Ribble Valley
Local Development Framework

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

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.
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 TOTAL comments May 2012 (Doc 1)
Particular note proposed allocation north of Dilworth Lane, Longridge. (See RNDC advice letter 2.11.12 and Core Strategy Reg 2.5 response 9/10/1108)

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 ☐
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 *
   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.

See representations submitted on behalf of Janet Orion Town Planners Ltd, May 2012 (attached)
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

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 Borough Council; Core Strategy
Regulation 19 Comments
Representations Submitted by

This submission should be read in conjunction with the completed Part A and Part B forms.

Paragraph 4.11
The proposed strategic pattern of housing distribution is detailed in the table. We are supportive of the proposed distribution. However, given that the only proposed allocation is at Standen and that settlement boundaries are drawn tight to the built up areas of all settlements, we are concerned about deliverability. The Core Strategy (CS) should provide an immediate and clear steer as to how decisions on planning applications would be made, ie give greater certainty to developers. The lack of such a ‘clear steer’ is evident from some of our further submissions.

Paragraph 6.2 / Strategic Spatial Policy H1: Housing Provision
We note the reference in the last paragraph of the policy to a formal review of the housing requirement within five years. We object to such ‘short-termism’. We consider that the Cs should plan for the long-term. Indeed, NPPF paragraph 157 expects Local Plans ‘to be drawn up over an appropriate time scale, preferably a 15-year time horizon’. To build in an early review is unjustified, inappropriate, not in accord with national policy and would cerate uncertainty for communities, developers, those deciding planning applications and those involved in the phasing and delivery of necessary infrastructure.

Paragraph 6.5 / Strategic Spatial Policy H3: Affordable Housing
Paragraph 10.18 / Development Management Policy DMH1: Affordable Housing Criteria
The policies expect housing for the elderly to be provided as part of all housing developments. Such provision is not justified, nor is it practicable in all cases. The reasons for provision being impracticable will vary, but include site characteristics and site context. More particularly, such provision is impractical within small developments. The Council has previously acknowledged this to be the case. For
instance, within the 'Addressing Housing Needs in Ribble Valley' policy document (only adopted by the Council in January 2012) expected (paragraph 5.1) that delivery of elderly persons' housing within developments of 30 units or more. We consider that to be an appropriate threshold and should be included within the above policies.

Development Management Policies - General
We note the inclusion of a wide range of Development Management policies, intended (along with the Strategic Spatial Policies) to replace all of the saved Local Plan policies. We acknowledge the need for a range of such policies. However, all such policies should be positively prepared, justified, effective and consistent with national policy (NPPF paragraph 182 refers).

The Development Management polices are simply listed within the CS. No justification for the polices is provided, nor is it demonstrated how the polices would be effective in implementation or consistent with national policy. In addition, many of the Development Management policies are expressed in the negative and do not reflect the NPPF expectation of 'positive preparation' and the in principle support for sustainable development. There is also considerable imprecision in the drafting of the polices, eg to consider various ill-defined factors where possible. This level of imprecision fails to provide clear guidance to communities, developers and those deciding planning applications.

Finally, the inter-relationship of the policies with the Proposals Map is entirely unclear (see later references in this regard).

We consider there to be a need to wholly overhaul the drafting of this section of the CS to address the above issues.

Paragraph 10.20 / Development Management Policy DMH3: Dwellings in the Open Countryside
The final paragraph categorically states that all applications for removal of holiday let conditions will be refused. Such a negative stance is entirely inappropriate, is not justified and does not accord with the NPPF. Rather, the policy should set out clear criteria against which such planning applications would be considered. This
would allow an appropriate assessment of the relative benefits / dis-benefits of the proposal to take place.

Paragraph 10.21 / Development Management Policy DMH4: The Conversion of Barns and Other Buildings to Dwellings
We note that the policy presumes against the conversion of buildings deemed to be isolated in the landscape. We submit that such an approach is not justified or reasonable. We also note that no such presumption applies in relation to policy DMB2 relating to the conversion of buildings to employment uses. There is, thus, an inconsistent and unjustified differential in the approach to conversions based on the end use. We consider that policy on the conversion of buildings to dwellings should be based on criteria that relate to discernible impacts. It may be that conversion of some buildings isolated in the landscape may unacceptable because of landscape impacts. However, that need not be the case in all instances and a judgement should be made on the merits of each case.

It should also be noted that as drafted the policy refers to the conversion of all buildings to dwellings, wherever located (eg within settlements). We would suggest that was not the intention and should be clarified.

Resultant Changes to the Proposals Map
The intentions for the Proposals Map (PM) are entirely unclear and ambiguous

In the first instance, it should be noted that all saved polices of the adopted Local Plan will be replaced by policies of the CS. That is, the Local Plan as it stands will cease to exist apart from the PM. Accordingly, none of the designations on the PM would have corresponding Local Plan policies. The Council detail a few policy designations on the PM that would not be replaced (Table 1) and a few policy designations relating to polices not saved (Table 2). Apart from the allocation of the Standen strategic site, no other changes appear to be proposed to the PM designations.

The Council go on to indicate that there would be changes to keys and policy references on the PM. However, these are not specified. We consider that any
changes must be detailed; otherwise, it is not possible for interested parties to understand what is intended nor to make any informed comment / representation.

The Council also indicate that some changes may be undertaken at a later stage through a DPD. This only adds to the uncertainty and ambiguity.

We note that some policies specifically refer to settlement boundaries and designations such as ‘Open Countryside’ (eg polices H3, DMG2, DMH3, DMH4, and DMB2). In such instances, the decision on any planning application would depend upon its designation on the PM. With regards to the delivery of housing, the Council has previously acknowledged that extensive areas of greenfield land outside of settlement areas would have to be developed to accommodate housing needs. The only change to the PM settlement boundaries is at Standen. Accordingly, and on the basis of the settlement boundaries as drawn (and presumed to remain for the time being), there would be a general presumption against housing development on the outer edge of the main settlements Clitheroe (excepting Standen), Longridge and Whalley and all other settlements to which that table at paragraph 4.11 correctly distributes substantial housing numbers.

Such an arrangement is at best confusing and uncertain and at worst would form a severe impediment to much needed development being delivered with consequent inconsistent decision-making.
Dear Mr S. Taylor,

RE — Enquiry regarding principle of proposed new residential development site with access off Dilworth Lane, Longridge.

I write in response to the above Pre-Application Enquiry received on the 18 November 2010, and I apologise for the delay in responding. However, following our meeting on the 21 December 2010 and the receipt of formal responses from my colleagues, I can now provide you with the following advice.

**PRINCIPLE OF DEVELOPMENT**
Under the adopted Districtwide Local Plan (DWLP), the site is adjacent to the settlement boundary within Open Countryside (Policy ENV3 and Policy G5). The information provided with the pre-application advice sets out the potential for the development site to be either 2.5ha, 1.7ha or 0.5ha, however none of these options give an indication of the number of potential units or detail of the scheme.

If plans for the larger site area were to be formulated, as with a number of sites of this scale, Ribble Valley Borough Council (RVBC) would prefer to see this progressed through the LDF process to enable the issues it would present to be considered within the wider context of formulating a development strategy for the Borough and specifically taking account of development issues in Longridge. However, as the proposals are for residential development and RVBC cannot currently demonstrate a 5-year housing land supply, Planning Policy Statement 3: Housing (PPS3) is applicable.

In considering housing development, paragraph 71 states that where LPAs cannot demonstrate an up to date five year supply of deliverable sites they should consider favourably planning applications for housing having regard to the policies in PPS3 including the consideration in paragraph 69, which states that in deciding planning applications, Local Planning Authorities should have regard to,

- achieving high quality design,
- ensuring developments achieve a good mix of housing,
- the suitability of a site for housing, including its environmental sustainability,
- using land effectively and efficiently; and
- ensuring the proposed development is in line with planning for housing objectives.

However as discussed during the meeting, the retention of the top portion of the site as a barrier between the existing development on Higher Road and the potential new...
housing development on the site, the subject of this Pre-Application Enquiry, is considered to be much more acceptable. Bearing this in mind, as well the information contained within my two earlier paragraphs, it is considered that in principle, on the basis of the limited information submitted to date, the lower two sections of the site meet the PPS3 criteria in planning policy terms in relation to the suitability of the site for housing.

There will of course be potential issues relating to visual impact, design, impact on views into and out of the Longridge Conservation Area, environmental sustainability and effective land use, as well as planning for housing objectives, which will need to be discussed in further detail until the site can be considered to fully comply with all the requirements of paragraph 69 of PPS3. In addition to this, there is a requirement to fully comply with the relevant Policies relating to the above within the adopted Districtwide Local Plan.

In relation to this and the minimum level of affordable housing required on the site, there are a range of issues that need to be considered. The site is closely related to the settlement boundary of Longridge, and the Affordable Housing Memorandum of Understanding (AMOU), which is a material planning consideration, is intended to be both complementary with and supplemental to the relevant policies contained within the Districtwide Local Plan with the later clearly placing the site within open countryside where Policy G5 would require development to be 100% affordable. However, as stated, the site is closely related to the settlement boundary and in such an instance, having regard to the current 5 year housing land supply and requirements of PPS3, the Council would adopt the approach outlined in paragraph 3.1 of the AMOU which states,

‘In Longridge and Clitheroe on housing developments of 10 or more dwellings (or sites of 0.5 hectares or more irrespective of the number of dwellings) the Council will seek 30% affordable units on the site’.

This approach is taken because of the particular location of the site in relation to the identified settlement boundary. The Council would therefore require a minimum of 30% of the site (under current proposals) to be for affordable housing which meets an identified local need. Additional information on the level of need and type of affordable housing required in Longridge can be obtained from the Council’s Housing Strategy team.

On the basis of the above, it is therefore considered that the proposed development, as outlined, conforms to the above tests for development within the PPS3 para 69 definitions and within relevant DWLP policy tests, and therefore could be supported subject to other material planning issues outlined below.

HOUSING
As discussed above, where the site is judged to be in a suitable location, in line with paragraph 3.1 of the Memorandum of Understanding, the Council will require that a minimum of 30% of the proposed units on site be available as Affordable Units, and that in accordance with Policy H21 of the DWLP, any application must be accompanied with details of who the accommodation will be expected to accommodate. This should include reference to the existing Longridge Housing Needs Survey, and how the cost of the accommodation will be matched to the incomes of these target groups. I can e-mail a copy of this Survey to you if you require, along with a general needs waiting list, that provide clear evidence of demand. I would also recommend the applicant makes contact
with an RSL as soon as possible, as securing grant is becoming more difficult and time consuming.

HIGHWAYS COMMENTS
During our initial discussions, the LCC Traffic and Development Officer raised no objections in principle on highway safety grounds to the proposal submitted, however he did note the following.

He would recommend one single access point to serve any new development off Dilworth Lane, which would provide an acceptable focus for movements to and from the site. There was some discussion concerning the development of frontage properties, accessed directly from Dilworth Lane, and whilst his preference would be for a single access to the site, there are neighbouring properties with private driveways to Dilworth Lane and limited direct access of this type to individual frontage properties could enhance the visual street scene and be acceptable, subject to further detailed discussions.

The Speed Limit at this location is 30mph but this location is on the fringes of existing residential development and compliance could be improved with some sympathetic traffic management improvements. While not discussed in detail, these could include interactive signing, road marking and signing measures, and whilst there could be some minor alignment changes as part of the sightline provisions, there are no significant engineering measures proposed or envisaged.

Consideration also needs to be given to the parking arrangements and road layout, and the provision of pedestrian and bicycle access within the site providing more direct links out of the site.

RENEWABLES
As stipulated by Policy EM17 ‘Renewable Energy’ within the Regional Spatial Strategy, and in line with guidance within the National Document PPS22 - Renewable Energy, the Council consider that on all residential developments comprising 10 units or more, the proposal should secure at least 10% of all their predicted energy requirements from decentralised and renewable or low-carbon sources, unless it can be demonstrated, having regard to the type of development or design, that this is not feasible or viable.

PUBLIC OPEN SPACE
In respect of Public Open Space provisions, it is considered preferable for some to be provided in line with the provisions of DWLP Policy RT8 however it is worth considering the following. As far as I am aware, it is unlikely that the Borough Council would take ownership or management of this area of Open Space, and ultimately the responsibility would therefore fall with the applicant, developer or indeed the RSL.

ECOLOGICAL ISSUES
Having discussed the proposal with our Countryside Officer, David Hewitt, he raised no objections in principle to the scheme proposed, however he has stressed that the following information should be provided at the earliest opportunity in order to fully assess the impact of the development on the site,
- Details on existing trees including location, DBH, species,
- Any rights of way, and
- details of new planting including tree types, species and density.
In addition, a Phase One Habitat Survey of the site may also be beneficial to the decision making process.

OTHER ISSUES
It is also important to stress that we must require absolute proof that any possible application we are called upon to consider includes provision to meet all resulting infrastructure needs. This includes (inter alia)

- Highway capacity,
- Water supply and waste,
- Energy supply,
- Provision for affordable housing both in line with our policy as amplified in the Affordable Housing Memorandum of Understanding and on the basis of an up to date and reliable survey of need. In this respect the requirements of saved Policy H21 of the DWLP are of paramount importance,
- Education provision at each level,
- Community facilities
- Transport infrastructure for walking cycling and public transport,
- Biodiversity issues, and
- any other site-specific matters not covered by the above.

CONCLUSION
On the basis of the information and plans supplied, the scheme would represent an extension to the defined settlement but would be contained within clear physical boundaries. Longridge is the second largest settlement within the Borough and provides a range of services and community infrastructure, and the overall scale of what is proposed in itself is not considered significant in terms of overall numbers in relation to Longridge. It is important in considering any application to have full supporting information to judge the adequacy of infrastructure provision to serve the development and to be satisfied that any proposal is not going to be detrimental to service provision in the area. Highways, drainage and education infrastructure are also important considerations, as is information relating to affordable housing. Any application must therefore be supported by robust survey and analysis to judge the adequacy, and as appropriate, any delivery programme for associated infrastructure. In addition, its also considered important that any proposal include a phasing plan for the development, as this will help us consider the various implications regarding service needs, such as Education.

To summarise, I therefore consider that the proposed development, as outlined, conforms to the above tests for development within the PPS3 para 69 definitions and within relevant DWLP policy tests, and therefore could be supported subject to other material planning issues outlined above.

I hope this advice is useful, but please note, this is an officer opinion only and whilst my comments are made for your information and guidance only, they are without prejudice to any recommendation the Council may make on any subsequent application or the ultimate determination thereof.

Yours Sincerely,

GRAEME THORPE
SENIOR PLANNING OFFICER

Mike Gee,
Janet Dixon Town Planners LTD,
10A Whalley Road,
Clitheroe
BB7 1AW
We ask that the following comments and suggestions be fully taken into account to properly inform the further stages of the Core Strategy.

Our response is structured to follow that of the Consultation Document.

Chapter 3 – Setting a Vision for the Area

We submit that the Core Strategy vision is lacking a spatial focus. Specific reference should be made to which settlements are the Key Service Centres (in our submission to include Longridge), and the roles they can perform in providing suitable foci for housing and business development whilst enabling protection of the considerable environment or assets of the Borough.

The strategic objectives at 3.3 refer to housing needs and affordable housing (3.3.3 and 3.3.4). However, the supply of general housing should also be set out as a clear and explicit strategic objective for the Core Strategy.

Chapter 4 – Development Strategy

We recognise the need to generate strategic spatial options in order to assess the most appropriate strategic spatial framework for the management of development. However, in our submission the options developed do not necessarily:

- reflect the overall vision;
- demonstrate clear justification; and
- show an accord between each description and detailed content.
Our more detailed comments and suggestions are made in relation to each of the options.

In developing the options, we submit that it is vital to recognise cross-boundary issues and working. This is most significant in respect of Longridge, being on the very edge of the Borough. Longridge has a strong functional relationship with Preston. Rural communities in Preston look to Longridge as a Service Centre and, in turn, Longridge looks to Preston for higher-order facilities. There are good public transport links between the two. This inter-relationship is recognised in the Central Lancashire Core Strategy, which identifies Longridge as a Key Service Centre. We submit that the Ribble Valley Core Strategy should similarly recognise this inter-relationship and its significance for the role of Longridge.

Chapter 6 – Housing

We agree the Key Statement references at 6.1.2 to the average annual completion rate of at least 161 dwellings per year. Quite properly, this is based on the most up to date evidence available. We submit that the Statement should make it explicit that the Core Strategy should identify broad locations for development that would demonstrably provide for the continuous delivery of housing for at least 15 years from the date of its adoption. To do otherwise would render the document inconsistent with national planning policy (in particular PPS 3) and, thus, unsound. Indeed, the document should be absolutely clear as to base and horizon dates, which are presently lacking.

We agree the Statement at 6.1.4 that the housing figures will be treated as a minimum target.

Whilst not disagreeing with the Key Statement on housing balance at 6.1.5, we would stress the need for the council to maintain up to date Housing Needs Surveys and a Strategic Housing Market Assessment.

An important implication of evidence referred to at 6.1.11 is that there will be a need to release greenfield sites for housing development. This should be explicitly recognised within the Core Strategy.

Chapter 8 – Delivery Mechanisms and Infrastructure

We note the reference in the Key Statement on planning obligations at 8.1.10 that obligations will be negotiated for various matters including affordable housing. We would emphasise national advice that planning obligations should only be used in instances where conditions would not suffice. We would emphasise that in most cases conditions can be used, rather than planning obligations. For instance, the Planning Inspectorate have a list of model conditions on their website. This includes one for the delivery of affordable housing. National guidance should be adhered to and conditions used wherever possible. We submit that the Core Strategy document should reflect that.

We note the Key Statement on transport considerations at 8.1.11. We recognise the significance of public transport. However, a site’s or general location’s suitability for development should not necessarily be judged by how convenient or accessible it is to current public transport provision. We submit that a site’s or general location’s suitability for development should be determined by its potential for public transport accessibility. Some sites or locations may not presently offer good public transport accessibility, but have the
potential to. This may often be with consequent benefits for public transport accessibility for existing residents. We submit that the Core Strategy should recognise this.

Appendix 3: Housing Distribution Options

General

We note that the total number of dwellings referred to in each option is 1500. On the basis of an annualised housing provision of 161 dwellings, the 1500 figure equates to only 9.3 years supply of housing land. We would reiterate our earlier comment that the document must provide for 15 years supply of housing land from the date of its adoption. This is a requirement for it to accord with national policy and to be found sound. We submit that the number of dwellings to be provided for should be a minimum of 2415 from the date of the Core Strategy’s adoption.

Option 1

We note that this option is described as directing development towards the three Service Centres including Longridge. We support that statement in principle and the acknowledgement that there would be a need to expand their existing settlement limits to accommodate residential and employment growth. However, the table at OP1.2 displays a very unequal distribution of housing, with only 5% allocated to Longridge. We submit that only 5% or 75 dwellings allocated to Longridge is totally inadequate. This very low level of growth is not supported by any technical evidence or reasoned justification. This fails to reflect:

- Longridge’s needs for natural growth;
- The appropriate role Longridge should perform in meeting the borough’s overall development requirements, given its status as a key service centre;
- The Core Strategy’s overall vision to sustain vital and vibrant market towns;
- The role Longridge presently and should continue to play as a key service centre to communities within and beyond the borough; and
- The potential Longridge’s infrastructure has to facilitate and accommodate growth.

We strongly support the general identification of the Longridge area of search 1D. We would, however, suggest that the area of search be more focused to include land to the north of Dilworth Lane, as shown on the attached plan by red circle. This would achieve a better integration, visually and functionally, into the form and structure of the town, being a natural ‘rounding off’. We agree that this location is in a sustainable location and the area has no recognised ecological value. We have assessed other options for extensions to the settlement within the Borough and conclude that the area to the north of Dilworth Lane has the greatest potential for development that would satisfy normal planning and sustainability considerations. Your SHLAA clearly demonstrates that this is a suitable, achievable and deliverable location for development in the 0-5 year period and scores well in relation to sustainability and planning criteria (eg see SHLAA site 038).
Option 2

We note that this option is described as focusing development towards Longridge. However, the table at OP2.2 displays a somewhat different picture, with equal levels of growth to Clitheroe, Whalley and the villages and only a slight bias towards Longridge. Having said that, we would generally support the level of growth that is directed towards Longridge. Indeed, the infrastructure in Longridge could well support such levels of development in and adjoining the town.

We would comment on and support development at Longridge area of search 2D for the reasons given above for 1D. Your SHLAA clearly demonstrates that this is a suitable, achievable and deliverable location for development in the 0-5 year period and scores well in relation to sustainability and planning criteria (eg see SHLAA site 038).

Option 3

We note that this option is described as providing development in the Borough through the strategic release of sites that can accommodate high levels of development, including the growth of Service Centres. However, the table at OP3.2 displays a somewhat different picture with the lowest levels of development of all of the options allocated to the three Key Service Centres. This is most particularly the case with Longridge, in that only 3% or 45 dwellings are provided for. This is considered to be totally inadequate. This very low level of growth is not supported by any technical evidence or reasoned justification. This fails to reflect:

- Longridge's needs for natural growth;
- The appropriate role Longridge should perform in meeting the borough's overall development requirements, given its status as a key service centre;
- The Core Strategy's overall vision to sustain vital and vibrant market towns;
- The role Longridge presently and should continue to play as a key service centre to communities within and beyond the borough; and
- The potential Longridge's infrastructure has to facilitate and accommodate growth.

Conversely, by far the highest level of growth is allocated to the villages under Option 3. We strongly oppose this option as it fails to respect or accord with the overall vision to sustain vital and vibrant market towns. Quite clearly, the vision should inform the generation of options. It patently fails to do so in this case. This option fails to recognise the capacity of the three key service centres, including Longridge, to accommodate the level of growth to be planned for borough wide. Also, this option fails to spatially demonstrate how some 60% of housing development is to be accommodated.

The level of allocation to each of the three main towns (and, most particularly, Longridge) is wholly inadequate to be effective in delivering that vision and thus any Core Strategy based on Option 3 would have to be found unsound. We would reiterate that there appears to be no technical or other justification for this option. Thus, this option would also be found unsound as it is not justified or supported by evidence. Nor, would the infrastructure and other
ingredients for appropriate sustainable growth based on sound planning principles be available in the rural villages to support this level of growth indicated by Option 3.

Summary and Conclusions

To summarise, we submit:

- The Core Strategy should provide for housing for a minimum 15 year period from anticipated adoption, equating to at least 2415 dwellings (and not the 1500 dwellings referred to in the options);
- That the vision is lacking a spatial focus and should refer to which towns comprise the Key Service Centres. This should include Longridge;
- There is a need to explicitly recognise the need to release greenfield sites for housing development;
- That the provision of general needs housing should be recognised as a strategic objective of the Core Strategy; and
- That cross-boundary issue should be recognised with particular relevance to Longridge.

We support:

- A minimum annual housing provision level of 161 dwellings for the whole of the Core Strategy period;
- The higher level of housing development growth allocated to Longridge under Option 2; and
- Areas of search 1D (Longridge), although with the focus being on the area north of Dilworth Lane as per the attached plan, and 2D.

We oppose:

- The 1500 dwelling figure used in each option. The figure provided in the Core Strategy should be a minimum of 2415 dwellings from adoption, to allow for the 15 year plan period at an annual housing provision level of 161 dwellings;
- The extremely low levels of housing growth allocated to Longridge under Options 1 and 3, as this is not founded on any technical justification or evidence and fails to utilise the infrastructure / services / facilities available in Longridge; and
- Option 3 as the high proportion of housing development associated with the villages / growth areas lacks spatial focus and is not founded on any technical evidence or justification.

Should you require any further information or clarification in respect of our submissions please feel free to contact us.

We look forward to being advised of your further considerations in this matter, your reasoning and an invitation to contribute to the further stages of the Core Strategy.
have been examined by an Independent Inspector from the Planning Inspectorate (PINS).

MAP TO SHOW AREAS OF SEARCH: LONGRIDGE OPTION ONE

---

© Crown Copyright Reserved Ribble Valley Borough Council Licence No LA 100018541 07 July 2010

Key

- Open Countryside
- Existing Employment Area
- Area of Search
- Area outside of Ribble Valley boundary

Water (River/Reservoir)
Existing Settlement Item
Central Retail Core
Road
Railway

NB: Additional Areas of Search not identified here might be identified at a later stage as further evidence base work is undertaken.