

Examination of the Ribble Valley Core Strategy

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Dear Mr Hirst

Examination of the Ribble Valley Core Strategy

Further to closing the Hearing sessions last week, I have now had the opportunity to give close consideration to the evidence and points raised. I have reached the firm view that further modifications are necessary for soundness, in addition to those previously discussed.

Overall level of housing

The *Housing Requirement Update* by NLP ('the Update') [Post 5.8] aims to provide the objective assessment of housing need. It considers a number of scenarios and gives an annual average dwelling requirement for each. These assessments are clearly as objective as one can realistically expect.

Section 4 of the Update discusses other factors which have a bearing. Paragraph 4.19 refers to the NPPF, which makes it clear that *"every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth"*. On this basis, paragraph 4.20 of the Update says *"it is important that the identified level of economic growth aspired to in the emerging Ribble Valley Local Plan dovetails with the level of housing provision therein"*.

In the case of this Core Strategy, I agree that housing and economic growth should 'dovetail'. For this to genuinely occur, from the Update's objective assessment, an annual average of 280 dwellings per annum is necessary.

Paragraph 4.22 of the Update says:

"In particular, if the Council were to pursue a figure significantly lower than 280 dpa whilst also planning for annual job growth of 100 per annum to 2028 despite an ageing population, it would need to explain how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower-growth approach would give rise to. It would also need to evidence how the adverse impacts of meeting housing needs, would 'significantly and demonstrably outweigh the benefits' [The Framework, para 14] as well as make provision, through the duty-to-cooperate, for those needs to be met in full elsewhere within the housing market area."

I concur. But as I see it, 250 dwellings per annum is significantly less than 280. The significance is that it would only, as the Update's paragraph 4.25 puts it, "*meet the majority of national policy objectives ... and the majority of economic needs*". To put it another way, neither the NPPF nor the economic needs of the borough would be fully met.

I note the points about 'clawing back' out-commuting for employment purposes, increasing economic activity in the borough and providing affordable homes for those with a connection to the Ribble Valley. However, there is little to substantiate the argument that these measures would adequately "*mitigate or avoid the adverse housing, economic and other outcomes that a lower-growth approach would give rise to*". I am not persuaded that they would. In addition, in this regard I am particularly mindful of Ribble Valley's ageing population and the implications of this for housing provision.

Furthermore, there is no clear evidential basis that "*the adverse impacts of meeting housing needs would significantly and demonstrably outweigh the benefits*". The Sustainability Appraisal Addendum Report by Hyder Consulting (UK) Ltd (the SA) [Post 5.16] appraises both the 250 and 280 options. At the Hearing, Mr Hord of Hyder Consulting confirmed that the SA indicates little difference between the two options. Indeed, from my reading of it, the SA shows that 280 dwellings per annum would have only a marginally greater impact in terms of two objectives, being protecting and enhancing landscape and townscape character and quality, and promoting the use of more sustainable modes of transport. In this context, the additional adverse impacts of planning for 280 dwellings per annum are not sufficient to justify the 250 proposed by the Council. Even if they were, it would be necessary for the shortfall to be provided elsewhere, in a neighbouring district.

Overall, it seems to me that the Council has opted for a 'hybrid' option which has no clear or fully objective analysis to validate it. While there must be room for pragmatism in plan making, this cannot be at the expense of meeting objectively assessed needs, particularly in relation to housing. As you are aware, the Government's clear aim is to "*boost significantly the supply of housing*" (NPPF paragraph 47). In the context of this, the Core Strategy's economic objectives and the Council's own evidence of housing requirements, the 'hybrid' option falls short of meeting needs and is not a sound basis for the plan. Consequently, a main modification increasing the level of housing growth to an annual average of at least 280 is necessary for soundness.

The settlement hierarchy/spatial distribution of housing

Between them, Key Statement DS1 and the table at paragraph 4.11 of the Core Strategy set out the settlement hierarchy and spatial distribution of housing. The second tier of the hierarchy includes 32 villages. With the modifications you have already put forward and from your figures, the Core Strategy indicates that 1440 new homes will be provided across these villages during the plan period. The residual figure is 732.

The problem here is twofold. Firstly, I can see little justification for grouping these villages together. They vary greatly in terms of size, the level of facilities and services they have and their accessibility. At the Hearing, it was accepted by the Council that some of these villages are clearly more sustainable than others. From all the evidence, points made at the Hearing and from my visits, I consider their sustainability credentials to be wide ranging.

Moreover, the Core Strategy leaves one guessing about how the 732 homes apportioned to this tier might be distributed among the villages. I note the Council's

point that this will be resolved through the forthcoming land allocations document. But it is the role of the Core Strategy to tackle strategic spatial issues of this kind. At present, the Core Strategy is insufficiently clear for local residents, Council officers drawing up the land allocations document and those seeking to bring developments forward. In short, it is not adequately effective in this regard.

To address all this, a main modification is necessary. This should include a more refined differentiation between the villages in the second tier on the basis of their sustainability, capacity to accept growth and any other pertinent factors. It should also identify the level of new housing anticipated in a more finely grained manner. Allocating specific figures to each of the individual villages would be the ideal situation. However, it might be that you can conceive of other justifiable and effective solutions. Much may depend on the modified hierarchy and how you propose to single out or group the villages. Given this, for the time being at least, I keep an open mind about the precise level of detail needed.

Finally, I do not consider that the re-allocation of 200 homes through the 'Longridge adjustment' to the second tier villages is justified. Taking account of their varying sustainability credentials, I am of the firm view that this figure should be re-distributed amongst the more sustainable settlements. The most obvious options to consider are the principal settlements and the most sustainable of the villages presently in the second tier. It is necessary for soundness to modify the plan in this respect.

The way forward

I now ask that you consider the content of this letter. While I recognise you will be disappointed, you will also understand that I can only support the plan if I am satisfied that it is sound. Unfortunately, as it stands at present, I am not persuaded that it is sound in the above respects. I should say that this is not to imply any guarantee that no other modifications will be needed. Naturally, I reserve my position in this regard until the examination process is complete.

I appreciate that the points I have raised here may well lead to the need for additional work to be undertaken. With this in mind, I ask that you draw up an outline of the main tasks associated with addressing the points raised in this letter along with the additional work arising from the discussions at the Hearings, including the timescales involved with each. This is to assist me, the Council and all other interested parties in the likely timing of consultation on the modifications proposed to the plan. I would be grateful to receive this document at the earliest opportunity.

In the spirit of assistance, I am happy to answer any questions you may have in relation to procedural issues. I will do all I can to help the Council in relation to the way forward, although you will appreciate the restricted nature of my role in this regard and that any advice given is without prejudice.

Yours sincerely,

Simon Berkeley

Inspector