Philip Dagnall

From: [REDACTED]
Sent: 20 June 2012 12:52
To: Philip Dagnall
Subject: Objection to Core Strategy Regulation 19
Attachments: objection to core strategy_form.pdf, Core Strategy Reg 19 object.pdf

Mr Dagnall

Further to your telephone conversation with Val Kendall of this office yesterday, I attach for the Council’s consideration an objection to the Core Strategy Regulation 19 on behalf of our clients. We would apologise for the lateness of this objection but would ask if this could be considered along with other representations received.

We look forward to hearing from you.

Regards [REDACTED]

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21/06/2012
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.
Please use a separate form for each individual comment.

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

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

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

- i) Legally compliant [Yes] [No]
- ii) Sound * [ ]

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

Q5
If you consider the Core Strategy is unsound, is this because it is not... (please tick the appropriate box)
- Justified [ ] Consistent with national policy [ ]
- Effective [ ] Positively prepared [ ]

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

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

See attached 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.

See attached letter.

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

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

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

Q12 Date of completion

13/04/2012

Q13 Signature

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

If after reading the Guidance Notes you should have any queries in completing this form please telephone 01200 425111
19 June 2012

Our ref.: AK/VK/HINE/01

Forward Planning Section
Local Plans
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

Dear Sir

OBJECTION TO CORE STRATEGY REGULATION 19

We have a number of objections, detailed below.

With regard to Key Statement DS1: Development Strategy, there is a mismatch between the stated aim of concentrating the majority of new housing within the Standen strategic development site and the main urban areas of the Borough, and the focus of employment development opportunities principally at Barrow Enterprise Site and Salmesbury Enterprise Zone with only small scale development elsewhere. Such an approach will not give rise to sustainable development as required by the National Planning Policy Framework (NPPF). In particular, it will not encourage one of the core planning principles that underpin securing sustainable development, namely the need to promote mixed use developments. Elsewhere, the Core Strategy states that some employment opportunities will be provided within the strategic development site, but at this early stage there is no meaningful provision and assumptions should not be made. Accordingly deliverability is in question.

With regard to the principle of Standen strategic development site, paragraph 4.4 of the Core Strategy justifies this proposal by saying that this has commonly been cited as a preferred option by respondents to previous consultation “... when assessed against the other seven potential options ...”. If the analysis is correct, it merely demonstrates that this was the most attractive of the options and not the best option for the Borough, which might not have been presented as an option. The level of public opposition to this
proposed strategic development site does not suggest that the proposal reflects the majority of local opinion.

Even with the modifications described, including a reduction in the number of housing units, the strategic development site will give rise to an inappropriately large number of dwellings in Clitheroe, which the existing facilities will be unable to support. Furthermore other settlements will not benefit from new development that is necessary to enable the strategic development site, thus exacerbating the imbalance. The table in paragraph 15.2 sets out the residual number of houses required for each of the main settlements. This relies on the major assumption that the Standen Strategic site will actually be developed but there are questions regarding deliverability.

The justification goes on to describe how the population distribution approach has been applied to the key service centres, with the remaining 33% for distribution amongst the other settlements. Development could effectively be on a first come first served basis, whereas applications for development that is acceptable in principle should be determined on their merits. The Core Strategy proposes the perpetuation of what is now an historic hierarchy, and an argument can be made that as circumstances change over time the status of settlements, rather than being set in stone, ebb and flow. Barrow is a case in point.

In the Ribble Valley Districtwide local plan adopted back in 1998, Barrow was amongst the settlements described as villages, within which development was severely restricted. Nevertheless, outline planning consent had been granted in 1990 for the redevelopment of a 19 hectare site for offices, light industrial use, hotel/conference centre and housing with associated access roads and car parks on the former Barrow Printworks site. Planning permission for the undeveloped areas remains extant in perpetuity. Some of the site has since benefitted from planning consent for residential use which has been and is being implemented. Nevertheless, the substantial area that will be in employment use is disproportional for the size of the village, both in terms of acreage and facilities in the village.

Policy DS1 identifies the Barrow Enterprise Site as a main location for employment in the Borough, which in the light of the planning history of the area, the substantial benefits to be obtained from proximity to the A59 and the evidence base specifically the Employment Land and Retail Study is unsurprising, and is a proposal with which we would concur. However such status should be accompanied by the acknowledgement that Barrow can never again be a small village, with development restricted as described in policy DS1. Accordingly, it is appropriate that a larger proportionate share of the housing provision required in the Borough is directed specifically to Barrow. A deliverable housing site is available, pending an appeal decision.

Elsewhere in the Core Strategy constraints to development are correctly identified. They include the fact that more than 75% of the area of the Borough is within a designated Area of Outstanding Natural Beauty, and the numerous heritage assets. This fact lends weight to the idea that Barrow, which is not so constrained, should be allowed more development than other villages where there are different priorities.
Key Statement H1: Housing Provision describes making sufficient land available to deliver 4,000 dwellings through the plan period, which equates to an average annual completion rate of at least 200 dwellings per year. There is reference to a formal review within five years of the adoption of the Core Strategy, but in the light of evidence that more housing will be required and a need to boost the economy, the stated housing provision may be insufficient. The evidence is provided by a report commissioned by the Council from Nathaniel Lichfield and Partners which indicated that between 190 and 220 units might be needed per year in the period 2008-2028. The report also notes that if the most recent CLG housing projections are used they indicate a requirement for approximately 5,190 dwellings through the plan period, or 260 completions per year.

Within Key Statement H3: Affordable Housing is a requirement for housing which specifically meets the needs of the elderly. No definition of ‘elderly’ is provided in the glossary, and the needs which the policy is trying to address should be specified more clearly. Furthermore, although Key Statement DM1: Planning Obligations indicates that Planning Obligations will be used to secure the provision of affordable housing and its retention in the future, no such protection is afforded to the elderly provision. Elderly accommodation could be attractive to first time buyers if it is small and therefore at the cheaper end of the market, and attractive to single parents for instance if it is single storey with a small garden.

Key Statement EC1: Business and Employment Development does not make reference to Barrow Enterprise Site, although the preceding paragraph 7.4 states that “It is recognised that suitable locations that are well related to the A59 corridor will also have the potential to deliver economic growth through the delivery of appropriate sites”, although what might comprise ‘appropriate’ is not defined. There should be closer correlation with Key Statement DS1.

Finally, the Core Strategy requires amendment because it doesn’t demonstrate compatibility with the National Planning Policy Framework.

Yours faithfully