

Gladman Developments Ltd

Ribble Valley Core Strategy

EiP Hearing Statement

Matter 1 – Basis for the Overall Approach

Matter 2 – The Strategy

Matter 3 – Housing



January 2013

1 INTRODUCTION

- 1.1. Gladman Developments (Gladman) makes this submission to the Examination in Public (EiP) having previously made written representations on Ribble Valley’s Publication Core Strategy in June 2012 and Core Strategy Main Changes in November 2013. This hearing statement provides the context for the representations to be made by Anthony Gill (Counsel) and Phill Bamford (Gladman Developments) at the EiP.
- 1.2. These representations focus on the Council’s Duty to Co-operate and the strategic approach to the distribution and level of housing sought in the borough. In particular they demonstrate the inherent soundness of the Longridge Adjustment, which reflects the consistently recognised ability of land to the West of Whittingham Road (in Preston City Council’s administrative area) to deliver housing to meet Longridge’s needs. The statement is structured to respond to specific matters and issues raised by the Inspector. The main issues to be addressed are as follows:
- **Overall, has the plan been prepared in accordance with the legal requirements, including the ‘duty to cooperate’ imposed by Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended)?**
 - **Will the Plan deliver the home, jobs and services required to meet the needs of the whole borough? How have needs in other adjacent authority areas been taken into account? Overall, is the distribution of development sought the most appropriate strategy, and what alternatives have been rejected?**
 - **What is the justification for the ‘Longridge adjustment’? Is the proposed re-apportionment across other settlements (excluding Clitheroe and Whalley) the most appropriate course?**
- 1.3. As detailed through this submission **Gladman conditionally supports the case for the Longridge adjustment and submits that this represents the best strategy for meeting the future housing needs of the town.** The Longridge adjustment is the outcome of long-standing, collaborative working between Ribble Valley and Preston City Council reflecting the recognised potential of Land at Whittingham Road, to the west of Longridge in Preston, to provide an allocation for 280 dwellings.
- 1.4. Ribble Valley has sought to engage constructively, actively and on an ongoing basis over the development of Land at Whittingham Road and the positive outcome of this process is reflected in the Longridge adjustment. As demonstrated through this hearing statement there is no land use planning or evidential basis for Preston City Council’s recent, unjustified volte face from the consistent, collaborative approach to this matter. **There is therefore no basis for reducing or removing the Longridge adjustment.**

- 1.5 Gladman submits that the Council's revised overall housing requirement **is still too low to meet the Council's full, objectively assessed needs, as required by paragraph 47 of the NPPF**. The Council has not based its revised housing requirement on its evidence or planned to deliver the 280 dpa that, as shown by Nathaniel Lichfield and Partners (NLP) in their report for the Council¹, are evidently required to meet the needs of the borough. **This housing requirement is therefore unsound.**

2 LEGAL COMPLIANCE – DUTY TO COOPERATE

Overall, has the plan been prepared in accordance with the legal requirements, including the 'duty to cooperate' imposed by Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended)?

- 2.1 In order to comply with the Duty to Cooperate Ribble Valley Borough Council must be able to demonstrate that it has co-operated constructively, actively and on an on-going basis with its neighbouring local planning authorities on strategic matters. The Government expects joint working to be diligently undertaken for the mutual benefit of neighbouring authorities.
- 2.2 In the context of fulfilling the Duty to Cooperate in Ribble Valley, Gladman refers to the Longridge adjustment. The Longridge adjustment is the outcome of long-standing, positive collaborative working between Ribble Valley and Preston reflecting the consistently recognised potential to allocate Land at Whittingham Road, to the west of Longridge in Preston, for 280 dwellings. This allocation was put forward in both the Issues and Options and Preferred Options stages of Preston's Local Plan: Site Allocations and Development Management DPD. It is supported by the findings of the 2010 Central Lancashire SHLAA and conforms to the adopted Central Lancashire Core Strategy. Policy 1 of the Central Lancashire Core Strategy designates Longridge as a Key Service Centre "*Where land within Central Lancashire may be required to support the development of this key service centre in Ribble Valley, with paragraph 3.13 of the Central Lancashire Core Strategy Spatial Portrait stating that "The town serves rural areas to the north and east of Preston and could potentially be developed westwards into Central Lancashire"*.
- 2.3 Preston City Council has now withdrawn from this position in its Publication Local Plan document, reducing the scale of the allocation to 90 dwellings and designating the majority

¹ Nathaniel Lichfield and Partners (2013) Implications of the 2011-based CLG Household Projections – Ribble Valley Housing Requirement Update

of the site as an Area of Separation. However, as outlined in more detail in response to Matter 3 below, Gladman submits **that there is no land use planning basis or justifiable evidence for this decision and it is solely the result of a last minute volte face contrary to the previous political consensus.** This is further emphasised by Preston City Council's position in relation to Gladman's ongoing appeal² for a mixed use proposal, including 220 homes, on the southern portion of Land at Whittingham Road (Site location map provided as Appendix 1), where the Council has withdrawn its two putative reasons for refusal - the impact on the highway network and the impact of the development upon the Area of Separation. **This demonstrates that Preston City Council does not object to an element of the scheme coming forward in spite of its stated commitment to a 90 dwelling allocation. Its position is therefore fundamentally undermined.**

2.4 Ribble Valley has sought to engage constructively, actively and on an ongoing basis over the development of Land at Whittingham Road and the positive outcome of this process is reflected in the Longridge adjustment. There is no justification for Preston City Council's decision to now retract from its consistent position in relation to Land at Whittingham Road or to withdraw from its cooperation with Ribble Valley on this matter. Gladman therefore submits **that there is no basis for deleting or reducing the Longridge adjustment in Ribble Valley's Core Strategy and Preston should fulfil its already agreed to obligations on this matter. Indeed the progress of the current Whittingham Road appeal justifies the Longridge adjustment.**

2.5 Land at Whittingham Road represents the most sustainable and suitable site to meet Longridge's housing needs. It benefits from close proximity to the town's range of services and facilities whilst its development would result in a logical extension to the settlement with the least environmental impact. In support of this view Gladman have undertaken a comparative analysis of the site for its ongoing appeal using the 2009 Ribble Valley SHLAA methodology. This is provided as Appendix 3 of this submission. This reveals that this location scores significantly higher than the other identified sites around the town contained within the Ribble Valley SHLAA, from a suitability, sustainability and proximity to services perspective. It is the case that this site can suitably accommodate a development of 420 dwellings. **This must be reflected in the Core Strategy and through the Longridge adjustment.**

² Appeal Reference APP/N2345/A/13/2202762

3 MATTER 2 – THE STRATEGY

Will the Plan deliver the homes, jobs and services required to meet the needs of the whole borough? How have needs in other adjacent authority areas been taken into account?

- 3.1 The Council’s proposed main change to Key Statement H1: Housing Provision sets out a revised overall housing requirement of 5,000 dwellings over the Core Strategy period 2008-2028, equating to 250 dpa. This represents an increase of 1,000 dwellings over the Core Strategy target as submitted. **However, Gladman submits that this revised housing requirement is still too low to meet the Council’s full, objectively assessed needs and is therefore unsound.**
- 3.2 The Council prepared two pieces of updated evidence to inform its revised housing requirement – an updated SHMA and a report prepared by NLP looking at the implications of the 2011-based interim household projections³. The NLP report suggests the latest estimates and statistics for Ribble Valley point to a need for between 220 and 250 dpa in the borough, **with a requirement of 280 dpa providing a sufficient level of housing to meet the population and household projections for the borough, as well as the latest job forecasts for the authority.** Table 1 illustrates the projections modelled by NLP.

Table 1 NLP Ribble Valley Annual Housing Requirements

Scenario I: 2011-based CLG (Interim) H’hold Projections (2011-28)	Scenario J: Long Term Past Migration Trends (2011-28)	Scenario K: Short Term Past Migration Trends (2011- 28)	Scenario L: ELR Job Growth (2011-28)	Revised Range
221 dpa	214 dpa	185 dpa	280 dpa	220-250 dpa

- 3.3 The Council has not based its revised housing requirement on its evidence or planned to deliver the 280 dpa that are evidently required to meet its full, objectively assessed housing needs. As suggested by its own consultants⁴, the authority needs to evidence the significant and demonstrable harm of meeting its full housing need, that justifies its decision to pursue a requirement lower than 280 dpa. The Council should also make provision,

³ Nathaniel Lichfield and Partners (2013) Implications of the 2011-based CLG Household Projections – Ribble Valley Housing Requirement Update

⁴ Nathaniel Lichfield and Partners (2013) Implications of the 2011-based CLG Household Projections – Ribble Valley Housing Requirement Update – Paragraphs 4.22-4.33

through the duty-to-cooperate, for those needs to be met in full elsewhere in the housing market area.

- 3.4 The Framework sets out a clear process that must be followed when identifying and meeting objectively assessed needs, as set out in paragraphs 47, 158, 152 and 14 The Council should begin by identifying its full, objectively assessed needs, taking economic requirements into account, then show whether any adverse impacts would significantly and demonstrably outweigh the benefits of meeting these needs in full. This process is emphasised in the recent High Court and Court of Appeal judgements in *Hunston Properties Limited v. (1) Secretary of State for Communities and Local Government and (2) St Albans City and District Council [2013]*^{5,6}. Taking the requirements of the Framework into account **Gladman submits that the Council needs to revisit its proposed housing figure in order for the Plan to be found sound.**
- 3.5 Gladman commissioned Regeneris consulting to undertake a brief review the Council's updated housing evidence in response to the Core Strategy Main Changes consultation. This work is provided as Appendix 2 to this submission and supports Gladman's position.
- 3.6 Regeneris believes that it is clear based on the objectively assessed needs for the borough and NLP's evidence **that at the very least the housing requirement for Ribble Valley should be 280 dpa.** This requirement aligns with the figure the Council will be using to plan for future employment land supply and would be consistent with the potential for further 'policy on' economic developments that could add to the pressure on labour supply in Ribble Valley. It is intellectually inconsistent to plan for employment based on one figure and housing provision upon another.
- 3.7 Regeneris finds that the Council fails to properly use the updated evidence base at its disposal and has set out a revised housing number that still fails to meet the objectively assessed need in the Ribble Valley. It has not provided any convincing evidence that the economic and housing consequences that would arise from a figure below 280 dpa can be mitigated in accordance with paragraph 152 of the NPPF. **Gladman therefore submits that the revised housing requirement for the borough still leaves a Core Strategy that is unsound.**

⁵ *Hunston Properties Limited v. (1) Secretary of State for Communities and Local Government and (2) St Albans City and District Council [2013] EWHC 2678 (Admin)*

⁶ *City and District Council of St Albans v. (1) The Queen (on the application of) Hunston Properties Limited and (2) Secretary of State for Communities and Local Government [2013] EWCA Civ 1610*

The Plan’s development strategy is set out in Key Statement DS1. It focuses new housing, retail and leisure in Clitheroe, Longridge and Whalley and new economic development at the Barrow Enterprise site and the Samlesbury Enterprise Zone. In broad terms, is this the most appropriate spatial strategy?

Is the settlement hierarchy based on robust evidence and sound reasoning? Will this hierarchy lead to the most sustainable spatial distribution of new development? In this respect, are the conclusions of the Sustainability Appraisal founded on robust evidence and sound reasoning?

Overall, is the distribution of development sought the most appropriate strategy, and what alternatives have been rejected?

- 3.8 Gladman is generally supportive of the Council’s settlement hierarchy. Growth should be directed to key sustainable settlements with established sustainability credentials to create sustainable communities that have good access to a range of jobs, housing, community facilities and key services and infrastructure. However the Council’s approach should not overlook the needs of lower order, but still sustainable settlements, which could also help to sustain existing facilities and services. The amount of growth required in each of the borough’s settlements needs to be considered in the context of the authority’s full, objectively assessed needs.
- 3.9 Gladman particularly supports the decision to direct development towards Longridge as one of three Key Service Centres in Ribble Valley. The town is the second largest settlement in the borough and represents a highly sustainable location for further development, providing a wide range of services and facilities to its community and wider hinterland. The town also acts as a key service centre in the Preston authority area, a fact recognised in Policy 1 of the adopted Central Lancashire Core Strategy. Gladman therefore submits that Longridge provides a sustainable location for further development to meet the borough’s and the settlement’s housing needs. The level of development directed towards Longridge must reflect the role of the town.
- 3.10 Longridge’s role as a Key Service Centre for both Ribble Valley and Preston authority areas, the recognition in the Central Lancashire Core Strategy that the town could be developed westwards into Preston, and the consistently accepted potential for housing development to the west of Whittingham Road **supports the basis for the Longridge adjustment and that this is an appropriate strategy for meeting Longridge’s future housing needs**. This is discussed further in our response to Matter 3 below.

4 MATTER 3 – HOUSING

As submitted, the Plan sought to deliver 4,000 new homes between 2008 and 2028. The Council proposes to increase this to 5,000. What is the explanation for this proposed modification, and why is it necessary for soundness? What evidence has led to the 5,000 figure being proposed? Is this a reliable source of evidence? What regard has been had to the Government’s household interim projections for 2011-2021?

- 4.1 As discussed in response to Matter 2 above Gladman submits that the proposed increase in the Council’s housing requirement from 4,000 to 5,000 dwellings **still leaves a Core Strategy that is unsound**. The Council’s own updated evidence prepared by NLP suggests that the authority needs to provide **280 dpa, or 5,600 dwellings over the Core Strategy period 2008-2028**, to align with future employment growth in the borough. The Council has not based its requirement on this evidence or taken proper account of the 280 dpa figure in its consideration.
- 4.2 **The inadequacies of the Council’s proposed requirement is emphasised in several elements of NLP’s advice to the Council.** This includes that the Council “*would need to demonstrate how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower growth approach (i.e a figure below 280 dpa) could give rise to*”, that their preferred scenario of 250 dpa “*would support **some** economic growth and would deliver affordable housing to respond to (at least **some** of) identified local needs (emphasis added)*” and that more weight should be attached to the updated job growth scenario than previous employment growth scenarios as it is based on “*a more up-to-date and robust level of employment growth*”.
- 4.3 Whilst the Council’s evidence has had regard to the 2011-based Interim Household Projections⁷ **a future baseline housing requirement of 221 dpa** derived from using these projections will not be sufficient to meet the Council’s full, objectively assessed housing needs, taking account of the latest economic forecasts for the borough, in addition to the population and household formation assumptions that underpin this baseline scenario.

The overall level of new housing delivery appears heavily reliant on the strategic housing site at Standen. Is placing too much emphasis on one site an

⁷ Nathaniel Lichfield and Partners (2013) Implications of the 2011-based CLG Household Projections – Ribble Valley Housing Requirement Update – Scenario I

appropriate approach? What certainty is there that the Standen site is deliverable and will be delivered in the Plan period?

- 4.4 Gladman questions the Council's decision to direct a large proportion of its future housing requirements – 1,040 dwellings – to the Standen Estates site, south of Clitheroe. Large scale sites such as the strategic site at Standen often require significant infrastructure and planning prior to delivery and therefore significant lead in times need to be factored into proposals. Placing too much emphasis on this site could result in a shortfall on housing in the borough. Gladman therefore submits that the Council should be placing more emphasis on the delivery of growth through smaller/medium sized sites which can often deliver housing over a shorter time period.
- 4.5 As part of previous representations Gladman have submitted evidence prepared by Hourigan Connolly and presented during a public inquiry into an allowed appeal for 270 dwellings at Henthorn Road, Clitheroe in 2011⁸ demonstrating that the capacity of the Standen Estates site in particular may have also been over-estimated by 400 dwellings.
- 4.6 If the housing numbers directed to the Standen Estates are not deliverable then the Core Strategy as a whole **will not be implemented**. In relation to the tests of soundness outlined in paragraph 182 of the NPPF, in order to be effective **the Plan must be deliverable**. Gladman therefore submits that the Council should be directing development to a broader range of sites that still supports the Council's strategy but avoids the delays that can often occur when bringing large, sustainable urban extensions forward. This will help to ensure the Plan provides sufficient flexibility to address situations where housing does not come forward as expected.

How has the proportional split of housing been arrived at? What justifies this position?

- 4.7 The table at paragraph 4.11 of the Council's submitted Core Strategy illustrates the residual number of dwellings (taking commitments and completions into account) to be planned for in Clitheroe, Longridge and Whalley, and the authority's 'Other settlements' and through the Standen allocation. These residual requirements have now been amended through the Council's Core Strategy Main Changes to reflect the Council's revised housing requirement and the position as at 31st March 2013. The updated figures for each settlement are outlined in Table 2 below.

⁸Appeal reference APP/T2350/A/11/2161186

Table 2 Ribble Valley Residual Housing Requirements

Settlement	Submitted Core Strategy Requirement	Updated Residual Housing Requirement
Clitheroe	126	230
Longridge	558	550
Whalley	227	215
Other Settlements	583	732
Standen	1040	1040
Total	2,534	2767

4.8 The level of development directed towards Longridge must reflect the role of the town as the borough's second largest settlement and as a key service centre in Ribble Valley and for the north and east of Preston's administrative area. The town benefits from a good range of services and facilities and provides a highly sustainable location for further development. Gladman submits that the town could support a higher quantum of development that reflects the sustainability of the settlement and the full capacity of Land at Whittingham Road.

4.9 Gladman specifically submits that the Core Strategy should recognise the true capacity of Land at Whittingham Road, to the west of Longridge. **It is the case that this site can suitably accommodate a development of 420 dwellings, as shown through Gladman's Illustrative Development Framework (provided as Appendix 4), and represents the most sustainable and suitable site to meet Longridge's housing needs. This needs to be appropriately reflected through the Longridge adjustment.**

**What is the justification for the 'Longridge adjustment'? Is the proposed re-
apportionment across the 'other settlements' (excluding Clitheroe and Whalley)
the most appropriate course?**

4.10 Gladman conditionally supports the case for the Longridge adjustment and submit that **this represents the most appropriate strategy for meeting the future housing needs of the town.** As outlined below, **we submit that the Longridge adjustment should be increased to recognise the full potential capacity of Land at Whittingham Road.**

4.11 Longridge is located in the Ribble Valley but acts as a service centre in Preston City Council's administrative area. Recognising this role Policy 1 of adopted Central Lancashire Core Strategy designates the town as a Key Service Centre, "*Where land within Central*

Lancashire may be required to support the development of this key service centre in Ribble Valley". Paragraph 3.13 of the Central Lancashire Core Strategy Spatial Portrait states that *"The town serves rural areas to the north and east of Preston and could potentially be developed westwards into Central Lancashire"*.

- 4.12 The Longridge adjustment reflects the outcome of ongoing discussions between Preston and Ribble Valley and the consistently agreed position that Land at Whittingham Road, to west of Longridge in Preston would provide a suitable location for an allocation of 280 dwellings. This allocation was put forward in both the Issues and Options and Preferred Options stages of Preston's Local Plan: Site Allocations and Development Management DPD. It is also supported by the findings of the 2010 Central Lancashire SHLAA, which found that the site is a suitable location for an open countryside urban extension for 284 dwellings.
- 4.13 Preston City Council has now withdrawn from this position in its Publication Local Plan, reducing the allocation to 90 dwellings on an area of previously developed land and designating the majority of the land as an Area of Separation. However, reviewing Preston's justification Gladman submits **that there is no land use planning basis or justifiable evidence for this decision and it is solely the result of a last minute volte face contrary to the previous political consensus. We note that this view is also taken by Ribble Valley.** In a report to the Council's Planning and Development Committee dated 7th November⁹, Ribble Valley officers stated that the reduction of the Whittingham Road allocation appears to be related to the strength of local opinion, with an Area of Separation being used to **prevent** development rather than to **protect** a small area of open countryside. Gladman agrees that the proposal of an extension of the Area of Separation is a misuse of the policy to frustrate development rather protect an appropriate area of high quality countryside.
- 4.14 The basis for Preston's reviewed approach to Land at Whittingham Road is also questionable in the context of Gladman's current planning application on the site. Gladman is in the process of advancing an outline application for a mixed use, residential-led development including the provision of 220 dwellings on the southern half of Land at Whittingham Road, whilst we submit that the northern half of the site has the potential to deliver a further 200 homes in the future. **The site therefore has a total potential capacity of 420 dwellings.**
- 4.15 Gladman has now appealed the outline application submitted for the site on the basis of non-determination. Since submitting the appeal Preston City Council has resolved to refuse

⁹ Preston Local Plan 2012-2026 Publication Version, Report to Ribble Valley Borough Council's Planning and Development Committee, 7th November 2013

the application with two grounds for refusal – the impact on the highway network and the impact of the development upon the Area of Separation. However the Council has now withdrawn these putative reasons for refusal and is not presenting evidence at the inquiry timetabled to commence on 15th January 2013. **This demonstrates that Preston do not object to an element of the site coming forward and indeed for more dwellings than proposed in Preston’s recently changed policy position.**

- 4.16 Land at Whittingham Road represents the most sustainable and suitable site to meet Longridge’s future housing needs. To support this view Gladman has undertaken a comparative analysis of the site for its ongoing appeal using the 2009 Ribble Valley SHLAA methodology. It is evident from this assessment that the site scores significantly higher than other sites identified around Longridge within the SHLAA, from a suitability, sustainability and proximity to service provision perspective. It is clear from the assessment that Land at Whittingham Road performs better than those sites identified within the Ribble Valley SHLAA. The comparative SHLAA Review is attached as Appendix 3 to this submission.
- 4.17 Ribble Valley has sought to cooperate constructively, actively and on an ongoing basis in relation to Land at Whittingham Road and the positive outcome of this process is reflected in the Longridge adjustment. This is a vanguard example of the positive outcomes on cross-boundary strategic issues envisaged by the Duty to Cooperate. The administrative boundaries of Preston and Ribble Valley should not be seen as a constraint to bringing forward the most sustainable and suitable opportunity to meet Longridge’s housing needs.
- 4.18 It is Gladman’s view that that there is no justification for Preston’s reviewed approach to development on Land at Whittingham Road and the Longridge adjustment should remain¹⁰. Bringing forward land in Preston to meet Longridge’s needs represents a positive and co-ordinated strategy between the two authorities. Departing from this position now would be contrary to the principles of the Duty to Cooperate. There is no basis to Preston’s decision to withdraw from its consistent position in relation to this matter. This will only serve to undermine the role of Longridge as a Key Service Centre and Ribble Valley’s strategy for the town.
- 4.19 Conversely it is the case that the amount of development directed to Land at Whittingham Road **should be increased to reflect the true potential of this site to accommodate a development of 420 dwellings and that it represents the best and most sustainable site to meet Longridge’s housing needs. Particularly when the deliverability of the Standen site is so questionable.**

¹⁰ Indeed, it should be increased to acknowledge the true capacity.

- 4.20 Reducing the scale of the Longridge adjustment would have grave consequences for the delivery and soundness of Ribble Valley's Core Strategy. It would require the Council to reconsider the distribution of housing to 'Other settlements' in the borough, a change that cannot be undertaken without further work and delays to the Core Strategy process.

Is there a supply of specific deliverable sites sufficient to provide five years' worth of housing, with an additional buffer of 5% moved forward from later in the Plan period to provide choice? In the light of paragraph 47 of the NPPF, should the buffer be 20%? Are there sufficient deliverable sites to provide a 20% buffer?

- 4.21 It is the case that the Council **cannot currently demonstrate a five-year housing land supply** against its proposed Core Strategy housing requirement of 250 dpa. As shown through the Council latest housing land supply position as at 30th September 2013¹¹, at present there is a 4.34 year housing land supply in the borough. This position correctly factors in a 20% buffer for persistent under delivery and is based on addressing the shortfall of housing in the borough since 2008 using the Sedgefield method. The Council has failed to meet its proposed housing requirement in any year since 2008.

Table 3 Comparison of housing land supply scenarios as at 30th September 2013

	250 dpa	280 dpa
Claimed supply	1,930	1,930
Five year need	1,250	1,400
20% NPPF buffer	1,500	1,680
Completions April 2008 – 30 th September 2013	650	650
Shortfall April 2008 – 30 th September 2013	725	890
Total need	2,225	2,570
Total annualised need including buffer	445	514
Years supply	4.34	3.75

- 4.22 The under-supply of housing against the Council's five-year requirement **will be further pronounced in the context of the borough's full, objectively assessed need of 280 dpa**. Using the Council's methodology, the authority **is only able to demonstrate a 3.75 year housing land supply against this requirement**.

¹¹ Housing Land Availability, Report to Ribble Valley Borough Council's Planning and Development Committee, 7th November 2013

Is there sufficient land available in the right places to deliver the level and spatial distribution of new homes planned for?

- 4.23 Gladman specifically refers to Land at Whittingham Road, West of Longridge, in submitting that there is sufficient, available land to support Longridge’s development needs and in particular the Longridge adjustment. Land at Whittingham Road represents the best opportunity to meet the future development needs of Longridge. It benefits from close proximity to the town’s range of services and facilities whilst its development would result in a logical extension to the settlement with the least environmental impact.
- 4.24 There are no known constraints to bringing Land at Whittingham Road forward for development. The site is considered to be **a suitable, deliverable location for housing development**. As discussed above, this is further demonstrated through the consistent approach of Preston City Council in relation to allocating land in this location, the results of the 2010 Central Lancashire SHLAA and Gladman’s ongoing appeal on this site (which Preston is no longer resisting).
- 4.25 Gladman submit that Land at Whittingham road can suitably accommodate 420 dwellings. This should be reflected in the amount of development directed to the site through the Longridge adjustment

5 CONCLUSIONS

- 5.1 This statement has provided Gladman Developments’ submission the EiP of the Ribble Valley Core Strategy. It has focussed on the Council’s Duty to Co-operate and the strategic approach to the distribution and level of housing sought in the borough. In particular **it demonstrates the conceptual soundness of the Longridge adjustment**. However, it also shows that the Council is continuing to progress **a housing requirement that is too low to meet its full, objectively assessed need, which is fundamentally unsound**.
- 8.1 To be found sound at Examination **the Local Plan needs to meet all four of the tests of soundness outlined within paragraph 182 of the Framework:**

"A local planning authority should submit a plan for Examination which they consider is 'sound' – namely that it is:

- ***Positively prepared*** – *the plan should be prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure*

requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- **Effective** – *the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and*
- **Consistent with national policy** – *the plan should enable the delivery of sustainable development in accordance with policies in the Framework.”*

5.2 There is no basis or evidence supporting Preston City Council’s decision to withdraw from its long-standing co-operation with Ribble Valley in relation to Land at Whittingham Road. The position of Preston City Council is fundamentally undermined by its approach to Gladman’s ongoing appeal for mixed use development, including 220 dwellings of the southern portion of this site. The withdrawal of its putative reasons for refusal and the fact that it is not presenting evidence in respect of this appeal **demonstrates that Preston City Council does not object to this site coming forward for a higher quantum of development than the 90 dwellings currently proposed.**

5.3 It is clear from Ribble Valley’s updated evidence that the Council should plan to deliver **a minimum of 280 dpa to meet the borough’s full objectively assessed housing needs.** The Council has not planned to meet these needs or evidenced the significant and demonstrable harm that would outweigh the benefits of doing so. Through the requirements of paragraphs 47, 158, 152 and 14 the Framework sets out a clear process that must be followed when assessing and meeting objectively assessed housing needs. Taking the requirements of the Framework into account **Gladman submits that the Council needs to revisit its proposed housing figure in order for the Core Strategy to be found sound.** In increase in the quantum of the Longridge adjustment would contribute to meeting the borough’s full objectively assessed need.

APPENDIX 1

Land at Whittingham Road – Location Plan

APPENDIX 2

Regeneris Consulting – Updated Housing Evidence Base Review

Consultation on proposed main changes to the draft Ribble Valley core strategy and local development framework evidence base: representations on behalf of Gladman Development plc

- 1.1 Ribble Valley Borough Council (RVBC) has received updated evidence on housing need in a report prepared by NLP in May 2013. Drawing on this evidence RVBC now propose a new housing requirement set in the Core Strategy of 5,000 new homes or 250 new homes per annum, which is to be met during the plan period (2008 to 2028). This is of course a welcome increase from the previous proposed housing requirement of 4,000 new homes or 200 new homes a year.
- 1.2 The latest NLP report reviews the latest evidence on housing requirements and updates the scenarios set out in its previous 2011 report. In their latest report NLP have produced three estimates of need for additional households from 2011 to 2028 that they recommend for consideration by RVBC:
- Scenario I, Revised PopGroup baseline: 220 dwellings per annum which is their estimate of the requirement based on demographic projections using a combination of the 2011-based interim CLG projections and 2011 sub-national population projection and the 2011 Census. NLP point out that this level of housing provision would not meet RVBC's stated economic aspirations as it would imply no increase in labour force locally.
 - Scenario L, ELR Job Growth: 280 dwellings per annum which is consistent with the forecast "policy off" latest jobs forecast by Oxford Economics used in the 2013 ELR. This is for growth of 1,600 jobs in the area over the 16 year period 2012 to 2028. RVBC will be using this figure as the basis for planning for employment land supply.
 - Mid-point (Revised range): NLP suggest that the Council considers an upper range figure of 250 dwellings per annum (which happens to be a mid-point between the 220 and 280 dwellings per annum figure. This scenario they say "*would also ...support some economic growth, and would deliver affordable housing to respond to (at least some of) identified local needs*".
- 1.3 NLP state that "*to ensure there is no disconnect between housing requirement and the Council's job growth aspirations... [i.e. a figure below 280 dwellings per annum] ...RVBC would need to demonstrate how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower-growth approach could give rise to*". NLP explain that more weight should be attached to this scenario than the previous employment growth scenarios in their 2011 report as it is based on a "*more up to date and robust level of employment growth*" (i.e. that contained in the more up-to-date Employment Land Review Refresh (2013).
- 1.4 It is also the case that the employment growth scenario used by NLP (1,600 new jobs 2012 to 2028) uses the lower of the ELR 2013 scenarios (the "policy off" scenario). The ELR also looks at a "policy on" employment forecasts. The "policy on" forecast assumes the

successful roll out and development of the new Enterprise Zone at Samlesbury and the creation of an additional 3,300 jobs there and in the supply chain, or a total rise of 4,900 jobs by 2028. Given the location of the Enterprise Zone many of the jobs there would be filled by residents of areas other than Ribble Valley; however it would definitely add to the pressure on labour supply in the Ribble Valley. The potential impact of this policy on employment scenario is yet another reason why we consider that the Council should be planning on the basis of at the very least 280 dwellings per annum.

- 1.5 Other recent work looking at the housing needs of Ribble Valley has concluded that a figure of 300 dwellings a year would be an appropriate basis for planning¹. This uses the latest data and information as with the 2013 NLP work, but makes slightly different assumptions about future employment growth.
- 1.6 We believe that it is clear that based on the “*objectively assessed need*” and NLP’s own evidence at the very least the housing requirement should be 280 dwellings per year from 2011 to 2028 (4,760), plus 600 for the first three years of the Core Strategy period (2008 to 2011), or a total of 5,360. Alternatively, based on the way RVBC have applied the advice from NLP the number would be 5,600 (280 times 20 year).
- 1.7 RVBC fail to properly use the updated evidence base at their disposal and have set out a revised housing number that still fails to meet the objectively assessed need in the Ribble Valley. They have not provided any convincing evidence that the economic harm from using the 250 a year housing requirement can be mitigated. As such the current modifications to the Core Strategy still leave a document that is unsound.

¹ See http://www.ribblevalley.gov.uk/planx_downloads/DLASN_Summary.pdf and http://www.ribblevalley.gov.uk/planx_downloads/DLASN_Proof.pdf

APPENDIX 3

Land at Whittingham Road –Comparative Ribble Valley SHLAA Analysis

Ribble Valley SHLAA Assessment

1. Purpose of the Study

1.1 In order to carry out a proper comparative assessment the development opportunities around the Key Service Centre of Longridge it is necessary to include land within the administrative boundaries of Preston City Council. The Ribble Valley Borough Council Strategic Housing Land Availability Assessment in June 2009, does not include such land, therefore this assessment compares land at Whittingham Road Longridge with the sites contained within the RVBC SHLAA.

2. Methodology

2.1 Ribble Valley Borough Council published its Strategic Housing Land Availability Assessment in June 2009, with a subsequent update in July 2013. It used a set methodology (appendix 1) to assess the residential suitability of each site. Gladman have used this methodology and applied the scoring criteria against the site at Whittingham Road:

2.2 Land North and South of Whittingham Road

WHITTINGHAM ROAD SITE ASSESSMENT			
<u>Site Details</u>			
Site Location: Land North and South of Whittingham Road		Potential Capacity: 220 dwellings & 55 C2 residential apartments with care	
Town: Longridge		Gross Area (Ha): 9.2 hectares	
Current use: Agriculture and low quality warehousing			
Neighbouring use: Residential			
Visual Prominence:			
In Operational Employment use: Yes			
Green/Brown field: Mixture of both			
Suitability	Availability	Achievability	Deliverability/Developability
Site suitable: Yes	Site Availability:	Is the site achievable: Yes	Is the site deliverable: Yes

	0-5 years	Outcome of Viability Modelling: N/A	
	Is the site available: Yes		
Suitability Comments: The site is suitable and in a highly sustainable location.			
Availability Comments: The site is available now.			
Achievability: There are no constraints to delivery.			
Sustainability Scoring Criteria			
S1. Main Development Location	5	S12. Within Conservation Area	5
S2. Previously Developed	3	S13. Impact on Listed Building/Setting	5
S3. Covered by Essential Open Space	5	S14. Impact on Scheduled Ancient Monument or Setting	5
S4. Lead to Loss of Employment Land	5	S15. In Archaeological Hazard Areas	5
S5. Car Parking at Minimum Level	5	S16. Site Contains a TPO	1
S6. Is the Majority in Green Belt	5	S17. Nature Conservation Area	5
S7. Suitable Infrastructure	5	S18. Development Adversely Impacts on Surrounding Uses	5
S8. Can Infrastructure be Adapted	5	S19. Any Bad Neighbour Land Uses	5
S9. Within Landfill Consultation Zone	5	S20. Consultation Zone for High Pressure Pipelines	5
S10. Constrained by Topography	5	S21. Mineral Safeguarding Area	5
S11. Risk of River Flooding	5	S22. Mining or Unstable Ground	5
		Final Criteria Score: 104	

2.3 The site Land North and South of Whittingham Road scored 104 out of a maximum of 110. The only areas of suitability the site did not score highly was due to the greenfield element of

the proposal, and the site contains Tree Preservation Orders. The trees with TPO status can be retained in any development, and the site also develops underused brownfield land.

2.4 In terms of suitability, the site scores significantly higher than all the included identified sites assessed within the SHLAA using the same criteria:

Site Location	SHLAA Reference	Score
Land North and South of Whittingham Road	N/A	104
Corner of Chipping Lane and Inglewhite Road	035	96
Adjacent Willows Farm, Willows Park Lane	037	98
Adjacent Dilworth House, Dilworth Lane	038	92
Land at Tan Yard, Higher Road	041	88
Chapel Hill	062	84
Agricultural land adj Alston Lodge	238	96
Empty house & barn & land, 53 Chapel Hill	240	96
Land adj Alston Lodge Residential Care Home	381	94
Land between Dilworth Land and Higher Road	382	90
Land South of Longridge (Off Preston Road)	384	94
Land North West of Junction of Chipping Lane/Inglew	385	98

2.5 The site scores significantly higher than the sites identified as 'suitable' within Longridge. Furthermore, the criteria applied do not consider the additional merits such as access to services and facilities, or the logic of the site in relation to the settlement.

2.6 With the exception of the Chapel Hill site (ref 062), the alternative sites assessed within the SHLAA as 'suitable' do not relate well as an extension to the urban fabric of Longridge. The development of the sites could potentially impact adversely on the settlement due to its openness and could set a precedent for sprawl.

2.7 The Whittingham Road site is strongly defined by Halfpenny lane, which forms a defensible boundary to the proposal. The Landscape and Visual Impact Assessment confirms the

Whittingham Road proposal will not have any significant impacts on the landscape, and does not have not have the issues of openness associated with the SHLAA sites.

2.8 Furthermore, the suitability of the site should not be considered in isolation. The site at Whittingham Road also out performs the SHLAA sites in terms of sustainability, particularly with the proximity to facilities and service provision.

SHLAA Sites



APPENDIX 4

Land at Whittingham Road – Illustrative Development Framework

ILLUSTRATIVE DEVELOPMENT FRAMEWORK- LONGRIDGE Ref: HSI.26



- Site boundary (16.41 Ha + 0.83 Ha)
- Housing Parcels (up to 420 Units)
- Office area (925 sqm/10,000 sqft)
- Residential apartments with care (55 units)
- Public Open Space: 2.55 Ha inc LEAP and trees/hedges within the space
- Opportunity for new tree planting
- Informal space inc existing hedgerows, SUDS (outside POS): 1.29 Ha
- SUDS
- Primary routes and access
- Secondary routes
- Tertiary routes
- Pedestrian/cycle linkages
- Approx line of non potable water main
- Overhead Cables
- Proposed new bus stops

