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**Ribble Valley  
Local Plan  
(Regulation 18)  
Consultation &  
Ribble Valley  
Sustainability  
Appraisal (2022)**

Representations on behalf of  
Hallam Land Management  
Limited

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JULY 2022

Q100391

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# 1 Introduction

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1.1 This Report sets out Representations to the following documents, on behalf of Hallam Land Management (Hallam):

1.1.1 Ribble Valley Local Plan, 2021-2038 – Strategic Issues Consultation (Regulation 18)

1.1.2 Sustainability Appraisal (2022).

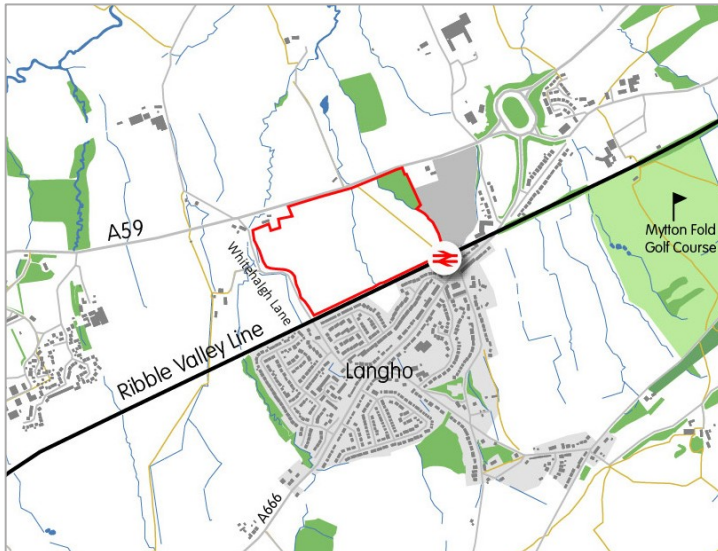
1.2 Hallam Land Management have a site-specific interest in Ribble Valley and have been engaged in the early stages of the Local Plan process through Ribble Valley Borough Council's (RVBC) Call for Sites exercise.

1.3 In 2020, and latterly in 2021, Hallam have made Representations to RVBC under the Call for Sites exercise, promoting land at Longsight Road, Langho for mixed use development, incorporating housing, employment and rail station car park.

The site being promoted is shown in Plan 1 below.

1.4 Hallam have a Planning Promotion Agreement with the landowners on this site, and the site represents a sustainable, viable and, therefore, deliverable opportunity to make a meaningful and beneficial contribution to RVBC's development needs during the Plan Period of the forthcoming Local Plan (2021 – 2038).

Table 1: Longsight Road, Langho



1.5 The future development of the site for a mix of uses as outlined above, will have a range of benefits, and contribute towards sustainable development patterns within the Borough. It has already been demonstrated that the site has the capacity to deliver the following:

1.5.1 Up to 300 dwellings, with the prospect of 90 affordable dwellings, which will make a significant contribution to the local and borough-wide housing supply.

- 1.5.2 Circa 1.6 ha of employment land, helping to meet local employment needs. Taylor Weaver have provided a note on employment need in the local area (a Note on employment demand and supply is included at **Appendix 1**),
  - 1.5.3 **Appendix 1** identifies a strong demand for development on the A59 corridor, identifying the site as being well placed to satisfy demand, and there being a limited supply of employment land/premises in Ribble Valley.
  - 1.5.4 The provision of land to deliver new car parking, and step free access to Langho Station with consequent accessibility improvements to Langho. Expansion of the resident community and the consequent benefits to improvements to the vitality and viability of services, community infrastructure and amenities within the settlement.
  - 1.5.5 Creating public access to the site and providing amenities and open space for both residents of the development and the wider community.
  - 1.5.6 Langho is a sustainable settlement with excellent access to the Borough and beyond. Expansion of Langho through the Longsight Road site will help to build on that sustainability, and will generate opportunities to improve accessibility, through passive investment in the rail infrastructure enabling the wider objectives of train access improvements being delivered by others.
- 1.6 These representations demonstrate that the site's development can make positive contributions to the following key objectives of RVBC:
- 1.6.1 Contribute to meeting both open market and affordable housing needs.
  - 1.6.2 Meeting the economic growth needs of the Borough, in an area of good commercial demand.
  - 1.6.3 General public transport improvements, building on the existing strong public transport links that exist at Langho.
- 1.7 These Representations provide an overview of the draft Plan, and relevant planning issues (Section 3) followed by an identified sound approach to the emerging Plan's Vision (Section 4), Development Strategy (Section 5), Housing Policy (Section 6), Employment Policy (Section 7) and concluding with Recommendations to ensure the Plan is sound (Section 8).
- 1.8 Section 9 considers the Sustainability Appraisal Scoping Report (March 2022).

## 2 Soundness of the Plan

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2.1 This Section of the Representations considers the strategic issues promoted in the Regulation 18 Local Plan and identifies what is considered to be a sound approach for the forthcoming Local Plan.

2.2 The consideration of whether a Plan is sound, must have regard to the following three key aspects<sup>1</sup>.

*“a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs<sup>2</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

2.3 In view of the four aspects of soundness outlined above, these representations identify a sound approach to dealing with the development needs and sustainable approach of the Local Plan.

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<sup>1</sup> Paragraph 35 of the NPPF.

<sup>2</sup> Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 61 of this Framework.

## 3 Overview

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### National Policy Context

- 3.1 RVBC have embarked on a new Local Plan, which will replace the existing Local Plan<sup>3</sup>. The new Local Plan will guide development during the Plan Period 2021-2038. Given the Plan is covering an 18 year period, it is important that it provides a strategy which seeks to meet the needs over this whole period and provides an appropriate strategy which is based upon a proportionate evidence base.
- 3.2 Quod note at this point that NPPF advises that Plans should endure for a period of 15 years from adoption<sup>4</sup> and given the high probability that this Plan will not be adopted before 2024 at the latest, the Plan period should be extended to 2040.
- 3.3 The Plan must be prepared with the objective of contributing to the achieving of sustainable development<sup>5</sup> as well as being prepared positively “...in a way that is aspirational but deliverable...”<sup>6</sup>.
- 3.4 In preparing Local Plans, they should take into account relevant market signals<sup>7</sup>. Furthermore, Local Plans are required to look ahead over a minimum 15 year period from adoption and “...anticipate and respond to long term requirements and opportunities...”<sup>8</sup>. Consequently, it is important that this Local Plan is prepared in a positive frame, objectively addresses the development needs of RVBC and responds to long term requirements. These are matters that these Representations will revert to in the following Sections.

### Spatial Context of Ribble Valley

- 3.5 The general spatial portrait of the Borough is one which is made up of a largely rural setting, with strong connectivity to the region and the main economic centres via the A59 which runs (diagonally) north east to south west through the southern part of the Borough. The A59 corridor is both a major connection as well as an “Economic Corridor”<sup>9</sup>.
- 3.6 The adopted Local Plan (Core Strategy) recognises that suitable locations along the A59 corridor have the potential to deliver economic growth. The EELR (2021) notes the strength of the A59 corridor as a business location, given its links to the rest of the Region and the national highway network<sup>10</sup>.

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<sup>3</sup> Ribble Valley Core Strategy (2008-2028), Housing and Economic Development – DPD and Longridge Neighbourhood Plan.

<sup>4</sup> Paragraph 22 of the NPPF.

<sup>5</sup> A legal requirement of Local Planning Authorities exercising their Plan-making functions (Section 39(ii) of the Planning and Compulsory Purchase Act 2004).

<sup>6</sup> Paragraph 16 of the NPPF.

<sup>7</sup> Paragraph 31 of the NPPF.

<sup>8</sup> Paragraph 22 of the NPPF.

<sup>9</sup> Ribble Valley Economic and Employment Land Needs Study (17 December 2021) (Lichfields).

<sup>10</sup> Paragraph 3.23 of the EELR.

- 3.7 Ribble Valley, despite its rural character, has a strong and diverse economy. However, with the economic attraction of areas outside the Borough, retaining the resident workforce is challenging, and there is a recognition by RVBC of a strong need to continue to promote inward investment<sup>11</sup>. There is a strong pattern of daily migration of residents outside the Borough, and redressing this through planning policy is clearly a key objective to create a sustainable development pattern within the Borough.
- 3.8 The development pattern within the Borough is made up of three principal centres (Clitheroe, Longridge and Whalley) supported by a number of smaller settlements, including Langho.
- 3.9 Development within the Borough is highly constrained due to part of the Borough being designated as Green Belt, and the high quality of its natural environment, with a substantial area (70%) of Ribble Valley being covered by AONB (Forest of Boland) as well as a multitude of other biodiversity sites.
- 3.10 Therefore, harnessing development within the existing settlement pattern, ensuring a balance of development across the settlement, especially those settlements with good levels of accessibility and connection to the A59 economic corridor are paramount to achieve sustainable development.
- 3.11 It is Hallam’s view that Langho, being on the A59, with a good accessibility rating (being on the main rail line, which is proposed to be improved – see below) and outside those parts of the Borough where the highest natural environment is to be found, renders it a highly sustainable location for future development, capable of meeting both employment and economic needs.
- 3.12 Delivering sustainable development requires transport issues to be considered in the earlier stages of Plan-making<sup>12</sup>. Notably, development should be located in areas which are, or can be, made sustainable through limiting the need to travel whilst offering a genuine choice of transport modes<sup>13</sup>.
- 3.13 In order to achieve sustainable development in transport terms, the NPPF<sup>14</sup> notes that planning policy should support an appropriate mix of uses across an area, and on “*larger scale sites*” given that they will help to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.
- 3.14 It is notable that Langho is a sustainable settlement from a transport perspective<sup>15</sup>. Being on the rail network, Langho has excellent access to Whalley and Clitheroe to the east, as well as the wider regional rail network through connections to Blackburn and Manchester. In fact, the Public Transport Position Paper (2021) notes that Langho is “*best placed to take advantage of the benefits of the rail network...*”<sup>16</sup>.

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<sup>11</sup> Paragraph 3.1.5 of the RV Local Plan 2021-2038 (Regulation 18).

<sup>12</sup> Paragraph 104 of the NPPF.

<sup>13</sup> Paragraph 105 of the NPPF.

<sup>14</sup> Paragraph 106 of the NPPF.

<sup>15</sup> Paragraph 7.2 of the Public Transport Position Paper (2021) (PTPP).

<sup>16</sup> Paragraph 5.2.9 of the PTPP 2021.

- 3.15 There are current plans to improve the rail services in the Borough, notably at Langho. This includes improved frequency and wider connectivity.
- 3.16 As part of the improvement to the rail network, there is an identified priority to improve Langho Rail Station through improved access to the station platforms and the provision of car parking. This is further identified through Lancashire County Council's bid to the Department for Transport's 'Access for All' programme, as referred to in the County Council's letter of support at **Appendix 2**. The Longsight Road site has an evident propensity to positively respond to the improvement of the rail station and this is supported by Community Rail Lancashire, Northern Trains and Lancashire County Council (see the correspondence at **Appendix 2, 3 and 4**).

## Summary

- 3.17 In view of the above, in order to deliver sustainable patterns of development, Langho is a strong candidate for meeting some of the Borough's development needs both in terms of housing and employment in a sustainable manner.

## 4 Vision

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- 4.1 Vision for the Borough established in the current Local Plan, and proposed to be carried forward (with some modifications to respond to the climate change challenges), is:

*“The Ribble Valley will be an area with an exceptional environment and quality of life for all, sustained by vital and vibrant market towns and villages acting as thriving service centres, meeting the needs of residents, business and visitors.*

*We will seek to create an area with unrivalled quality of place, respecting the unique natural, social and built heritage of the area. New development to meet the needs of the area for growth, services and quality of life will be managed to ensure the special characteristics of the area are preserved for future generations **and that opportunities to reduce carbon and mitigate the effects of climate change are embedded in the future development of the area.**” (the text in bold is the addition proposed to the adopted Planning Vision).*

- 4.2 Hallam support this Vision, and most notably:

4.2.1 Maintaining the environmental quality and quality of life, whilst

4.2.2 Meeting the needs for growth in the Borough.

- 4.3 The objectives of the emerging Plan area carried forward from the existing Local Plan and set out in paragraph 3.3.6 of the draft Local Plan. Again, Hallam support the Objectives of the Plan, and especially the following:

4.3.1 Increasing the supply of homes in the Borough, both open market and affordable, in order to meet identified needs in a sustainable manner.

4.3.2 Ensuring that local housing needs are met.

4.3.3 Improving productivity and competitiveness of the local economy, by safeguarding and promoting new employment opportunities.

- 4.4 Hallam, however, note that the Objectives relating to accessibility are specifically concerned with the improvements to address rural isolation. It is respectfully suggested that improvements to accessibility should not only address rural isolation but should be encouraged to deliver more sustainable patterns of development.

### Hallam’s Recommendations

- 4.5 Hallam, therefore, respectfully recommend that the final Objective of the Plan should read as follows, or similar:

*“Improve accessibility and service delivery to address rural isolation, **as well as to deliver the most sustainable distribution of development**” (Quod emphasis).*

## 5 Development Strategy

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- 5.1 The emerging Local Plan identifies a series of Development Strategy options (Options 1-6).
- 5.2 It notes that the existing Development Strategy (within the Core Strategy) is based on the following principles:
  - 5.2.1 Direct growth towards the main settlements, as well as
  - 5.2.2 A specific growth point (in Clitheroe),
  - 5.2.3 Strategic employment locations at the enterprise zone and Barrow.
- 5.3 The above strategy is followed, by:
  - 5.3.1 A tiered approach directing development towards the most sustainable locations in the Borough.
  - 5.3.2 Development beyond the above areas, ie, in the less sustainable locations, are controlled as is development outside the settlements and in the open countryside, and only then where they meet proven, identified local needs.
- 5.4 The range of 6 x options being considered are set out at paragraph 4.1.8 of the RVBC Local Plan 2021-2038.
- 5.5 Dealing firstly with the existing development strategy, this was clearly devised to address the specific development needs of the now adopted Local Plan (covering the Plan Period to 2028).
- 5.6 Given the new Local Plan has an extended Plan Period (to 2038) the Core Strategy's Development Strategy which was in a large part based on meeting the development needs to 2028 through a specific growth point (the Standen site at Clitheroe) and two key employment areas (the enterprise zone and Barrow) it would not be appropriate to simply continue this Development Strategy, in the case where more development needs to be accommodated (see Section 6 and 7 of these Representations).
- 5.7 Whilst Hallam do not necessarily oppose Option 1 which is a general continuation of the existing Development Strategy, there is an obvious need to modify it.
- 5.8 Option 2 of the Development Strategy is to maintain the existing strategy but identify growth opportunities in appropriate settlements and adjust the distribution of development accordingly. It is notable that this is similar to Option 4 presented in the draft Local Plan, which is to identify targeted growth at a village expansion.

- 5.9 Hallam Land support this blended Option (2 and 4), where growth opportunities should be identified for appropriate settlements, and notably at Langho where there is a clear recognition that it is sustainably located, capable of meeting development needs for both housing and commercial growth with no high environmental sensitivity, but otherwise in a corridor that is important to the economic wellbeing of the Borough and provides excellent transport connections (across all modes).
- 5.10 Moreso, Langho has the prospect of improving its accessibility through improved train access including the provision of step free access and a dedicated car park (including disabled parking). The site within Hallam's control can enhance the public transport connectivity through providing these enhanced facilities.
- 5.11 Hallam do not support Option 3 (targeting growth primarily at Clitheroe, Longridge and Whalley) given the need to meet in a balanced manner Borough-wide economic and housing needs and capitalise on existing sustainable locations elsewhere within the Borough and encourage further investment in infrastructure that will benefit other areas' social and economic wellbeing.
- 5.12 Option 5 (identifying locations for growth based on the least constraints principle) is, in part, reflected in Options 2 and 4, given that the existing development strategy is focused on building on existing settlement patterns, rather than a wider distribution into locations where development doesn't currently take place.

### **Hallam's Recommendations**

- 5.13 Hallam, therefore, respectfully recommend that the Development Strategy should continue the existing Development Strategy of the Plan, but with identified growth opportunities in appropriate settlements where development needs have been met in a sustainable manner and where they can help to deliver greater levels of sustainability.
- 5.14 Notably, Hallam consider that Langho is a settlement where further development should take place, given that it is already sustainable, is in the least environmentally sensitive part of the Borough, is on the A59 corridor and development will enhance the prospect of delivering much needed improved rail infrastructure, which can only be facilitated by land controlled by Hallam Land Management at the Longsight Road site.

## 6 Housing Policy

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### National Policy Context

- 6.1 The need to plan for housing in Local Plans is set within the overall context of Government Policy of significantly boosting the supply of homes<sup>17</sup>.
- 6.2 The NPPF notes that in order to determine the minimum number of homes needed, this could be informed by a local Housing Need Assessment, to be conducted under the Standard Method<sup>18</sup>.
- 6.3 As emphasised above, the Standard Method sets the “floor” of housing need to be provided within the Local Plan and it is for Local Planning Authorities to determine whether this minimum provision should be increased.

### Housing Need in Ribble Valley

- 6.4 RVBC commissioned Turley in 2020 to undertake a Strategic Housing and Economic Needs Assessment (April 2020) which concluded that it adopted the Standard Methodology, the Borough would need to provide only 148 dwellings per annum over the period assessed<sup>19</sup>.
- 6.5 Turley noted that planning for this low provision (which is circa 50% of the current planned delivery rate in the existing Local Plan) was not in the best planning interests of the future of the Borough, given that “...*delivery of this scale would slow recent levels of housing provision and, thereby, limit any meaningful growth of the population, leading to a fall in the number of residents in traditional working age groups (16-64) and a diminishing overall labour force that would be unlikely to support growth in the local economy*”<sup>20</sup>.
- 6.6 As such, Turley’s advice was clear that in order to maintain economic growth, a greater level of housing provision should be planned for rather than that suggested by the Standard Methodology.
- 6.7 Notably, the NPPG is clear that the Standard Methodology is only one form of assessment of housing need, and actual housing need may be different to that suggested by the Standard Methodology approach.

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<sup>17</sup> Paragraph 60 of the NPPF.

<sup>18</sup> Paragraph 61 of the NPPF.

<sup>19</sup> It is notable that the period assessed was 2018-2033, rather than the new Local Plan Period which is 2021-2038).

<sup>20</sup> Paragraph 7 of the SHENA (2020).

- 6.8 Turley went on to consider that the actual housing need in Ribble Valley is higher than the Standard Method indicates for a number of reasons, outlined in paragraph 8 of the SHENA. It is important to recognise that the NPPG suggests that in such circumstances, realistic housing requirements should be considered<sup>21</sup>.
- 6.9 Turley went on to suggest that the almost twice as many new homes per annum were actually needed (ie, 280 dwellings per annum) when compared to the Standard Methodology figure. Turley's clear advice was that in order to support the job growth potential demonstrated by baseline employment forecasts, and economic initiatives by Lancashire Enterprise Partnership and the Borough Council, up to 248 dwellings per annum should be targeted.
- 6.10 The proposed provision in the draft Local Plan of only 130 dwellings per annum is clearly contrary to achieving economic growth, and directly contradictory to the economic growth strategy that is proposed in the emerging Local Plan.
- 6.11 Furthermore, should the Plan only adopt the provision figure derived from the Standard Methodology, and given existing take up rates and supply, housing development will be largely met by existing commitments and will be taken up in the early part of the Local Plan. This will render the Local Plan in housing delivery terms, short term only.
- 6.12 Most notably, given the current build rates<sup>22</sup> which are almost three times the annual housing requirement derived from the Standard Methodology, this will lead to an unsustainable imbalance between housing delivery and economic growth, given that economic growth is projected over the entire Plan Period, (ie, to 2038). A consequence of this will be to perpetuate unsustainable outward migration of residents to other economic centres, and failure to capitalise and deliver economic growth in the long term.
- 6.13 Therefore, a balance needs to be reached in terms of housing growth, and over reliance on the Standard Methodology will not address the economic growth objectives of the Plan.

## Affordable Housing

- 6.14 Housing affordability in Ribble Valley is a constraint on persons getting access to housing in the Borough. It is the Council's corporate policy to seek to match needs with supply as, otherwise, this adversely affects the ability for residents to remain in the local area, live close to where they work, support other family members or address the workforce needs of local businesses.
- 6.15 The SHENA recognises that there is a need to deliver 88 affordable homes per annum, which suggests that the provision of new homes in the Borough going forward should be delivered at a rate of at least 292 dwellings per annum<sup>23</sup>
- 6.16 Notably, this is a similar level of housing requirement to that identified by Turley, required to meet economic needs.

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<sup>21</sup> PPG reference ID 2a-010-20190220.

<sup>22</sup> Over the past five years, the average build out rate in the Borough has been 443 dwellings.

<sup>23</sup> SHENA Section 6.

- 6.17 If the Standard Methodology is adopted in the Plan, then the affordable housing requirement (88 dpa) will represent a significant proportion of the housing target (13dpa), ie almost 70%. This will neither be market attractive, viable or achievable.
- 6.18 Consequently, adopting the Standard Methodology in its purest form, will not necessarily meet affordable housing needs, as it will serve to suppress delivery. As noted above, if the Standard Methodology is adopted, given the existing levels of commitment, there is little need for any further new sites within the Borough. Therefore, the ability to deliver new affordable housing to meet local needs will not be achieved and RVBC will not be able to meet their corporate objectives, and in turn perpetuating social inequalities within the Borough.
- 6.19 Hallam have undertaken an analysis of affordable housing completions within Ribble Valley, and over the past 13 years, affordable housing has been provided at a rate of only 71 dwellings per annum on average.
- 6.20 This is materially below the affordable housing requirement (88 dwellings per annum). Therefore, it is clear that the Council have not been meeting their affordable housing needs in the past where they have a considerable supply of sites. Furthermore, there is only a supply of 200 new affordable homes in the currently committed housing sites (ie, sites with planning permission), but their ability to deliver more during the new Plan period will, therefore, be further compounded if new sites are not brought forward in the Local Plan.
- 6.21 Given the current intentions of the Council to limit future housing provision to that derived from the Standard Methodology and, therefore, the inability to deliver affordable housing at appropriate levels to meet the identified need, the Plan will fail to meet the housing needed by different groups in the community and, therefore, be contrary to the NPPF<sup>24</sup>.
- 6.22 As outlined earlier in these Representations, development of land at Longsight Road has the propensity to deliver a level of affordable housing that would be in excess of one year's worth of need.
- 6.23 The need for affordable housing clearly supports a review of the RVBC's proposals to underpin the Local Plan with the Standard Methodology output, with no recognition of the broader benefits of delivering on a higher target.

### Hallam's Recommendations

- 6.24 Hallam recommend that the housing provision of the Plan is increased above the Standard Methodology and would be better matched with the scale recommended by Turley of up to 292 dwellings per annum.

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<sup>24</sup> Paragraph 62 of the NPPF.

## 7 Employment Policy

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- 7.1 Ribble Valley has a strong local economy, with a broad economic base across most employment sectors. The adopted core strategy aimed to protect and build on the strong local economy.
- 7.2 As part of the evidence base for the emerging Local Plan, Lichfields were instructed by RVBC to assess economic needs and future land requirements<sup>25</sup> (the ‘Study’) which recognised the good economic growth potential of the Borough, and a need to identify sufficient employment land in order to respond to the evident shortage of readily available sites.
- 7.3 The Study recognised that there was an identified minimum requirement of 22 hectares of employment land, with a maximum supply of only 11.5 ha.
- 7.4 As a consequence, the evidence suggests a minimum requirement of 10.5 ha of new employment land.
- 7.5 The emerging Local Plan suggests that RVBC will be making new allocations to address this shortfall, as well as adopting a policy of protecting existing stock<sup>26</sup>.
- 7.6 Hallam supports the Council’s intention to make new allocations.
- 7.7 The Study, as well as the RVBC’s Economic Plan (2019-2022), recognises the importance of the A59 corridor as an area of economic growth, and it is an area of strong market demand<sup>27</sup>. This is confirmed by the Information at **Appendix 1**. This corridor is therefore earmarked as one of the main areas identified as being suitable for locating new economic development.
- 7.8 Given the spatial development strategy recommended earlier in these Representations, Langho is an appropriate location for meeting employment needs, and the availability of land at Longsight Road, directly accessed off the A59 is clearly both appropriate and suitable, as well as being attractive to the commercial market.
- 7.9 Moreso, this site offers the opportunity for ‘co-location’ of uses that are mutually sustainable and will benefit from the current (and future enhanced) public transport links, as well as help to facilitate improved access to the train station for all users (existing communities and the new community that would come forward on the Longsight Road site).

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<sup>25</sup> Ribble Valley Economic and Employment Land Needs Study (December 2021)

<sup>26</sup> Paragraph 4.4.10 of the emerging Local Plan.

<sup>27</sup> Paragraph 9.53 of the EELR.

## Hallam's Recommendations

- 7.10 Hallam support the Plan's intention to allocate new employment sites, and respectfully recommend that the site at Langho is allocated for mixed uses, which would also incorporate significant and much needed improvements to Langho train station and in particular the passive provision of land for circa 30 space car parking and step free access to Platform 1.

## 8 Recommendations on the Local Plan

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- 8.1 In view of the Representations set out in the Report, the following key recommendations are respectfully suggested by Hallam:
- 8.1.1 The Plan Period is extended to 2040 to ensure the strategic polices endure for the 15 year period post the Plan's adoption.
  - 8.1.2 The final Objective of the Plan is modified as follows "*Improve accessibility and service delivery to address rural isolation, **as well as to deliver the most sustainable distribution of development***" (Quod emphasis).
  - 8.1.3 The Development Strategy should continue the existing Development Strategy of the Plan, but with identified growth opportunities in appropriate settlements where development needs can be met in a sustainable manner and where they can help to deliver greater levels of sustainability. This is a 'blend' of Options 2 and 4 of the 6 proposed options outlined in the emerging Plan.
  - 8.1.4 Langho is identified as a settlement where further development should take place, given that it is already sustainable, is in the least environmentally sensitive part of the Borough, is on the A59 corridor and development will enhance the prospect of delivering much needed improved rail infrastructure, which can only be facilitated by the Longsight Road site.
  - 8.1.5 The housing target of the Plan is increased above the Standard Methodology and would be better matched with the scale recommended by Turley of circa 290 dwellings per annum.
  - 8.1.6 The Longsight Road site is allocated for mixed use development, including housing and employment, in view of it facilitating improved public transport facilities, making it more attractive to users and helping to meet development needs on a sustainable site in an accessible location.
- 8.2 Adopting the above approach, the Plan can be made sound having regard to the 4 tests of soundness in the NPPF, most notably in respect of being positively prepared, justified and consistent with national planning policy.

## 9 Sustainability Assessment – Observations

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- 9.1 Hallam welcome the opportunity to make representations to the Sustainability Appraisal Scoping Report (March 2022).
- 9.2 We raise no comments on the geographical, temporal, or technical scope of the SA. Furthermore, we raise no comments on the baseline information or the plans, policies and programmes that inform the process.
- 9.3 It is noted that the SA Scoping Report outlines the main sustainability of issues affecting the Borough, and most notably in relation to Hallam’s Representations to the Local Plan, the need to maintain housing delivery, in order to address the high affordability ratio that affects Ribble Valley<sup>28</sup>, as well as the need to address the current unsustainable patterns of out commuting<sup>29</sup>.
- 9.4 For the reasons already explained in these representations, it is Hallam’s view that it is imperative that the Local Plan responds appropriately to housing need in the Borough, and that sufficient employment land is identified in the forthcoming Local Plan.
- 9.5 In order to address the affordability of housing in the Borough, it is necessary to maintain a good supply of new homes, over the whole Local Plan period.
- 9.6 It is evident from the Turley work that simply responding to housing provision by adopting the Standard Methodology will not address either the economic or affordable housing needs of the Borough.
- 9.7 Furthermore, maintaining a good buffer of housing delivery (above a base need) and ensuring housing delivery comes forward throughout the Plan Period, rather than simply at the beginning of the Plan Period, will ensure that wider housing needs are met throughout the Plan and supporting infrastructure can be delivered effectively.
- 9.8 For example, delivering all housing needs early in the Plan, with employment needs being delivered over a longer period, will simply perpetuate current out commuting problems.
- 9.9 In view of the above, maintaining the delivery of all forms of housing during the Plan Period is important and we respectfully request that this is introduced as one of the SA objectives.
- 9.10 Table 5-3 of the SA Scoping Report sets out the SA Objectives and Sub-Objectives and notably sets as Objective (no 3) the need to “*improve equality and access to amenities and facilities*”. At present, the SA Scoping Report merely focuses on increasing the availability of affordable housing, whilst reducing the number of unfit homes and vacant housing. For the reasons explained in these Representations, it is important that the delivery of all tenures of housing are increased. Therefore, we request that a further Sub-Objective to Objective no 3 is set within the forthcoming SA as follows:

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<sup>28</sup> Paragraphs 4.5.1 and 4.16.2 of the SA Scoping Report.

<sup>29</sup> Paragraphs 4.7 and 5.6 of the SA Scoping Report.

*“To maintain housing delivery across all tenures during the Plan Period”.*

- 9.11 The above Sub-Objective would assist in the reduction of the median house prices to median income ratio, assist in delivering the number of affordable housing completions (given that they are mostly delivered as part of open market housing schemes), and ensuring a spread of housing delivery throughout the entire Plan Period.



## Appendix 1

### TAYLOR WEAVER NOTE ON EMPLOYMENT NEEDS



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# **Analysis of market demand from occupiers in respect to the future development of a mixed-use scheme at Longsight Road (A 59), Langho, Ribble Valley**

## **Introduction**

Established in 1999, Taylor Weaver Ltd is a local firm of commercial property Chartered Surveyors with offices in Blackburn and Chorley.

Alex Taylor BSc MRICS is a director and has over 35 years of experience in the East Lancashire commercial market.

## **Description**

The development comprises 2 separate employment sites which form part of a wider mixed -use site at Longsight Road, Langho. The main employment site measures 3.5 acres and is located close to the frontage of the A59

The second site measuring approx. 0.5 acres, is located to the rear of Langho train station, adjacent to the proposed new car park, which Hallam Land Management could facilitate via the passive provision of land as part of their wider development proposals.

Both sites are shown on the masterplan of Hallam Land Management Call for Sites Vision Document, submitted to the Councils Call for Sites September 2021, as being accessed off the A59 which offers excellent access to the Ribble Valley, East Lancashire and the national motorway network (Junction 31 M6 lies approx. 7 miles west of the subject property).

For the purposes of this report, we have ignored any issues that may affect the development of the site such as adverse ground conditions, infrastructure etc.

## **Employment**

Within the category of 'employment', there are several uses which we could foresee would be interested in the site. These uses include industrial, warehouse, trade counter, office, out of town retail, convenience store, restaurant, and leisure.

For the purposes of this report, we have limited our comments to the industrial / warehouse and trade counter markets from where the greatest demand from prospective occupiers is envisaged.

The Litchfield report (see later notes) predicts a strong growth in office-based jobs in the Ribble Valley over the next 16 years. This is not reflected in the demand for office buildings as current office rental and capital values do not support office development . This is evidenced by the lack of any office development in the Ribble Valley over the last 12 years.

## **Demand**

With over 90% of companies in the Ribble Valley employing less than 10 staff the greatest level of demand is envisaged from companies requiring industrial units measuring less than 5,000 sq ft (464 m<sup>2</sup>)

Due to the location of the sites close to the A59, interest is expected to be received from both existing companies in the Ribble Valley as well as those located in East Lancashire.

Most companies will use the buildings for light industrial purposes, as opposed to warehouse uses where closer motorway connections are usually required. Notwithstanding this, the site is located west of both Whalley and Clitheroe and has direct links, via the A59, to the M6 and therefore may attract more warehouse users than would be normally expected.

The demand would be expected from both owner occupiers and tenants alike.

From our own data base, we can confirm that the majority of enquires received for industrial space in the Ribble Valley are for units below 5,000 sq ft.

For freehold opportunities we receive strong interest from owner occupiers as well as property investors who consider industrial properties in the Ribble Valley as a safe investment. This is reflected in strong growth in both rental and capital values, particularly over the last 3 years.

In recent years there have been several industrial developments that have been successfully completed and are now showing full occupancy.

These include:

- Barrow Brook Trade Park;
- Mitton Road Trade Park;
- Fairfield Business Park;
- Twin Brooks Business Park, Clitheroe; and
- Link 59 Business Park, Clitheroe.

By way of a more recent example, 2 new units are currently under construction at Woodfield Business Centre, which is located close to the subject property, just off the A59.

The units measure 5,812 sq ft and 2,500 sq ft and are scheduled for completion in September 2022. The letting agents have confirmed that the larger unit is already under offer to an existing Ribble Valley company and that they are receiving plenty of interest in the remaining unit.

## **Supply**

The latest Local Plan for Ribble Valley is currently being prepared via an Issues and Options document and the public have been invited to submit comments by the 7<sup>th</sup> July 2022.

Previously landowners of potential commercial development sites have pushed possible commercial/ employment sites for residential use due to the higher land prices achievable. This effectively limited the number of available commercial development sites in the Ribble Valley and subsequently a shortfall of available commercial space. There is currently a great amount of frustration from potential occupiers because of the lack of available industrial space.

The main site that should be coming forward shortly for commercial development is Barrow Brook Business Park which measures approx. 7.64 ha

At this stage we are unaware exactly how this site will be developed but expect to see larger units (10,000 sq ft+) to be developed on a design and build basis for specified owner occupiers.

The subject site is much smaller than Barrow Brook Business Park and therefore lends itself for the development of smaller units (below 5,000 sq ft) where demand is greatest which is recognised by the developer and is to be accommodated in the proposed scheme .

Looking on both our own and other active local agent web sites we can confirm that there are an extremely limited number (less than 10) industrial properties currently available to buy or lease. This figure ignores those properties that are shown as 'under offer'.

## **Conclusion**

**The Ribble Valley Economic and Employment Land Needs Study** prepared in December 2021 by Lichfields for Ribble Valley Borough Council made the following comments:

*"There is a clear shortage of good quality and unconstrained employment sites.*

*The development of industrial land over the last 12 years, has averaged 2.63 ha (6.5 acres) per annum ,creating, on average, 10,537 m<sup>2</sup> ( 113,000 sq ft) of industrial space per annum.*

*Employment in Ribble Valley is expected to increase from 32,300 in 2021 to 38,369 in 2038 (6,169 increase)."*

These comments, together with our own assessment of demand, gives us confidence that the development of both these sites for employment use, as part of a wider mixed-use development at Longsight Road, Langho, will be well received from occupying companies looking to invest the Ribble Valley

A handwritten signature in black ink that reads "Alex J. Taylor". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Alex Taylor

BSc MRICS

Taylor Weaver Ltd

27<sup>th</sup> June 2022



## Appendix 2

### LETTER FROM LANCASHIRE COUNTY COUNCIL

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Adam Masters  
Senior Development Planner  
Hallam Land Management Limited  
2<sup>nd</sup> Floor  
11 Park Square East  
Leeds  
LS1 2NG

Phone: 01772 530881  
Email: [Mike.cliffe@lancashire.gov.uk](mailto:Mike.cliffe@lancashire.gov.uk)

Your ref:  
Our ref: LCC/Letters  
Date: 16<sup>th</sup> June 2022

By email only: [amasters@hallamland.co.uk](mailto:amasters@hallamland.co.uk)

Dear Adam

**Ribble Valley Borough Council Local Plan: Land at Longsight Road, Langho**

I write in relation to the Hallam Land Management proposals for Land at Longsight Road, Langho, which are being considered as part of the progression of Ribble Valley Borough Council's Local Plan.

The Ribble Valley Line, since the reintroduction of passenger services in 1994, gives residents direct rail connectivity to the labour markets and social destinations of East Lancashire and Greater Manchester, in addition to providing essential local public transport to and from education and local facilities within the Ribble Valley.

Langho is one of four stations in the Ribble Valley and has been classified as a "Category C" station, with stepped access to both Manchester and Clitheroe bound platforms from street level. The stations on the line were constructed when access requirements were different from what they are today and at Langho there is no level access to platforms and between platforms. 45,706 passengers used the station in 2019/20, with passenger numbers steadily increasing over the preceding decade.

Demand for commuting and leisure rail travel has come back strongly in Lancashire in 2022, and it is important that the scene is set to enable the future growth of the rail market between Ribble Valley and Greater Manchester.

Lancashire County Council, as the Local Transport Authority, recognises the need for improvements at Langho Station and has supported the submission of a recent (April 2022) Access for All bid to the Department for Transport via Northern Trains. The Option Selection Report accompanying the bid includes a range of options for level platform to platform access and improved parking facilities, which will require the release of third party land as part of Hallam Land's development proposals.

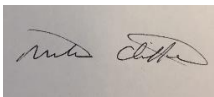
Should the associated residential development be deemed appropriate by Ribble Valley Borough Council, we would like to take the opportunity to work with Hallam Land

Management Limited to continue to develop proposals for improved station access and associated parking facilities as part of the housing provision in order to provide:

- Level and direct access between platforms which will bring station facilities so much closer for all rail passengers
- A significantly improved and inclusive travelling experience for all passengers but especially those with physical disabilities who currently struggle with stepped access arrangements
- A better experience for leisure travellers especially those passengers with luggage, prams and small children
- A scene set for further demand for rail services directly linking this part of East Lancashire with Greater Manchester and beyond
- A delivery route for local and national policy objectives to decarbonise transport networks, provide a high-quality alternative to travel by car, leading to better local air quality, reduced congestion and lower carbon emissions

If you require any further information do not hesitate to contact me.

Yours sincerely

A rectangular box containing a handwritten signature in black ink, which appears to read 'Mike Cliffe'.

Mike Cliffe BA (HONS) MA CMILT  
Rail Development Manager



## Appendix 3

### LETTER FROM COMMUNITY RAIL LANCASHIRE

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Richard Watts  
Community Rail Lancashire Ltd  
Accrington Railway Station  
Eagle Street  
Accrington  
BB5 1LJ  
19<sup>th</sup> June 2022

Hallam Land Management Ltd  
2<sup>nd</sup> Floor  
11 Park Square East  
Leeds  
LS1 2NG

FAO: Adam Masters, Senior Development Planner

Dear Sir

## **LANGHO STATION – DEVELOPMENT OF A PARK AND RIDE**

Community Rail Lancashire (CRL) commissioned a study from Seed Architects in 2020 to look at how access to and within Langho station could be improved. One of the reasons for commissioning the study was the need to provide additional car parking at the station to meet growing demand for commuting and leisure travel.

The study concluded that the most suitable location for additional car parking and improved access to the station was on land to the north of the station that is controlled by Hallam Land Management.

CRL has discussed the study with Hallam Land Management who has shown a keen interest in facilitating improvements to Langho railway station as part of its development proposals for the site. This includes the provision of an approximately 30 space car park and better access to the station platforms through the passive provision of land to facilitate the provision of step free access at the station by a third party as part of its development proposal for the site. These will, in CRL's view, help to make the proposed housing development more sustainable as well as providing wider benefits to the local community.

Improvements to Langho railway station also supports a key objective of both CRL and the Clitheroe Line Community Rail Partnership to develop and improve the Clitheroe to Manchester line. In particular, both organisations would like to see the service between Blackburn and Clitheroe improved to a half hourly all-day service. To take this forward CRL is considering commissioning Northern to carry out an initial feasibility study to look at this forward.

If approval is granted to develop the land to the north of Langho station for additional housing then CRL welcomes the commitment shown by Hallam Land Management to ensure that improved access to the Clitheroe Line features as part of the commitment to wider sustainable transport objectives. This also ties in with the Governments objectives of additional sustainable housing and de-carbonisation.

Yours sincerely

*R. Watts*

Richard Watts  
Chair  
Community Rail Lancashire



## Appendix 4

### LETTER FROM NORTHERN RAIL

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Hallam Land Management Limited  
2<sup>nd</sup> Floor  
11 Park Square East  
Leeds  
LS1 2NG

Chris Jackson  
Regional Director  
Northern Trains Limited  
Ground Floor, Square One  
4 Travis Street  
Manchester M1 2NF

15 June 2022

[christopher.jackson@northernrailway.co.uk](mailto:christopher.jackson@northernrailway.co.uk)

Dear Sir,

### **Langho Station Accessibility Improvements**

I am writing to express the support of Northern Trains to Hallam Land Management's proposals on land at Longsight Road, Langho.

Since 1994 the Ribble Valley Line has provided towns and villages in the Ribble Valley with reliable and direct train services to Blackburn and Manchester and has played a significant part in contributing to the area's popularity as a great place to live, work and socialise.

Proposals for additional housing developments adjacent to Langho Railway Station are progressing through the Ribble Valley Local Plan Review and could increase the size of the village. Neither of the two platforms at Langho currently benefit from step free access which precludes a significant section of residents from using rail services, especially those with mobility problems, those in wheelchairs and those with young children. Langho Railway Station also has a severe lack of car parking, especially car parking for those with disabilities.

Hallam Land Management's proposals for residential led development on land to the south of the Langho Railway Station could facilitate improvements to the train station. The proximity of the station to the potential new development provides an opportunity to increase modal shift to rail resulting in increased passenger footfall and providing an opportunity to markedly improve the current station environment and accessibility, including the provision of an approximately 30 space car parking and better access to the station platforms through the passive provision of land to facilitate the provision of step free access at the station by a third party as part of Hallam's development proposals.

Furthermore, improvements to Langho Train Station also supports a key objective of Northern Trains, Community Rail Lancashire and the Clitheroe Line Community Rail Partnership to develop and improve the Clitheroe to Manchester line.

[www.northernrailway.co.uk](http://www.northernrailway.co.uk)

NORTHERN TRAINS LIMITED  
ALBANY HOUSE, FLOOR 8, 94-98 PETTY FRANCE, LONDON, ENGLAND SW1H 9EA  
Company No. 03076444

Northern Trains therefore offer their support and look forward to working closely with Hallam Land Management to facilitate improvements to Langho Station should Hallam's proposals for residential led development be deemed appropriate by Ribble Valley Borough Council.

Yours sincerely,



**Chris Jackson**  
Regional Director

[www.northernrailway.co.uk](http://www.northernrailway.co.uk)

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Quod

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# Tim Waring

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