

RIBBLE VALLEY COUNCIL CORE STRATEGY

MATTER 2 – THE STRATEGY

HEARING STATEMENT BY BARTON WILLMORE LLP

ON BEHALF OF BARRATT HOMES (MANCHESTER)

Introduction

Barton Willmore is instructed by Barratt Homes (Manchester) (“Barratt Homes”) to prepare statements in response to the Schedule of Matters and Issues for the Examination of the Ribble Valley Core Strategy (“CS”), and to attend the related Hearing Sessions to provide further oral submissions.

This Statement responds to the Issues raised by the Inspector under Matter 2 – The Strategy. A further separate Statement is submitted in response to the Inspector’s Issues raised under Matter 3 – Housing and some cross-reference is made within this document to that Statement.

Overall Comments on Strategy

From the outset, we wish to make clear that Barratt Homes does not consider the CS to be sound. The policies and approach of the CS to the key issues facing the Borough over the forthcoming Plan period are neither justified, effective nor consistent with national policy. In particular, the housing strategy does not align with paragraph 157 of the NPPF.

The responses to the Inspector’s Issues contained within this Statement are within the context of Barratt Homes wider land interests within the Borough and, in particular, in the context of their land option on a deliverable site of approximately 12 hectares to the north of Longridge. Appended to this Statement is a location plan of the site.

Plan Period

Key to understanding whether the strategy and policies of the CS will be effective, and whether its evidence base is up-to-date and robust, is to have clarity on the Plan period. This is particularly important to understand whether the proposed level of housing to be delivered over the Plan period will meet the full, objectively assessed needs of the Borough and whether this combines appropriately with the economic aspirations of the Borough. The CS is headlined to cover the period 2008-

2028 and likewise Key Statement H1 sets out a baseline housing delivery target for the same period.

The NPPF (paragraph 157) states that Local Plans should preferably be drawn up over a 15 year period *and* take account of longer term requirements. For the CS to be effective, its policies should be drawn up to cover a period of at least 15 years from the date of adoption, in order to allow the strategy sufficient opportunity to deliver. On this basis, and notwithstanding our comments in relation to the soundness of the submitted CS, we contend the Plan period for the CS should be 2014-2029 as a minimum and evidence base updated accordingly. In all likelihood, the CS will not be adopted until Spring 2014 at the very earliest, and such 2029 is an appropriate end date, if not April 2030, which would enable a full reporting year.

Issues

2.1 What are the strategic, cross-boundary issues of relevance to the Plan? How does the strategy address them?

Barratt Homes Response:

Ribble Valley shares boundaries with nine local authorities – Lancaster, Craven, Wyre, Preston, South Ribble, Blackburn with Darwen, Hyndburn, Burnley and Pendle. We consider housing delivery to be a cross-boundary issue of relevance to the CS. At least five of these nine authorities are under-delivering against their annual housing target to a combined figure of over 700 dwellings per annum. This data is obtained from information supplied by the HBF, which utilises the 'What homes Where' toolkit using the CS Plan period of 2008-2028 and based on the 2008-based household projections. The HBF analysis shows the following:

Lancaster: -242 shortfall against net target of 400 dpa (adopted plan)

Craven: -135 shortfall against net target of 180 dpa (emerging plan)

Wyre: -299 shortfall against net target of 206 dpa (emerging plan)

South Ribble: -6 shortfall against net target of 417 dpa (adopted plan)

Pendle: -47 shortfall against net target of 225 dpa (emerging plan and average over plan period)

We also note that at the recent appeal Inquiry by David Wilson Homes (North West) ("DWH"), against the decision of Preston City Council to refuse planning permission for 81 dwellings at Land to the South of Whittingham Road, Whittingham, near Longridge, the City Council did not contest DWH evidence demonstrating that it did not have a 5-year supply of housing land (APP/N2345/A/13/2200445).

The CS submission and its supporting documents contain no evidence to demonstrate how this problem of under-delivery at neighbouring authorities has been taken into account in formulating the Ribble Valley Local Plan strategy. In short, it is unclear how the Council as addressed the Duty to Co-operate in this regard.

The role of Longridge in the CS is clearly of cross-boundary importance. The Council's strategy in the CS in relation to the delivery of housing at Longridge, which is a principle settlement, in a cross-boundary sense, is to remove 200 dwellings from the Longridge apportionment (which is discussed elsewhere in Barratt Homes Statements) on the basis of a 200 dwelling planning permission granted to the west of Longridge within the Preston authority area. However, the CS, instead of removing the 200 dwellings from the overall Ribble Valley requirement, which would effectively see 200 of Ribble Valley's requirements delivered in Preston, the CS instead moves the 200 homes to 'Other settlements', which has no physical relationship to Longridge and are clearly less sustainable locations. A further consideration is that the 200 dwellings should count towards Preston's needs, not Ribble Valley's needs for Longridge, in which case there is no justification for the adjustment. It is not clear what the logic is behind this proposal and how the Duty to Co-operate is played out in this proposed strategy.

We have reviewed the Council's submitted Supporting Paper in relation to the Duty to Co-operate, dated 28 October 2012. We note that there is little or evidence of co-operation with Preston City Council, particularly in relation to the issue of housing delivery in and around Longridge.

On this basis, the Council has failed in its legal Duty to Co-operate effectively in seeking to address this issue.

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

Barratt Homes Response:

Barratt Homes does not consider that the CS will deliver the homes and jobs required to meet the needs of the whole Borough and there is no evidence of the needs of adjacent authority areas being properly taken into account in formulating the CS policies on housing and economic growth. Barratt Homes Statement in response to Matter 3 deals with this issue further, but we offer the following comments.

The delivery of homes and the delivery of jobs are issues that are inextricably linked. In order to inform the number of homes to be delivered by the CS over the Plan period, the Council commissioned NLP to prepare the evidence base document *Implications of the 2011-based CLG Household Projections: Ribble Valley Housing Requirement Update* (May 2011) ("HRU"). The HRU concludes, following a remodelling using, among other things, the latest CLG household projections and the 2013 ELR, that a range of between 220 and 250 dwellings per annum should be delivered for the Ribble Valley Borough. On this basis, the CS has adopted the higher end, 250 dpa, for the CS. However, adopting this figure means that the Council would not meet its additional "job growth" needs for the Plan period, which is part of the Council's overall strategy.

The HRU states (paragraph 4.4) that the Council anticipates a level of job growth, in the Borough, to be 1,600 for the period 2012-2028, or 100 per annum, in line with the 'policy off' Employment Based Forecast position (ELR paragraph 9.14). In order to achieve this level of job growth the ELR suggests a minimum figure of 280 dpa, principally as a result of the need to combat an ageing indigenous population and a consequent reduction in the working age population. The HRU goes on to state, at paragraph 4.32, that:

"To ensure that there is no disconnect between the housing requirement and the Council's job growth aspirations, in order to justify a figure below 280 dpa, RVBC would need to demonstrate how it would mitigate or avoid adverse housing, economic and other outcomes that a lower-growth approach could give rise to."

The CS is clearly proposing to pursue a lower growth target, meaning that the aspiration of 100 jobs per annum will not be delivered. The Council has failed to demonstrate how the adverse effects of this policy are to be addressed, as highlighted as being necessary in the Council's evidence base (HRU). The failure of the CS to propose to deliver at least 280 dpa means that, according to the Council's own evidence base, the CS will not deliver the homes and jobs needed.

This shortfall, however, is only part of the picture. The HRU dismisses the economic-led scenarios in the original 2011 NLP HEaDROOM Report, leading to a requirement for as much as 559 dpa, as being "neither realistic nor desirable". Whilst it may be the case that delivering in excess of 500 dwellings per annum over the Plan period is not feasible due to certain constraints, this evidence of need should not be disregarded simply because it does not provide a desirable result. Need must be identified regardless of constraints and this approach has been supported by the Planning Inspectorate at recent appeals.

In addition to this, the 2013 ELR runs both 'Policy Off' and 'Policy On' models for an Employment Based Forecast and Labour Supply Forecast. We note that the HRU economic led scenario is 'Policy Off'. Importantly the 'Policy On' models take into account the introduction of the **Enterprise Zones**, which are explicitly supported within the CS as locations for employment development. The 'Policy On' Employment Based Forecast would see an overall jobs increase of 4,900 (326 per annum) over the Plan period and the 'Policy On' Labour Supply Forecast increases working residents by 3,000 (200 per annum). Both of these job growth figures are significantly in excess of the 1,600 figure adopted by the HRU, which does not appear to take account of the supported afforded by the CS to the Enterprise Zones. Consequently, the 1,600 jobs growth scenario represents a "low growth" scenario that is not reflective of a positively prepared Plan, and is not the Strategy that the Council is actually pursuing if the Enterprise Zones are also factored in.

It is not clear from the HRU or the ELR when the related Oxford Economics model used was last revised. Barton Willmore has obtained a very recent 'Policy Off' projection from Experian Economics (11 December 2013) which shows job growth in Ribbles Valley Borough of 230 per annum for the period 2011-2028. Given the ageing population, it is vital that the CS promotes employment growth and the housing model needed to support it to sustain and grow the local economy in accordance with the NPPF (paragraphs 14, 17, 18-20 and 156).

In addition to the failings of the HRU and CS to adopt a housing requirement that would not meet even the lower job growth scenario (280 dpa), the HRU also utilises

the 2011-based interim household projections, which we do not consider to be appropriate for Plan making, for reaching its overall conclusion on recommended housing growth (paragraph 4.31). The HRU itself correctly gives caution to the use of these projections. It is now widely accepted that these projections are interim, do not cover the full Plan period and are reflective of a period of recession. The recessionary effect has embedded itself in lower household formation rates, which will not be apparent under more favourable economic conditions in future years. The Inspector will be aware that Councils have been advised by Inspectors at the recent Lichfield and South Worcestershire Local Plan Examinations that they should not plan on the basis of the 2011 headship rates. The use of the 2011 interim rates should not, therefore, be relied upon and the evidence base reviewed given this widely accepted position. The more complete 2008 based projections therefore remain the last fully tested position and the housing requirement should be revised (upwards) accordingly.

Returning to the Inspector's questions, therefore, Barratt Homes does not believe that the CS will deliver the homes and jobs required to meet the needs of the Borough for the reasons outlined above, and is therefore unsound. Furthermore, the CS and its evidence base fails to consider the unmet housing needs to neighbouring authorities, where settlements such as Longridge, for example, can sustainably accommodate some of the shortfall experienced in Preston. A failure to take proper account of the unmet needs of neighbouring authorities also, in our opinion, renders the Plan unsound.

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

Barratt Homes Response:

Barratt Homes supports, in principle, the approach of Key Statement DS1 in concentrating the majority of new housing development in the principal settlements of Clitheroe, Longridge and Whalley. This strategy is aligned with the need to create sustainable communities and the presumption in favour of sustainable development (paragraphs 14 and 50, NPPF). Longridge in particular, according to the SA and SA Addendum Report, has the potential to grow as it has fewer

environmental constraints than other settlements. It has a good range of amenities and employment opportunities. Longridge is also an appropriate location for further employment development, as advocated in the 2013 ELR and it is recognised within the Central Lancashire Core Strategy as a Key Service Centre, signifying its cross-boundary importance and potential.

2.4 What is the justification for the settlement hierarchy proposed? What evidence/reasoning led to the identification of Clitheroe, Longridge and Whalley as the primary centres? What alternatives were considered, and why were they rejected?

Barratt Homes Response:

Clitheroe, Longridge and Whalley are the largest and most sustainable settlements in the Borough. The population of these settlements, the range of local services, employment opportunities and transport connections, together with their potential for further growth, justify their position as the primary locations for growth.

2.5 The Council's proposed modifications include adding a list of other defined settlements to Key Statement DS1. What criteria have been used to draw up this list?

Barratt Homes Response:

The CS and its evidence base provides no justification for the settlements listed as "defined settlements" under Key Statement DS1. There is no logical link between the settlements; for example, some have settlement boundaries and others do not and some are in the AONB, Green Belt and open countryside. Barratt Homes is aware of no methodology put forward by the Council to justify the list of settlements. The CS is proposing that 1,640 dwellings be delivered within these settlements, which is a considerable amount of development outside what are regarded to be the most sustainable locations. Consequently, it is essential that the implications of doing so are adequately assessed.

Despite there being no proposal in the submitted CS to identify as locations for development any settlements other than the principle settlements of Clitheroe, Longridge and Whalley, there appears to have been no sustainability appraisal of

the revision to the CS to now identify these settlements in particular for development. Indeed, the SA Addendum Report (August 2013) specifically states that no further assessment is needed on the basis of this change. We consider that the SA is deficient on this basis and the proposal to apportion such a significant number of dwellings to these settlements is clearly unsustainable. Consequently, the CS is unsound.

It is the position of Barratt Homes that there is no justification for growing lower order settlements and that development should be focused towards the highest order settlements, such as Longridge. Longridge is acknowledged as having a greater potential grow over other settlements and Barratt Homes' site at Longridge can be used to reduce the burden of unsustainable allocations in the "defined settlements".

2.6 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?

Barratt Homes Response:

Barratt Homes considers the settlement hierarchy to be appropriate in placing Clitheroe, Longridge and Whalley at top of the settlement hierarchy. They are the largest and most sustainable settlements with greatest potential to accommodate further growth to meet the Borough's development needs.

Notwithstanding our agreement to the settlement hierarchy per se, the hierarchy will only lead to the most sustainable spatial distribution of new development if the CS itself pays due regard to the economic, social and environmental benefits of distributing development in accordance with the hierarchy. In this case, the CS does not distribute development in a way that reflects the settlement hierarchy and we consider the SA process to be flawed and not supported by robust evidence.

The SA process is flawed for a number of reasons. First and foremost, the SA Addendum Report, when considering the two growth Options (Option 1 – 5000 new homes; Option 2 – 5600 new homes), states that Option 2 may require further consideration of the proportional split of development between the settlements, yet this is not stated as a potential requirement for Option 1. There is no explanation

for this conclusion or evidence to support it. It is a fact, under both Options, that a reconsideration of the proportional split to allocate a greater level of housing to Longridge would result in lesser impact on the character of the less sustainable settlements and their landscapes. Yet this option of an alternative split is not considered as way of mitigating potential adverse impacts.

Secondly, in considering both Options, the SA Addendum Report states that:

"Longridge has potential to grow as it has fewer environmental constraints than some of the other settlements and has a good range of amenities and employment opportunities. However, additional secondary school capacity would be required and given its location on the edge of the borough it is not clear whether any economic benefits of this increase in population would be realised mainly in Ribble Valley or in Preston."

On the one hand the SA acknowledges that Longridge has the potential grow on the basis of it having fewer constraints than other settlements and good access to services, yet on the other hand it penalises Longridge for two reasons. The first is a lack of secondary school capacity which need not be a bar to increased development on the basis that appropriate contributions can be sought from developers to fund additional capacity. We also consider that expanding secondary school capacity in Longridge would be a more sustainable solution that distributing a higher level of housing in smaller settlements where access to schools requires a greater level of travel. In relation to the economic benefits of developing at Longridge, there is no evidence provided in the SA to demonstrate that such benefits would not be realised in Ribble Valley, particularly if regard is paid to the infrastructure available to increase employment opportunities in Longridge (section 3.3.2, SA Addendum Report).

Finally, the SA is flawed because it fails to apportion increased benefit to the Option 2 scenario on the basis that it will increase population sufficiently to deliver an increased number of jobs in the Borough (see previous comments under 2.2).

If the above failures of the SA are addressed – i.e. the option of an alternative proportional split of housing is considered in mitigation of environmental effects, leading to increased housing in the most sustainable locations, such as Longridge, and the economic benefits of an increase in housing development are properly understood – then the settlement hierarchy proposed in the CS is capable of delivering the most sustainable spatial distribution of new development.

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

Barratt Homes Response:

Barratt Homes does not object to the broader intention to distribute development to the three principal settlements and the proposal to deliver a strategic site. However, Barratt Homes objects to the distribution of housing as proposed on the basis that there is inadequate justification for the proportional split proposed and Longridge, in particular, should be allocated a higher number of new homes in the CS.

The CS appears to be justifying the proportional split of development based on the population distribution of the principal settlements, but with one third of new dwellings proposed to be delivered in the smaller rural settlements. Population split should only be one factor of many that is taken into account when determining distribution among settlements; other considerations should include: capacity to accommodate growth; the level of employment opportunities, both existing and potential; availability of deliverable housing sites; sustainable transport options; infrastructure availability and enhancement opportunities; landscape and other environmental constraints.

Allocating a third of overall housing development to small, rural, unsustainable settlements is not an appropriate strategy and is not supported by a clear methodology and sufficient information to determine how that level of housing will be split among the various settlements. Without this further information we cannot conclude whether the distribution is appropriate and justified.

Paragraph 4.10 of the CS states that the approach to distribution:

"significantly reduces the amount of development proposed for Longridge, thus addressing the 'key weakness' raised as part of the SA options analysis."

The 'key weakness' referred to appears to be reference to the need for highway improvements at Longridge, if significant growth were proposed, and the requirement for cohesive working with the neighbouring authority leading to uncertainty over delivery (p.51, SA Report, March 2012). The latter can be addressed through the Council discharging its Duty to Co-operate more effectively, which has clearly not been done to date. With regard to the former, it is not clear whether the Council has reviewed all development options around Longridge, such

as Barratt Homes land to the north of Longridge, in order to establish what level of development, and where, can be accommodated in advance of these improvements being undertaken. In any event, recently approved Fox Land development at Longridge (200 unit) and the proposals by DWH, referred to above, are offering contributions towards highway improvements in the area. Consequently, this issue is not a barrier to releasing further land for housing.

Barratt Homes 12ha site at Longridge has the potential to deliver in the region of 450 dwellings, and the Council's SHLAA update (2013) confirms that the site is deliverable within the next five years. Consequently, it is clear that Longridge, as a sustainable settlement with acknowledged potential for growth, is capable of delivering a higher proportion of housing in order to meet the full, objectively assessed needs of the Borough.

Barratt Homes contend that the strategy of the CS to seek to direct a third of the Borough's housing to the least sustainable settlements, is entirely inappropriate, is not justified, because it is not supported to robust evidence, particularly in the SA, and will not be effective.

2.8 What is the strategy's intention in relation to the Forest of Bowland AONB? Is new development in the AONB anticipated? What is the strategic approach here, and is the Plan sufficiently clear?

Barratt Homes Response:

The inclusion of AONB settlements under Key Statement DS1 indicates that development will take place within the AONB. However, it is not clear how much, precisely where it will take place or what the impact will be. On this basis the CS is not sufficiently clear. In addition, the impact of developing within the AONB, such as within the "defined settlements" listed under Key Statement DS1, is not tested within the SA Report or Addendum Report. On this basis, the CS's approach to development within the AONB is not based on, or supported by, robust evidence.

2.9 The Key Diagram is on the last page of the Plan, and has a very low profile. To be effective, it would be much better to have it earlier on. Should it be in the development strategy section? Should it more clearly illustrate the Plan's intentions for growth?

Barratt Homes Response:

Barratt Homes agrees that the Key Diagram should be given a higher profile and the Plan's strategy for growth more effectively illustrated. In particular, the CS proposes to deliver a significant proportion of its housing need in a number of smaller settlements and these settlements, as listed in Key Statement DS1, should be identified on the diagram. This change should also involve the principal settlements being given more prominent illustration, as the main areas for growth.

2.10 How has the risk of flooding been taken into account? Has the sequential, risk based approach required by the NPPF been followed? How has this issue influenced the Plan's formulation and the spatial approach ultimately proposed?

Barratt Homes Response:

No comment.

2.11 Has the financial cost of any requirements on new development been taken into account? What evidence is there to demonstrate that such costs would not threaten the delivery of the development planned for? In short, is the Plan viable?

Barratt Homes Response:

No comment.

2.12 To deliver the strategy, is it the Council’s intention to allocate land for development in a future Local Plan document, and to identify land for other purposes (for example, to prevent development on it) on a Policies Map? Should the Core Strategy be clearer about this, and set out the commitments to be addressed?

Barratt Homes Response:

We note the Council’s intention to prepare a future Allocations DPD, but we consider that the CS should more clearly express what will be included within the DPD. In addition, should the Allocations DPD not be adopted for a number of years, the CS and its evidence base needs to demonstrate what land release mechanism will be utilised in the interim, particularly in light of the fact that the Council cannot currently demonstrate a 5-year supply of housing and the strategic site at Standen will not be delivered for some time. Without this certainty, there is a risk that much of the Borough’s housing land will not be released until the latter part of the Plan period, which is an ineffective strategy.

2.13 The monitoring framework includes few quantified targets or ‘trigger points’ for implementing contingency plans. Is it sufficiently robust? Is it sufficiently clear how progress towards delivering the strategy’s aims and objectives will be measured, and how and when any contingency plans would be triggered?

Barratt Homes Response:

RIBBLE VALLEY BOROUGH COUNCIL CORE STRATEGY

MATTER 3: HOUSING

HEARING STATEMENT BY BARTON WILLMORE LLP

ON BEHALF OF BARRATT HOMES (MANCHESTER)

Issues

3.1 As submitted, the Plan sought to deliver 4,000 new homes between 2008 and 2028. The Council proposed to increase this to 5,000.

a. What is the explanation for the proposed modification, and why is it necessary for soundness?

Barratt Homes Response:

The Local authority has sought to amend its housing requirement based on the NLP Housing Requirement Update (May 2013) 'HRU' which considers the consequences of the latest population projections. Paragraph 182 of the NPPF requires plans to be positively prepared to be found sound which requires plans to be based on the objectively assessed needs of the Borough.

As a result, Barratt considers it is necessary to amend the Core Strategy ('CS') to reflect the latest population projections and households growth and *in principle* this proposed modification is supported, although Barratt does not support the proposed housing requirement of 5,000 net additional dwellings.

b. What evidence has led to the 5,000 figure being proposed? Is this a reliable source of evidence?

Barratt Homes Response:

It is based partly on the conclusion by NLP in its HRU that a housing requirement less than 280 net additional dwellings per annum should be justified by the local authority, which it has not sought to do. In response, the local authority proposes a housing requirement of 250 net additional dwellings per annum. This issue is addressed in Barratt's response to Matter 2.

As a result, Barratt considers that the housing requirement proposed is not sound as it is not justified, effective or consistent with national policy.

c. What regard has been had to the Government's household interim projections for 2011 to 2021?

Barratt Homes Response:

The HRU assesses the implications of the 2011 based household CLG projections. This points to a housing requirement of 221 net additional dwellings per annum. However, the HRU concludes that a housing requirement below 280 net additional dwellings per annum will need to be justified by the local authority which it has not done.

In short, Barratt considers that the housing requirement should be at least 280 net additional dwellings per annum as per its own report unless it seeks to justify local circumstances why it should be less than this. This issue is addressed in Barratt's response to Matter 2.

3.2 Key Statement H1 says that the overall housing requirement will be subject to a formal review within five years of the Plan's adoption. What is meant by a 'formal review'?

Barratt Homes Response:

It is not clear what the local authority mean by a formal review. Barratt's view is that the local plan must plan for the whole of the plan period in accordance with national policy. However, in the event that the adopted plan is found to be out of date, it must be reviewed immediately. Barratt's view is that it is not necessary to commit to a timescale within which to carry out a review of the plan, the timescale for which is ambiguous in any event. The local plan should reflect the objectively assessed needs of the Borough. If it fails to do this, the plan should be reviewed as required.

3.3 The overall level of new housing delivery appears heavily reliant on the strategic housing site at Standen.

a. For the avoidance of doubt, is it the intention to allocate the Standen Site on a Policies Map through the Core Strategy? If not, why not?

Barratt Homes Response:

The local authority has identified at Section 9 of the CS that the Standen site as a 'strategic site'. It is not clear whether the local authority intends to provide further clarity on the extent through a policies map or not.

Barratt requests that the local authority provides an update on the status of the planning application at the examination and its five year housing land supply and it will comment on this as necessary.

b. Is placing such reliance on one site an appropriate approach? What certainty is there that the Standen site is deliverable and will be delivered in the plan period?

Barratt Homes Response:

Barratt's view is that the local authority is heavily reliant on this site to deliver the development strategy for the Borough and without this site, it cannot meet its housing requirement. It has concerns that the Local authority is placing overreliance on a single large site which is untested in terms of its deliverability.

There is very limited information on the site within Section 9 of the CS and in Barratt's view, given the importance of the site, it is not sound to identify the site only in principle, with little or no assessment as to its deliverability.

The Inspector will be aware that the local authority recently resolved to grant planning permission at planning committee on 12th December for development at the Standen site. However in Barratt's view, this does not demonstrate the deliverability of a site, only that the proposed development is acceptable in planning policy terms and subject to other material considerations. The site does not yet have planning permission at the time of writing and there is a substantial Section 106 agreement to be drafted and agreed between the parties. Following which, pre-commencement conditions will need to be discharged, phasing and individual reserved matters applications to be approved and further conditions to be discharged.

Paragraph 4.7 of the Core Strategy states that the site will deliver 1,040 dwellings over a 20 year period up to 2028. Barratt considers that the plan period is not long enough for the reasons set out to Matter 2 and in any event, it considers that it is unrealistic that the site will deliver all of these dwellings over this period, which is 13-14 years at best.

Barratt considers that even if two house builders were to build out across the site over the plan period up to 2028 and including a Registered Social Landlord (RSL) developer, realistically, a period of 13 years from late 2014/early 2015 will not be sufficient to build out all 1,040 dwellings. Moreover, there is also significant infrastructure in the form of a new primary school on site (potentially) and a new junction arrangement on the A59.

In addition, the development of all of these dwellings in a single, relatively small housing market area inevitably leads to questions being asked over the speed of sales particularly when these will be competing against other committed housing sites in Clitheroe. In particular, both Barratt and Taylor Wimpey are building new homes in Clitheroe on a site off Henthorn Road (270 new dwellings in total).

Consequently, Barratt considers that the ability for the site to deliver all 1,040 dwellings within the plan period must be subject to question given it will require at least 2 sales outlets selling approximately 70 dwellings over the plan period. As the site is central to the development strategy for Ribble Valley, Barratt considers that the CS cannot be effective in this regard. It must include other 'broad locations' for new development or

identify other areas within the three key settlements to ensure there is flexibility in the plan in order for the local authority to meet its housing requirement.

c. What infrastructure is necessary to deliver the Standen site? What assurances are there that the necessary infrastructure will be delivered when it is needed?

Barratt Homes Response:

There is little consideration of the infrastructure requirements of the site undertaken by the local authority as part of the evidence base to the CS. Barratt considers this is a serious flaw by the local authority in seeking to allocate this site alone to meet over 20% of its housing requirement over the plan period.

A planning application was considered at planning committee on 12th December which provides an insight into the infrastructure requirements. These include junction improvements to the A59, potentially a new school, significant landscaping and affordable housing.

The planning application was submitted in outline with all matters reserved. The comments received from the Lancashire County Council Highways Officer raises concerns over the scale of the proposed development and the impact on the highway network particularly in view of the lack of detail provided on the proposed highways works and new junction arrangements. The Highways officer also raised concerns over the single access.

Barratt's view is that the assessment made of the deliverability of the site by the local authority as part of the plan making process is not robust and must raise questions regarding the ability of the site to deliver all 1,040 dwellings within the plan period. Barratt considers that other sites should be identified to meet the housing requirement.

d. Taking account of the infrastructure and other requirements, is the Standen site financially viable? What evidence is there in this respect?

Barratt Homes Response:

The planning application has been submitted by Standen Estates which is not a house builder or developer and there must be question marks to what extent viability has been assessed at all as part of the planning application.

What is clear is that the infrastructure and Section 106 requirements are significant with respect to the development of this Site and there is a distinct lack of detail on the highways works required. More often than not it would be expected that a planning application for development of this type and on this scale would include detail consideration of the access arrangements.

Barratt considers that this is a matter for the local authority to answer ultimately.

e. Given the need for infrastructure delivery, should phasing of the Standen site be included in the Core Strategy?

Barratt Homes Response:

Barratt considers that phasing should be including within the CS with respect to the Standen site.

It is key to understanding the deliverability of the site that the plan is clear on what will be delivered and by when and what infrastructure is required to support the development at each phase.

Presently, we know that the site will require an upgraded junction but because of the lack of detail submitted in support of the planning application and carried out as part of the CS evidence base, it is not clear when this is needed and how this will be secured. There is reference to the potential requirement for a new school on site but no commitment to provide this by the applicants/site owners or whether this will be required by the local authority.

Barratt considers that it is essential that a table is provided in Section 9 at the very least which sets out clearly what infrastructure is required and at what stage to ensure that the necessary infrastructure can be met.

f. Aside from housing, what other uses are anticipated on the Standen site?

Barratt Homes Response:

The CS is unclear on the precise mix of uses in Section 9. It simply states that this will be determined in subsequent DPDs. Barratt considers that the type and quantum of development proposed within a strategic site such as this should be set out clearly in an emerging plan. Without this, there is no real defence to planning applications submitted which are broadly in accordance with the policy. However, such development may not be in accordance with the aspirations of the policy and may fail to deliver the development strategy for the Borough. The planning application submitted by Standen Estates proposes a mix of land uses, but there is no commitment to deliver these uses at this stage.

3.4 The table at paragraph 4.11 indicates the number of new homes for each of the three principal settlements on an individual basis, and gives a figure for the 'other settlements' combined.

a. Is this the spatial distribution of housing sought by the Plan?

Barratt Homes Response:

See comments on Issue 3.4c below.

b. If so, should the Plan be more robust in explaining that this is a proactive strategy and give an unambiguous commitment to delivering this distribution?

Barratt Homes Response:

See comments on Issue 3.4c below.

c. How has the proportional split between the settlements been arrived at? What justifies this distribution?

Barratt Homes Response:

This issue is also dealt with in Barratt's response to Matter 2.

Barratt considers that the spatial distribution is unclear and is not justified or effective. It is a negative 'cap based' approach which will always be out of date and will therefore lack certainty on the housing required within each settlement. The local authority does not provide any clear evidence on how this distribution of housing will be delivered.

Barratt considers that this table is not clear and is open to interpretation and that this table should set out clearly what the overall housing requirement is and the total housing requirement for each settlement. It should not seek to deduct the number of permitted dwellings as this is no firm indication of housing supply. In any event, this is subject to change and will no doubt be out of date as soon as the plan is adopted.

More importantly, there is no explanation of how the figures have been arrived at under the table for each of the settlements. Barratt objects to the proposed spatial distribution of dwellings across the Borough. There is little justification for it other than to be based on the existing population i.e. the larger the settlement, the more new houses should be built within this settlement. Barratt considers that this is not necessarily a justified approach to take when determining the spatial distribution of new housing.

Barratt considers that majority of new development should be directed towards the three key settlements in the Borough as they have the mass of shops and services to support new development. It does not consider it is necessary to dictate an effective cap on new development within each settlement which would stifle development on otherwise sustainable sites which could contribute to the local authority's housing land supply.

In short, Barratt sees no justification for the proposed split of development proposed and considers that it is not sound as presently drafted.

d. 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?

Barratt Homes Response:

The justification for the Longridge adjustment is not explained in the CS. Only with reference to the schedule of proposed main change (No. 12) are we able to decipher this. The accompanying text under the table states that this is based upon 'anticipated development in Preston Borough at Longridge.'

Barratt considers that it is inappropriate for the local authority to take this course of action with no proper reasoning and no proper consideration of the effect of adding a further 200 houses to the housing requirement of the other settlements. It appears that the local authority is suggesting that there should be a cap on housing development in Longridge, be that within Ribble Valley or Preston. This approach is not consistent with national policy which seeks to encourage house building in sustainable locations and Longridge is identified as a key service centre which has a mass of shops and services to support new development.

Barratt's site at land to the north west of the junction of Chipping Lane/Inglew (23 ha) is categorised as a deliverable site by the local authority within the 2013 SHLAA update (Site Ref 385). The local authority assesses the site as suitable, available and achievable for residential development and it seems perverse to direct new housing development away from a site such as this to other untested sites in smaller settlements which may be significantly constrained.

The intention that this portion of housing should be accommodated within other settlements, without any assessment of the effect of this and no indication on where these houses will be built, is not justified and in Barratt's view is not effective. There are serious question marks over the soundness of the CS in this regard.

e. Should the Plan be more specific about the number of new houses anticipated at each of the 'other settlements'? Is it sufficiently clear to properly steer and direct the allocation of land through the Housing and Economic DPD?

Barratt Homes Response:

Barratt is concerned that the planned 1,440 net additional dwellings for other settlements is not deliverable. Nowhere in the evidence base or in the CS is there any evidence on where these new dwellings will be built.

Barratt considers that given almost one-third of the total housing requirement is to be met by the other settlements that it should be properly assessed by the local authority to ensure that it is deliverable. In Barratt's view, it is not acceptable to wait until the CS is

adopted and then seek to allocate land which may or may not be suitable or available in order to meet the development strategy of the CS. The exercise must be carried out before the CS can be found sound.

f. Which other settlements are referred to? Have their relative sustainability credentials been taken into account?

Barratt Homes Response:

It is not clear what other settlements are being referred to implicitly, although it seems to infer that the 'defined settlements' within the table under Policy DS1 are those referred to. The Local authority should ensure that there is common terminology and this is applied throughout for the avoidance of doubt.

The sustainability credentials of these settlements has not been carried out nor is there any assessment of where the proposed new dwellings will be developed.

3.5 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?

Barratt Homes Response:

See comments to Issue 3.6 below.

3.6 In the light of paragraph 47 of the NPPF, should the buffer be 20%? Are there sufficient deliverable sites to provide a 20% buffer?

Barratt Homes Response:

Barratt considers that there should be a 20% buffer applied given the demonstrable persistent under delivery against a lower housing (NW RS) requirement over the past few years.

The local authority has produced a 'Housing Land Availability Schedule' (dated October 2013). This demonstrated that only once has the housing requirement of 161 net additional dwellings (against the NW RS target) been met in the last five years. The local authority's assessment of its housing land supply position is that factoring in the shortfall and the 20% buffer it does not have a five year housing land supply.

3.7 Is there a supply of specific, developable sites or broad locations for growth for years 6 to 10 of the Plan and beyond?

Barratt Homes Response:

No 'broad locations' are identified in the CS. The CS is heavily reliant on the delivery of almost 20% of the housing requirement from a single strategic site. Barratt's comments on this issue are set out above.

Barratt has not interrogated the identified sites within the SHLAA but given the past shortfall of completions and the fact that the Local authority does not consider it has a five year housing land supply, it is unlikely that a sufficient supply can be demonstrated. Barratt considers that given the constraints within the Borough i.e. Green Belt to the south and much of the northern and central part of the Borough within an AONB, this must be assessed now.

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

Barratt Homes Response:

In line with the comments above, Barratt has concerns over the planned amount of new housing in other settlements without any proper assessment of whether there are enough sites to accommodate the amount of development proposed. The local authority appears content to defer the assessment of sites to a subsequent DPD after the CS is adopted. Barratt's view is that this must raise concerns over the soundness of the CS.

3.9 What reliance, if any is placed on windfall sites in the housing and land supply?

Barratt Homes Response:

The local authority does not place any reliance on windfall sites to meet its housing requirement, which Barratt supports. However, Barratt has concerns that the local authority will be able to allocate all the land required to deliver its housing requirement over the plan period.

3.10 What approach does the Plan take to housing density? How does this reflect local circumstances?

Barratt Homes Response:

No comment.

3.11 What proportion of new housing planned for is expected to be on previously developed land? How does the Plan encourage the use of brownfield land?

The CS does not appear to set any targets in relation to the reuse of brownfield land. Barratt supports this position which allows for flexibility to allow the local authority to meet its housing requirement. Barratt considers that development of Greenfield site is inevitable given the nature of the Borough.

3.12 Should the expected rate of market and affordable housing deliver through the plan period be illustrated by a housing trajectory in the Plan?

Barratt Homes Response:

The production of a housing trajectory would be helpful to show completions to monitor if the local authority is meeting its housing requirement. This is of particular relevance given the Standen strategic site's prominence in it.

If the local authority does propose to introduce a housing trajectory into its CS it must ensure that it is realistic and deliverable as too often those found within Core Strategies have a very low rate of completions at the start of the plan and an unrealistic expectation of how the supply will increase later on.

This allows local authorities to 'defer' its housing requirement until later in the plan period without any clear justification. This is important given that there is a backlog of completions against a much lower housing requirement.