Philip Dagnall

From: [redacted]
Sent: 15 June 2012 10:59
To: Core[redacted]
Subject: Comments on Core Strategy consultation
Attachments: CPRE comments on EN2.doc; CPRE comments on Vision and overall strategy.doc; CPRE comments on Development Strategy & H1.doc

Dear Sir / Madam,

Please find attached comments from CPRE Lancashire branch on your core strategy consultation. We have reflected the format of the response forms in our comments, which cover 3 areas:-

1. Vision and overall strategy
2. Development strategy & housing
3. Landscape and farmland

Please acknowledge receipt and keep us informed of all future stages in the process.

Regards,

Campaign to Protect Rural England
Standing up for your countryside

CPRE National Office | 5-11 Lavington Street, London, SE1 0NZ | Tel: 020 7981 2800 | Fax: 020

This email is confidential and may also be legally privileged. If you have received this email in error, please immediately by reply and delete it from your system. Views expressed in this email are those of the sender and do not reflect the views of the Campaign to Protect Rural England (CPRE). This email and any attachments have been scanned with Sophos Anti-Virus. CPRE is registered as a charity (No. 1089685) and company (No. 4302973) in England. Southwark Street, London SE1 0SW Website: www.cpre.org.uk

15/06/2012
CPRE comments on Key Statement EN2

Part A

Q1
Name - Andy Yuille
Name of organisation - Campaign to Protect Rural England Lancashire Branch
Database Reference number - N/A
Address - Office 2, Springfield House, 41-45 Chapel Brow, Leyland, Lancs.
Post Code - PR25 3NH
Email address - andyy@cpre.org.uk; info@cprelancashire.org.uk
Phone number - 01772-378831; 01524 389 915

Part B

Q2 Name of Organisation: Campaign to Protect Rural England Lancashire Branch

Q3 To which part of the Core Strategy does this comment relate?
Key Statement EN2

Q4 As a consequence we consider the Core Strategy is: unsound

Q5 If you consider the Core Strategy is unsound, is this because it is not...justified, effective or consistent with national policy

Q6 Reasons why the core strategy is not sound

We would first wish to re-iterate our very strong support for the intention of this policy and the context in which it sets the rest of the strategy. However, to be consistent both with its own supporting text, and with the NPPF, some amendments will be required.

The supporting text states that

“...outside these statutory areas the borough comprises extensive areas of open countryside much of which has an intrinsic value that contributes to the quality of the landscape in the borough. In addition the founding principle of landscape character is that all landscapes have a value. The Council considers that it is important to ensure development proposals do not serve to undermine the inherent quality of the landscape.”

The NPPF states that plans must:

“take account of the different roles and character of different areas...recognising the intrinsic character and beauty of the countryside”

However, policy EN2 only requires protection, conservation or enhancement of those areas within, or that contribute to the character and setting of, the AONB. While this focus is understandable given that the AONB covers 75% of
the Borough’s area, to be internally consistent and to comply with the core planning principle of the NPPF, the policy will need to provide a degree of recognition and protection for all open countryside. The supporting text should also emphasise that this protection is necessary both for the intrinsic value of the character and beauty of the countryside, and as the Borough’s key economic and social asset.

A notable absence from the core strategy is any reference to protection for farmland, particularly given that this is such a rural area. Protecting farmland from development that could be better located elsewhere will become an increasingly important role for the planning system as issues of food security, food miles and the need to increase production while also improving environmental outcomes continue to rise up the political and economic agendas. This policy would be better justified, make the strategy more effective, and comply better with national policy (in particular NPPF paragraph 112 which requires some account to be taken of the economic and other benefits of the best and most versatile agricultural land, and for land of lesser agricultural value to be used where developing farmland is unavoidable) if the policy protected better agricultural land, and indeed all agricultural land where possible, and the supporting text explained the importance of agriculture both locally (in economic, environmental, social and cultural terms) and nationally. This should be seen as complementary to support elsewhere in the core strategy for farm diversification schemes.

While this policy makes a strong statement of principle in terms of development being in keeping with the character of the landscape, the NPPF goes further in stating the consequences for applications if they do not contribute to the character of an area, in paragraph 64:

"Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions."

Given the very sensitive and special nature of the Borough’s landscapes and character, this policy should be strengthened to reflect national policy.

Work done by communities at a very local level can contribute significantly to an understanding of local landscape and settlement character. Highlighting such work will both add to the policy intention to maintain and enhance the area’s character, and to empower local people in line with the NPPF’s first core planning principle.

Q7 Necessary changes:-

Policy to be amended to read:-

"KEY STATEMENT EN2: LANDSCAPE

The landscape and character of the Forest of Bowland Area of Outstanding Natural Beauty will be protected, conserved and enhanced. Any
development will need to contribute to the conservation of the natural beauty of the area.

The landscape and character of the open countryside outside the AONB will be protected from inappropriate development, conserved and wherever possible enhanced.

Development of farmland will be avoided where practicable. Development that would result in a reduction in the agricultural quality, or loss, of Grade 1, 2 or 3a agricultural land will only be permitted where it can be demonstrated that it could not be located on lower grade land.

As a principle the Council will expect development to be in keeping with the character of the landscape, reflecting local distinctiveness, vernacular style, scale, style, features and building materials. Proposals which do not take available opportunities to maintain or improve the character and quality of the area will be refused.

Where available, Village Design Statements will be taken into account in determining applications.”

Supporting text to
– explicitly state that protection of the countryside is necessary both for the intrinsic value of its character and beauty, and as the Borough’s key economic and social asset
– explain the importance of agriculture both locally (in economic, environmental, social and cultural terms) and nationally

Q 8 We would like to participate in the oral examination.

Q9 We would like to participate in the oral examination because CPRE are recognised community experts in landscape issues in planning. We have suggested some significant changes which we believe are necessary to ensure soundness and the Inspector would benefit from an opportunity to test the merits of arguments on both sides of the debate.

Q 10 We would like to be informed of all future stages of the Core Strategy’s progress

Q 11 No further comments

Q 12 Date of completion: 07/06/2012

Q13 Signature
CPRE comments on the Vision and strategy as a whole as means of achieving that Vision, particularly in relation to the NPPF.

Part A

Q1

Name

Name of organisation - Campaign to Protect Rural England Lancashire Branch
Database Reference number - N/A
Address - Office 2, Springfield House, 41-45 Chapel Brow, Leyland, Lancs.
Post Code - PR25 3NH
Email address - andyy@cpre.org.uk; info@cprelancashire.org.uk
Phone number - 01772-378831; 01524 389 915

Part B

Q2 Name of Organisation: Campaign to Protect Rural England Lancashire Branch

Q3 To which part of the Core Strategy does this comment relate?
Vision and strategy as a whole as means of achieving that Vision, particularly in relation to the NPPF.

Q4 As a consequence we consider the Core Strategy is: unsound

Q5 If you consider the Core Strategy is unsound, is this because it is not...Justified, effective or consistent with national policy

Q6 Reasons why the core strategy is not sound

The Vision is the right one for the area, taking into account the expressed views of the community (both through the Sustainable Community Strategy and consultation on this strategy) and the evidence base, in particular the key role that the high quality of the environment and the special rural characteristics of the area play in ensuring the Borough’s future prosperity and wellbeing.

The broad principles and overall thrust of the strategy would be effective, justified and comply with national policy, subject to our limited comments below and in more detailed submissions on particular policies. We would like to express particularly strong support for the strong focus on maintaining and enhancing landscape character and the special characteristics of the area. We also consider that those policies we do not comment on are sound, and while there is scope for minor improvements we would o the whole support them.

However, the scale of housing growth proposed is not effective, justified or compliant with national policy. The proposed increase in housing numbers to 4,000 over the plan period threatens to undermine the Vision and
conformity with the NPPF. We address this issue in detail in a separate comment on the development Strategy and Key Statement H1.

CPRE maintains that if the housing requirement were reduced to 3,200, the Vision would be deliverable and the strategy overall would be in conformity with the NPPF when taken as a whole. We illustrate this by briefly assessing the strategy, incorporating the assumption that the housing requirement is reduced as we recommend, against each of the NPPF’s core planning principles in turn:-

- The overall thrust of the strategy takes account of the available evidence and of the views of local communities, thereby empowering local people and setting out a practical and positive vision for the area. It is succinct, uses plain English and is easy to access. However, the higher housing numbers proposed are clearly due to a fear of external pressure from developers or central Government, and conflicts with the wishes of the community, the Vision and the central theme of the strategy, which is that the landscape and special characteristics of the environment and settlements are the Borough’s key economic asset and central to its residents quality of life;

- It has attempted a creative solution to the problems of accommodating new development in a highly rural, environmentally sensitive setting by proposing a strategic extension to Clitheroe alongside limited additions to other settlements, which would, at the scale of housebuilding we recommend, enable the special characteristics of the area to be maintained;

- It will proactively drive and support sustainable economic development, by delivering sufficient employment land and business opportunities to boost the local economy and reduce out-commuting, and sufficient housing to meet the needs and changing demographics of the local population, and retain a higher proportion of younger people in the area. The key to the economic success of the area, both in terms of the visitor economy and of attracting high-value individuals and businesses, are its high quality environment and special rural characteristics. Protecting these from excessive and inappropriate development is therefore key to sustainable economic growth;

- It contains very strong policies on design, which appropriately reflect the strong stance the NPPF takes on this and which will contribute to maintaining the area’s characteristics;

- It takes account of the different role and character of different areas, clearly indicating where and of what scale development would be appropriate in order to maintain and enhance those roles and characters. The main settlements are promoted and Clitheroe as the main urban area significantly strengthened. The Green Belt is protected and the beauty and character of the countryside is recognised and protected, while still ensuring thriving rural communities through promoting an appropriate scale of development. However, policy EN2 should, as acknowledged in the supporting text, also make explicit reference to the
undesignated countryside, its value and the need to protect it for its intrinsic value. This should not just apply to those parts that contribute to the setting of the AONB. This section is not sound because the policy does not adequately reflect the justification;

- Renewables are supported to an appropriate extent given the nature of the area and development will be concentrated around the main settlements;

- Conserving and enhancing the natural environment and reducing pollution could be improved by explicitly stating that land of lesser environmental value will be preferred in future land allocations DPDs, and that applicants will be required to demonstrate that land of lesser environmental value was not available, particularly when putting forwards major proposals;

- There is not a sufficient emphasis on encouraging the effective use of land by reusing brownfield land. While there is a priority for using brownfield land for employment, there is no concomitant priority for housing development and this must be addressed in order for the strategy to be sound;

- Mixed use developments are promoted. More emphasis could be placed on the multiple benefits of open land and the need to protect these benefits, particularly around the main settlements and strategic site;

- It makes an appropriate contribution to conserving heritage assets through policy EN5;

- Patterns of growth would be managed to make the fullest possible use of public transport, walking and cycling by concentrating growth around the main settlements and the strategic site; and

- It safeguards social, community and cultural facilities and looks to enhance them in order to meet local needs.

In addition, the firm focus of the strategy (with our proposed amendments) on increasing prosperity and quality of life in the Borough, while both protecting and maximising the economic and social contribution of its outstanding environment, demonstrates compliance with the need to achieve sustainable development that is at the very heart of the NPPF, in particular paragraph 8, which we submit is the most central to understanding the NPPF as a whole, and which states:

“to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions”

The housing requirement proposed by the council threatens to undermine this central principle by causing environmental, social and economic damage and by putting short-term housing growth over long-term prosperity, by imposing a scale of development that will damage the character of the area, put excessive strain on infrastructure, harm the intrinsic value of the countryside and thereby begin to compromise the
area’s central economic asset and the key to its future prosperity and quality of life.

We recommend that in order to establish the presumption in favour of sustainable development at the heart of the strategy, an additional policy “Key Statement SD1: Sustainable development in Ribble Valley” is added. We suggest specific wording below.

**Q7 Necessary changes:**

- Reduce housing requirement to 3,200 over plan period (see comment on the Development Strategy (section 4) and Key Statement H1)
- Prioritise brownfield redevelopment for housing (see comment on the Development Strategy (section 4) and Key Statement H1)
- Reduce the scale of development on the strategic site over the plan period (see comment on the Development Strategy (section 4) and Key Statement H1)
- Clarify protection for undesignated countryside (see comment on EN2)

Introduce a policy on sustainable development. We suggest the following wording:

“**Key Statement SD1: Sustainable development in Ribble Valley**

Ribble Valley is planning positively for sustainable development that will enhance the prosperity and quality of life of all of its residents. Development that complies with the policies in this Strategy will be considered sustainable. However, proposals that depart significantly from any of the policies in this strategy will not be considered sustainable. The council will work proactively with applicants and the community jointly to find solutions which mean that proposals can be approved, by being made sustainable, wherever possible.

Development that delivers economic, social and environmental objectives jointly and simultaneously in an integrated way will be welcomed in Ribble Valley. Development proposals will be expected to demonstrate how they enable all these objectives to be achieved, rather than delivering some at the expense of others.

Where conflicts between social, economic and environmental objectives do arise, development proposals should demonstrate:

1. How they have attempted to avoid such conflicts
2. How they have minimised any unavoidable adverse impacts
3. How they will compensate for any residual negative impacts
4. How the benefits of the development outweigh any residual negative impacts

After following these steps, development that would still have an unacceptable impact on economic, social or environmental assets will not be permitted. Economic, social and environmental objectives will overall be given equal weight.”
Q 8 We would like to participate in the oral examination

Q 9 We would like to participate in the oral examination because the Inspector would benefit from a reasoned and justified defence of the intentions behind the core strategy combined with a critical analysis of the scale of development proposed. We have no doubt that s/he will be presented with alternative views about the compliance of the draft strategy with national policy, and its effectiveness and degree of justification, and this would present an opportunity for him/her to test the merits of arguments on both sides of the debate in a way that is not possible without either us or other interested parties being aware of the case the other is making at this stage of the proceedings.

Q 10 We would like to be informed of all future stages of the Core Strategy’s progress

Q 11 No further comments

Q 12 Date of completion: 07/06/2012

Q 13 Signature
CPRE comments on The Development Strategy (section 4) and Key Statement H1

Part A

Q1
Name
Name of organisation - Campaign to Protect Rural England Lancashire Branch
Database Reference number - N/A
Address - Office 2, Springfield House, 41-45 Chapel Brow, Leyland, Lancs.
Post Code - PR25 3NH
Email address - andyy@cpre.org.uk; info@cprelancashire.org.uk
Phone number - 01772-378831; 01524 389 915

Part B

Q2 Name of Organisation: Campaign to Protect Rural England Lancashire Branch

Q3 To which part of the Core Strategy does this comment relate?
The Development Strategy (section 4) and Key Statement H1

Q4 As a consequence we consider the Core Strategy is: unsound

Q5 If you consider the Core Strategy is unsound, is this because it is not...Justified, effective or consistent with national policy

Q6 Reasons why the core strategy is not sound

The draft strategy increases the annual average housing requirement from 161 pa to 200 pa. This would result in a jump from 3,200 new units being delivered over the plan period to 4,000. 161 new dwellings pa is already a very substantial scale of development for a highly rural area with a very sensitive and high quality environment. The existing targets are therefore already making a very considerable contribution to the Government’s growth agenda and intention to boost housing supply.

It is vital to understand, as the draft strategy makes abundantly clear, that the particular rural characteristics of the area and its settlements, and the high landscape quality of the designated and undesignated countryside in which they sit, are central not just to the quality of life of current and future residents, but also to the Borough’s future economic growth. This growth relates both to the visitor economy and agricultural and land management industries, and to the wider economic benefits of providing an extremely attractive environment for high-value individuals and businesses to live, work and invest.

Housing growth on the scale proposed by the council is likely to undermine those key economic, social and environmental assets and compromise their value. It would therefore be contrary to national policy to promote growth
as well as to conserve environmental quality as set out in the NPPF. It would not represent the achievement of sustainable development, ie economic, social and environmental gains being achieved jointly and simultaneously. It cannot be the most appropriate strategy when there is a reasonable alternative of retaining the existing housing targets, which were themselves considered to be at the upper end of tolerance for the area’s environmental capacity when they were established.

We recognise that there are significant housing issues in the area, in particular in relation to affordable housing, housing for agricultural workers, and housing for a changing demographic. We believe that these issues can be addressed in a way that does not harm the environmental resource of special characteristics of the area.

We address below the key issues on which we maintain the current strategy is unsound, including the key reasons why housing provision should be maintained at 161 pa over the plan period, the need for policy prioritising brownfield development, and plans for the strategic site:

a) The Nathaniel Lichfield report relied upon by the council draws three key conclusions as to why a level of house building in the range of 190-220 dwellings pa is appropriate:-

“...it is in NLP’s view that any figure significantly lower than this 190 - 220 range 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 in commuting from neighbouring districts. The 190 - 220 DPA range also reflects the potential for increasing the delivery of housing in Ribble Valley following the relaxation of the Housing Policy restraint.”

- Affordable housing: we recognise that a lack of affordable housing is a key issue for the Borough. One justification for the increase in housing numbers to 200 pa is that a lower figure will not deliver sufficient affordable housing. However, at an average rate of 25% of housing delivered being affordable, this only equals an extra ten homes pa. 25% is a generous estimate given that a) it will be easier for smaller scale developments that may fall under the threshold for contributing to affordable housing to meet the council’s policies on fitting in with their surroundings, and b) despite the council’s clear and firm policy of only reducing provision of affordable housing to 20% in very limited circumstances, evidence from around the country suggests that successful negotiation of lower or no levels of affordable housing provision is increasingly frequent. Other means of securing an additional ten affordable homes per year could be pursued, that would not have such a damaging impact on the special qualities of the Borough and therefore on its key asset, and which would not conflict with the Strategy’s Vision and strategic objectives, eg reducing the thresholds at which contributions towards affordable
housing will be required (eg to five units in Longridge and Clitheroe, and three elsewhere), and/or increasing the level of provision sought, eg to 35%.

- Economic growth: the core strategy makes clear throughout that its economic growth objectives are reliant on its key asset, which is the Borough’s special characteristics and high environmental quality. Significantly increasing the amount of housing development above 160 dwellings pa is likely to start to compromise those qualities and therefore to have a negative impact on growth objectives. In terms of promoting sustainable patterns of growth and reducing commuting, the need is to prevent out-commuting from the Borough rather than vice-versa, and therefore to contribute to wider sustainable development the focus should be on delivering appropriate levels and qualities of employment land and opportunities, not an excess of homes for people that will then have to commute out of the Borough.

- Relaxation of restraint: the Nathaniel Lichfield report is based largely on pre-recession assumptions about rates of growth in the economy and in housing demand. Since the relaxation of the restraint policy completions have remained below 100 pa and have recently resumed a downward trajectory. It is noteworthy that there were just 375 net completions in the five-year period 2006-2011. The construction and housebuilding sectors have been particularly hard hit by the recession and forecasts tend to suggest that there will not be a recovery to anywhere near pre-recession growth rates until well into the plan period. A lower target is therefore more realistic, takes better account of the evidence, and would enable better planning in that it would not force less sustainable sites to be released / approved in order to meet unrealistic targets. The council’s job is to allocate land and give permission for building the right homes in the right places. It cannot force homes to be built, and increasing its targets will not force homes to be built. What increased targets will do is force the council to approve inappropriate applications in unsustainable locations, undermining the ability of the planning system to guide land use in the public interest.

b) A higher target in RVBC is likely to have the unintended effect of undermining regeneration and the delivery of housing in adjacent local authority areas where there is greater capacity to absorb that growth, and where it would deliver greater public benefit for less environmental harm. The travel-to-work areas of Ribble Valley settlements overlap considerably with nearby urban areas. There will therefore be direct competition between these areas for new housing development. Particularly while the market is weak and both consumer and industry confidence and access to finance is extremely limited, the strategically appropriate response is to prioritise housebuilding in urban areas with significant brownfield resources, and with higher concentrations of population, (sustainable) infrastructure and economic activity, in order to make best use of that existing infrastructure and manage patterns of growth in the most sustainable way.
Allowing scarce resources to be diverted away from areas in need of regeneration to environmentally-sensitive rural locations does not represent social, economic or environmental gains.

c) A review of housing numbers is planned for five years’ time and this is appropriate. This would fit in with expected timescales for recovery of the housebuilding sector to levels somewhat closer to pre-recession growth - however such projections must be taken with considerable caution given the ongoing economic instability in this country and beyond, particularly in the Eurozone. The precautionary principle would indicate that the most sustainable and practical approach would be to adopt a lower target for the first five years, with a review in five years’ time to see if higher numbers could be delivered, and in a way that reduces potential environmental, social and economic harms to an acceptable level. It is not sound planning to set a target that cannot be reached early in the plan period, when a review is already scheduled, that would leave the Borough perpetually playing ‘catch-up’ with a self-imposed deficit.

d) Whatever level it is set at, the housing target should be seen as a target and not a minimum, in order to enable effective protection and management of the environmental resource. It should be exceedable under certain circumstances, where it can be demonstrated that it is sustainable to do so. We set out in the next section some criteria that should apply.

e) There is flexibility for additional housing, on top of the target set in the Local Plan, to come forward through neighbourhood planning, rural exception sites, and the criteria we outline below. If the locations are capable of absorbing such development and the communities want it, it can be delivered. If neither of these are the case, the council should not impose higher levels of housebuilding against the community’s will. The Strategy rightly acknowledges that the wishes of the community expressed through consultation and the evidence base must be the two key drivers behind the strategy. The evidence for the need for significantly higher housebuilding rates than those set out in the Regional Strategy is not strong enough to override the clear wishes of the community. Those targets, if achieved, would contribute significantly to the Government’s economic and housing growth agendas, and would be appropriate to the role and character of the Borough’s settlements, with any community-approved, local-needs led or regeneration-driven additions as a bonus.

f) Alongside protecting the environmental resource, the Strategy has a strong focus on ensuring and enhancing the vitality and viability of the Borough’s settlement’s, as well as maintaining and enhancing their special characteristics. However, the numbers of new dwellings are allocated to the settlements on the basis of existing populations. There is no analysis of how many new homes may be necessary to maintain or enhance their vitality, set against the damage to their character that significant new development is likely to cause. There is therefore no evidence-based case that increased vitality and viability could be delivered through 200 units p.a but not 160. 160 additional dwellings p.a is a very substantial level of growth for such a
rural area and is more than adequate to enhance the vitality of its market
towns and other settlements. The additional traffic, transport and
congestion problems caused by significant new housing development,
especially in Whalley and Longridge, would be likely to undermine rather
than enhance vitality.

g) The strategy does not currently contain a brownfield target or a priority for
using brownfield land first for new housing. The NPPF makes it clear that
local authorities should encourage the redevelopment of brownfield land.
This is most effectively done through a policy which requires a sequential
approach to development, with brownfield land to be developed before
greenfield. There is a welcome priority for employment development to be
focused on brownfield land and the same should apply to housing. The
Regional Strategy, which is still a part of the statutory development plan,
sets the brownfield target for the Borough at 65%, although we accept that
this was a joint target with two other authorities which had considerably
higher brownfield availability. Even once Regional Strategies are abolished,
the NPPF makes clear (para 218) that the evidence on which Regional
Strategies were based, and the policies that flowed from that evidence can
be used to inform Local Plans. The Annual Monitoring Report shows that
from 1 April - 31 September 2011 96% of new dwellings were on brownfield
land, demonstrating that there is substantial capacity and ability to drive
brownfield regeneration in the Borough. A locally-determined brownfield
target should therefore be set as the most effective way of driving
development to those areas where it will have most positive and least
negative impacts on achieving the Vision. The AMR does not reveal the
proportion of housing delivered on windfall sites, and in line with NPPF
paragraph 48, historic delivery on windfall sites should be considered and an
allowance made if relevant.

h) We note that monitoring indicator / target 3.1 is to “Increase the number of
empty homes brought back into use”. However, the housing policies do not
address this issue. For internal consistency (which must be essential for
effectiveness), it must be necessary to drive the re-use of empty homes
through policy. Failure to address such a significant issue, especially where
the prospect of excessive new building threatens to undermine the special
characteristics of the area, must be a question of soundness. In July/August
Cllr. Ken Hinds carried out a survey on behalf of Nigel Evans MP which found
that there were 1572 properties either for sale, rent or empty in Ribble
Valley. Since then the number for sale has increased substantially.

i) Given the small scale of the settlements involved and the need to maintain
and enhance the vitality of their centres, there could usefully be a policy
encouraging the use or conversion of space above shops and other
commercial premises as flats.

j) We reluctantly accept that the most sustainable way of delivering the
development needed in the Borough is through a strategically planned
extension to Clitheroe. The alternative appears to be intense pressure for
ad hoc and haphazard development around all the major and minor
settlements, which will cumulatively have much larger negative impacts on landscape character, the character and functioning of the settlements, viable farmland, pressures on infrastructure, and the countryside as a whole. However, the current plans for the strategic site would increase Clitheroe's population by nearly 15%, which is a very substantial increase for what is a small settlement, despite being the Borough’s main urban area. Such a scale of increase cannot be argued to be necessary to maintain the vitality or viability of the town, or to meet local economic or housing needs. We recommend that, if our recommendations on maintaining the housing requirement at the existing level of 161 pa is accepted, the scale of the site is significantly reduced to delivering 400 houses within the plan period. However, the rest of the site should be allocated as safeguarded land for development beyond the plan period. This would help to protect the special characteristics of the Borough and its settlements throughout and beyond the plan period by relieving pressure on the infrastructure and character of other settlements, provide certainty for developers and manage the expectations of local communities. It would enable proper infrastructure provision to be put in place before houses start being built; proper control of the appearance of the site, including landscaping, planting, provision of open space etc to reduce visual impact, and for the local community to be involved in the detailed proposals that could be brought forward through an Area Action Plan or similar.

Q7 Necessary changes:-

1. Retain the existing housing requirement of 161 units pa, equivalent to 3,200 over the plan period

2. Reduce the scale of development on the strategic site over the plan period to 400 houses

3. Establish a new distribution of housing across the main settlements and rest of the Borough to reflect these changes, thereby easing pressure on the infrastructure and character of other settlements

4. Safeguard the remainder of the land covered by the existing strategic site for development beyond the plan period, in order to protect the special characteristics of the area and its settlements beyond the plan period, provide certainty for developers and manage the expectations of local communities

5. Prioritise brownfield redevelopment for housing and establish a locally-determined brownfield target

6. Introduce policy on empty homes, for example “The Council will adopt a systematic approach based on recognised best practice to reduce the number of long term empty homes in the Borough. We will work with empty homeowners, to support and encourage voluntary action, but committing to take appropriate enforcement action where reasonable negotiations fail. Emphasis will be placed on developing appropriate,
low cost solutions which are both effective in bringing empty homes back into use and help meet our broader strategic objectives. Proposals which bring empty homes back into use will be supported in principle.” We accept that some or all of this policy may be more appropriate as a separate policy / Key Statement.

7. Amend the thresholds and proportions of affordable housing required as indicated in the previous section

8. Express the housing target as a target, not a minimum. Establish circumstances under which this target may be exceeded. Criteria to determine this should include that infrastructure, including fresh and foul water systems and transport, are adequate or can be provided / managed to ensure an adequate standard at the prospective developers’ expense, AND where one of the following also applies:
   - There would be substantial regeneration benefits from the redevelopment of a vacant and / or derelict windfall site can be demonstrated, and the site’s reuse for solely commercial use is not economically viable;
   - Suitable small scale opportunity schemes in the main settlements that make a positive contribution to the area’s character;
   - It would entail the reuse or conversion of a listed building or a building within a conservation area that contributes to the character of that area and it is demonstrated that no other use would secure the future of that building;
   - The provision of schemes of 100% affordable housing;
   - The provision of agricultural or forestry workers dwellings.

Q 8 We would like to participate in the oral examination

Q 9 We would like to participate in the oral examination because the Inspector would benefit from a reasoned and justified defence of the intentions behind the core strategy combined with a critical analysis of the scale of development proposed. We have no doubt that s/he will be presented with alternative views about the compliance of the draft strategy with national policy, and its effectiveness and degree of justification, and this would present an opportunity for him/her to test the merits of arguments on both sides of the debate in a way that is not possible without either us or other interested parties being aware of the case the other is making at this stage of the proceedings.

Q 10 We would like to be informed of all future stages of the Core Strategy’s progress

Q 11 No further comments

Q 12 Date of completion: 07/06/2012
Q13 Signature