the approach the Council advocated in the earlier strategic options informing the Core Strategy.

With the above in mind, it is considered the use of a strategic site and deliverability of dwellings in ‘Other Settlements’ should be reconsidered. Nor does it follow that an unnecessarily limited proportion of housing growth should be allocated to Whalley and it is considered the development strategy should be revisited.
Key Statement DMG2: Strategic Considerations

Draft Key Statement DMG2 contains contradictory wording. As highlighted earlier in these representations in relation to Key Statement DS1, the Core Strategy needs to make it clear that settlement boundaries will need to be reviewed and additional land allocated to accommodate the level of planned growth at identified settlements. As drafted, Key Statement DMG2 states development proposals in defined settlements should consolidate, expand or round-off development so that it is closely related to the main built up areas. This policy is entirely undeliverable in settlements like Whalley as the situation currently stands, by virtue of there being no sites within the settlement boundary available to deliver the draft housing requirement. It is a contradiction in terms to accommodate development within a defined settlement and yet round it off at the same time, unless the settlement boundaries are to be redrawn to enclose sufficient undeveloped land within the defined area.

The Core Strategy must provide clarity on how new development is to be accommodated at the settlements to which it is directed, and until such time the draft wording of Key Statement DMG2 is neither effective nor positively prepared and is unsound.

In light of this, Barratt consider it would be appropriate for Key Statement DMG2 to be deleted, with the necessary justified detail and strategic considerations being incorporated in to Key Statement DS1.

Strategic Site

Barratt consider the proposed identification of the strategic site at Standen is unsound, primarily because it is not justified as it does not reflect the Council’s evidence base in relation to areas of housing growth, or effective, due to the inherent inflexibility of relying on a large single strategic site to meet development need. Indeed, and as referred to in relation to Key Statement DS1, there is currently no evidence to demonstrate that the proposed strategic site is viable or deliverable. The Core Strategy clearly states that additional studies are required.

The use of a Strategic Site would not be consistent with national policy, as paragraph 14 of the NPPF is clear that there should be sufficient flexibility in plans to adapt to rapid change, which the use of a large single strategic site would not permit. The strategic site is central to the plan and a failure to deliver it, in the absence of an alternative ‘Plan B’ strategy, would clearly be fatal to the Core Strategy.

It is considered that the identification of large strategic sites is unsustainable, unnecessary and unjustified, especially since the Council’s own evidence points towards the borough having ample deliverable sites within and around its respective Key Service Centres to absorb and accommodate the Borough’s development needs throughout the Core Strategy period. Both options for strategic sites are also clearly at odds with the Council’s intention to spread development more evenly and proportionately across the borough. Furthermore, identifying large strategic sites to accommodate so much of the overall development envisaged for the borough would result in a strategy which is not flexible or responsive to changing conditions as advocated by emerging Government policy. A
strategy which is overly reliant on a small number of sites will risk housing delivery, is not sustainable and with development elsewhere being restricted as a result, the broader benefits associated with well conceived development will not be fully felt throughout the rest of the borough.

**Key Statement H1: Housing Provision**

The housing provision sets out a requirement for 200 dwellings per annum to be delivered over the plan period (4,000 dwellings in total). This is based on the NLP HEaDROOM study prepared for the Council.

Barratt Homes consider Key Statement H1 to be unsound by virtue of being unjustified and inconsistent with national policy. The consultant's recommendation was that between 190 and 220dpa is appropriate, which is based on assumptions regarding the core constraints on development delivery within the Borough; principally the AONB and greenbelt, and realistic annual build rates. Whilst this range is lower than the higher forecasts derived from employment growth scenarios, it must be questioned whether it is appropriate to discount demographic-derived forecasts and what compelling evidence is there for these to be dismissed.

Further work should therefore be carried out to test the evidence and benefits of a scenario of between 220 and 260dpa to ensure better consistency with 2008-based ONS and CLG household projections and whether or not, a more forward thinking approach could not address some of the assumed core constraints and challenges to delivering increased housing in the Borough.

Nevertheless, the selection of 200 dwellings per annum as the annual housing requirement has not been justified in the Core Strategy. For the Core Strategy to be sound, utilising the justified evidence prepared by the Council's consultants, this would point towards a minimum target of at least 220 dwellings per annum and most probably, much closer to 260dpa.

The NPPF is clear at paragraph 47 that in order to "boost significantly" the supply of housing that LPAs should use their evidence base to meet the full, objectively-assessed needs for market and affordable housing in the housing market area. Paragraph 14 and the presumption in favour of sustainable development confirm that when preparing plans, LPAs should positively seek opportunities to meet the development needs of their area. In light of the Council's own evidence, the Core Strategy cannot be viewed as being positively planned or consistent with national planning policy as it would not meet its own objectively assessed housing needs.

Finally, in revising the policy, it should also be clearly stated that the requirements are also minimum targets.

**Key Statement H2: Housing Balance**

Barratt considers that draft Key Statement Policy H2 is not justified or positively prepared and is presently unsound. If it is intended to inform the determination of planning applications it should be included within the Development Management Policies of the Core Strategy, and should be positively worded. It should recognise that flexibility will be required in determining the mix of housing within a
proposed development to ensure viability and reflect market conditions, such that it is unnecessarily prohibitive to seek to refuse development that is otherwise beneficial in terms of housing delivery. The references in the policy to affordable housing provision are unnecessary as they overlap with draft Key Statement H3 and reference to the Addressing Housing Needs statement should be deleted as this will be superseded by the Core Strategy.

**Key Statement H3: Affordable Housing**

The first paragraph of Policy H3 asserts, “Affordable housing is broadly defined...” This statement results in the policy being unsound as it is not consistent with Annex 2 of the NPPF, which clearly defines affordable housing.

**Key Statement DM13: Development Management**

Key Statement DM13 is unsound as it does not currently include the model policy wording issued by the Planning Inspectorate accounting for the local application of the 'presumption in favour of sustainable development' at Paragraph 15 of the NPPF.

In order for the policy to be made sound, the model wording below should be included:

"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:

a) 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

b) specific policies in that Framework indicate that development should be restricted."

For ease of use, a reference to the draft policies in Chapter 10 of the Core Strategy should also be made within this policy, which comprises the development management policies.
Conclusion

These representations highlight a number of fundamental issues with draft policies of the Core Strategy which lead to it being unsound. Barratt consider that significant additional evidence is required to substantiate a number of the draft policy proposals as they currently stand, particularly for the proposed housing requirement, the spatial strategy and distribution, the certainty of the delivery of the strategic site and the lack of overall flexibility in the plan.

I trust the above comments are helpful and will be taken into consideration.

Yours sincerely

[Signature]

Turley Associates
Ribble Valley Core Strategy
Regulation 19 Comments Form

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Part B - Your comment(s) (Please complete a separate Part B for each comment you wish to make.)

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### Part A

<table>
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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...
   CHAPTER 6: KEY STATEMENT H2
   KEY STATEMENT H2
   Paragraph No.

Q4 As a consequence do you consider the Core Strategy is:
   i) Legally compliant ☑
   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 ☑
   Effective ☐
   Consistent with national policy ☐
   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 support your comments. Please continue on a separate sheet if required.

SEE ACCOMPANYING LETTER
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.

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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 ☑
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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.

N/A

Q12 Date of completion

140612

Q13 Signature

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Part A

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Paragraph No.

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   Yes [✓]  No

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   [ ]

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   [ ]

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   Paragraph No.
   KEY STATEMENT DSI
   CHAPTER 4

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DETAILED EXAMINATION WILL BE REQUIRED WHICH NECESSITATES PARTICIPATION.

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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.
    CHAPTER 6: KEY STATEMENT H1
    KEY STATEMENT H1

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 √
    Effective √
    Consistent with national policy √
    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 LETTER
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.

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

- Yes, I do wish to participate at the oral examination [✓]
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SEE ACCOMPANYING LETTER

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.

N/A

Q12 Date of completion

140612

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
Ribble Valley Core Strategy Regulation 19 Comments Form

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

<table>
<thead>
<tr>
<th>Part A</th>
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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.

<table>
<thead>
<tr>
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<tr>
<th>Name of Organisation (If you are responding on behalf of an organisation)</th>
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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...
KEY STATEMENT DMG2
Paragraph No.
KEY STATEMENT DMG2

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

i) Legally compliant
   Yes
   No

   ☑
   ☐

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

   ii) Sound *

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.

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    Part of document eg Key statement reference, 'Vision' section etc...

    | CHAPTER 9: STRATEGIC SITE |
    |---------------------------|

    Paragraph No.

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