

**RIBBLE VALLEY LOCAL PLAN REVIEW
2021 – 2038**

**REGULATION 18
STRATEGIC ISSUES CONSULTATION**

**Planning & Development Committee
12th May 2022**

A NEW LOCAL PLAN FOR RIBBLE VALLEY



**Ribble Valley
Borough Council**

www.ribblevalley.gov.uk

RIBBLE VALLEY LOCAL PLAN

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INTRODUCTION AND CONTEXT

What is the local plan and its process?

Successive Governments have operated an approach of a planning system led by clear development plans that set out, at the local level to guide planning and investment decisions for an area. In this way services and facilities can be planned, local people and service providers have a greater understanding of what is likely to take place in their area and business can make informed investment decisions.

At this point, it is worth noting that whilst there may be some subtle variations in many regards the term Local Plan and Development Plan are interchangeable. You may also see reference to the Local Development Framework (LDF). The term LDF simply describes the collective of documents previously prepared under National guidance to provide relevant planning policy both Strategic (typically where and how much) and Non-strategic (more detailed policies for deciding planning applications) as well as other associated guidance and process management documents.

The system of plan making provides the opportunity for those interested to participate in forming and influencing the plans. There are a number of stages set out in the planning legislation where people are able to take part and this consultation is one of the earliest points at which local people are able to make their views known.

The process is set out in relevant legislation and at the National level the Government provides direction to planning policies through the National Planning Policy Framework (NPPF) and the National Planning Policy Guidance (NPPG). Local Planning Authorities (LPA) such as Ribble Valley Borough Council (RVBC) need to ensure that the local plans they produce are in line with National Policy which includes guidance on how the LPA should formulate their plans and what matters can be included.

The stages of plan making are set out below and the process includes many opportunities to take part, express views and make representations. The Council must follow the regulations set out in law when creating a plan and has to demonstrate that it has prepared any plan in line with the National policy.

The process does take time, culminating in an Examination in Public where a Planning Inspector appointed by the Secretary of State scrutinizes the plan and relevant issues raised and will determine if the plan can be adopted by the council as the development plan for the area.

Once adopted it will replace existing plans, bringing planning policies up to date and them being used to inform decisions on planning applications. In areas where there are Neighbourhood Plans in place prepared by the local community, these plans will need to be reviewed to ensure they continue to be consistent with any new local plan for the area and there may need to be a separate process undertaken to ENSURE the Neighbourhood plan aligns with the new local plan. This work can of course be done in parallel by the responsible Neighbourhood planning body and would be subject to separate consultation and publicity requirements.

KEY PLAN MAKING STAGES

The planning legislation sets out a number of key statutory stages for creating and putting in place a plan. For ease these stages tend to be referenced by the regulatory stage and this is reflected in the Councils Local Development Scheme (LDS) produced by the council to let people know the intended timetable for creating its plan. The LDS current LDS can be viewed on the council's website with the following link: <https://www.ribblevalley.gov.uk/downloads/file/1797/local-development-scheme-2021>

REGULATION 18

Is the earliest stage of plan making where the LPA builds its evidence upon which the plan will be based, gathers views on the key issues and matters the plan should deal with and to explore reasonable alternatives for development in the area. It also provides an opportunity for those interested to identify concerns and suggest proposed development to be considered in forming the plan.

The material generated in this stage is used to prepare the plan that the LPA considers is the most appropriate for the area, taking account of what has been raised. Having carefully considered the submissions the LPA will prepare a preferred plan which is the councils view of the most appropriate plan going forward.

REGULATION 19

Having prepared a preferred plan, the process moves to the next statutory stage where the plan is consulted on. This is an important stage because the representations made at this point are submitted to the Inspector as part of the Examination process. The Inspector will have the representations available to him when the matters to be Examined are identified and the Inspector may wish to explore in more detail some of the issues raised. Representations made at this stage also give the right to make further submissions in response to the Examination and potentially an invite to appear and take part in the Examination with the Inspector.

REGULATION 22

On completion of the Regulation 19 stage and subject to any further consideration by the council and the need for further consultation rounds this stage is the point at which the Council having agreed to submit the plan as its proposed plan for the area sends the plan and all relevant supporting documents to Secretary of State who will then appoint an Inspector to Examine the council's plan.

Once the Inspector has completed the Examination and issued their findings in a report to the Council, if the plan is found acceptable (including any amendments) there is a process under this regulation to move the plan forward through the legal steps required to formally adopt the plan and it will become the new local plan for the area.

The Existing Development Plan for Ribble Valley

In line with previous guidance the council's planning policies are contained within The Local Development Framework which sets the policy framework.

The Ribble Valley Borough Council Local Development Framework (LDF) comprises the following:

- Core Strategy 2008-2028 A Local Plan for Ribble Valley
- Ribble Valley Proposal's Map
- Housing and Economic Development – Development Plan Document
- Longridge Neighbourhood Plan, 2028

Other Development Framework Documents:

- Statement of Community Involvement
- Authority Monitoring Reports
- Local Development Scheme

The above collection of documents effectively completed the necessary LDF for the area. Recent changes to National Guidance and the need to undertake 5 yearly reviews of adopted plans means that the the Council is intending to move from the LDF to a Local Plan. It will be a different approach to how the council's planning policies are presented but is an opportunity to bring policy together in a single, up to date local plan for the area where all relevant policies can be brought together and can be reviewed together in a consistent and comprehensive manner going forward.

The process was commenced with a review of the Core Strategy which identified a number of policies that needed updating and some policy gaps where national policy had changed since that plan was formulated. There were also some policies that were judged to need refinement in the light of experience from using the policies since the plan was formally adopted. This review was undertaken in response to a change in government requirements that meant all plans had to be subject to review every 5 years from adoption, where changes are identified to be necessary this triggers the plan making process to ensure plans are being kept up to date.

If you want to read further information about the review that was undertaken, you can access the relevant report using the link here:

<https://www.ribblevalley.gov.uk/download/meetings/id/7475/Agenda%2520item%25208%2520-%2520Update%2520on%2520Local%2520Development%2520Pla>

Unfortunately progress on the local plan has been severely impacted by the ongoing pandemic. However, the council wishes to move forward to establish an up-to-date local plan for the borough and recognizes that there are a number of circumstances that have changed since the first Core Strategy was put in place. National policy has changed, development pressures have changed and the drive for responding to Climate Change has become a much greater priority.

What is important to recognize is that the preparation of the new local plan does not mean that the documents listed above are no longer the relevant decision-making tools. The policies contained in them remain in place, albeit where there are relevant national changes to policy those changes may

need to be taken into account as a “material consideration”. The starting point for decisions remains in law as the adopted development plan.

OUR APPROACH

As indicated at the start, bringing a new plan to fruition will take time and has a series of steps to go through. Investing in the process means that the right plan is put in place. A plan that people have had the opportunity to help shape and that addresses the key issues for today’s community balanced with the many pressures that an area like the Ribble Valley has to address.

Local plans have to be prepared in a positive way, ensuring that the development needs of the area are properly planned for and that their approach ensures sustainable development that can mitigate for the effects of climate change. Local Plans are not about stopping development happening. Their role is to ensure the right development happens in the right place at the right time, in a coordinated manner. This is the starting point for that journey and one that we hope that you will take part in.

In undertaking this review the council has sought to identify the key areas for which our evidence base needed to be updated and further information is contained in this consultation document about this. This has helped us form what we view as the initial key areas that must be addressed in a new plan. However, we do recognize that there may be issues that maybe identified or people consider that further evidence should be gathered. This consultation is an opportunity to raise those concerns, identify evidence gaps to be considered or propose areas of planning policy that should be addressed further.

In this document we will start to set out how the plan is likely to look by testing alternative approaches or confirming where we consider that existing policy is still relevant and can be rolled forward into the next iteration of our planning policy for the area.

Our review has identified that some areas of policy remain relevant and we will be proposing that these policies are rolled forward as appropriate. At this stage we are also proposing that the key plan vision and objectives remain relevant and will be retained albeit with some minor refresh to reflect current circumstances. Similarly, where policy content is currently set out in the more recently adopted Housing and Economic Development, Development Plan Document (HED DPD) adopted in 2019 this policy content, including allocations will be incorporated into the new local plan. This is important as allocations in the HED DPD remain part of the adopted plan. Whilst they can be revisited in the new local plan that process in itself does not void those allocations and policies.

It is important to recognize that the approaches set out in this document are for consultation purposes only. They have been formulated based on the evidence base work undertaken so far and the policy review and in that regard are only potential approaches. They do not represent policy or new allocations and are not endorsed by the Council for anything other than consultation purposes.

TESTING THE PLAN AND ITS PROCESS AGAINST ENVIRONMENTAL CONSIDERATIONS

To help inform the plan and to meet accompanying regulations the council has had consultants prepare a Sustainability Appraisal scoping report. This has been subject to consultation with the statutory bodies whose comments have been considered and taken into account in preparing the final version of the scoping report.

The scoping report is available to view on the council's website <https://www.ribblevalley.gov.uk/downloads/download/474/sustainability-appraisal---scoping-report> and has been published alongside this Regulation 18 consultation document. Comments are also invited on the scoping report which forms an important part of the checks and balance approach to the plan making process and which will work in parallel to it.

The SA process is governed by its own regulations and statutory provisions and is intended to help ensure the plan meets the objective of delivering sustainable development which is core function of the local plan. There are separate guidance notes in relation to comments on the SA.

Regulations also require a Strategic Environmental Assessment (SEA) where there may be a risk of substantial environmental effects. Given the nature of the local area and the wide variety of issues that the plan will address it is anticipated that this will be the case for Ribble Valley. In effect this process can be combined into the SA work and delivered in conjunction with that work but it should be noted how the council intends to satisfy that area of policy testing.

As the plan develops over its next stages it is also often appropriate to hold further detailed consultation and workshop events that inform the testing of options and ultimately the plans proposals that are formulated to become the plan submitted to the Secretary of State.

Similarly, there will also be a requirement to undertake screening for what is known as Appropriate Assessment (AA). This is necessary when the plan being prepared although not directly related to the management of or connected to any areas of designated habitats (such as Sites of Scientific Interest SSSI, Special Protection Areas (SPA) and similar national and International designated habitats) of which there are a number in Ribble Valley. The AA process considers if there are any implications for the designated site from proposals in the plan in view of the site's conservation objectives. This too will be undertaken simultaneously with the SA and SEA work and will be published for comment at relevant future stages of plan making.

EXTERNAL TESTING

Throughout the process the differing stages of plan making are tested through public consultation. This provides regular opportunity, a wide variety of local and national organisations; the public; business interests; land-owners and the development industry to contribute to the plan and to challenge what is being proposed. These consultations are documented and form an important part of the material that is submitted to the Inspector appointed by the Secretary of State to scrutinize the plan. At Regulation 19 and subsequent consultation stages representations are also provided to the Inspector as part of the submitted evidence.

The council will document how the plan has evolved and how it has responded to issues raised in order to demonstrate that it has taken a “sound” approach to preparing the local plan.

At present it is a principle of the plan making and Examination process that the council can demonstrate to the satisfaction of the Inspector that the plan has been prepared in such a way as it can be found sound by the Inspector and recommended for adoption.

To be found “sound” the local plan should be POSITIVELY PREPARED, JUSTIFIED, EFFECTIVE and consistent with National policy.

“POSITIVELY PREPARED” means providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and takes account of any needs agreed with neighbouring authorities under the Duty to Co-operate.

“JUSTIFIED” means that the plan is:

- Founded on a robust and credible evidence base.
- Is the most appropriate strategy when considered against reasonable alternatives.

“EFFECTIVE” means that the document must be:

- Deliverable
- Flexible
- Able to be monitored

“CONSISTENT WITH NATIONAL POLICY” Means that the plan will enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

DUTY TO CO-OPERATE

An important aspect of plan making is a requirement for LPA’s to demonstrate that they have worked with neighbouring authorities or relevant infrastructure providers to address matters in a strategic

manner. There is a specific duty in legislation to co-operate which the council must demonstrate that it has satisfied the duty. This does not mean the council has to agree to another authorities' proposals but it does need to ensure that relevant factors have been considered and where appropriate accounted for in its local plan. Typically, this will relate to matters of identified need that cannot be accommodated in an authorities' area and agreements are put in place to meet those needs constructively in a neighbouring area such as housing or employment where it is appropriate and supports the delivery of sustainable development.

As part of the plan making process consultation will be undertaken with relevant authorities to establish any cross-boundary issues that need to be addressed and this will be taken into account as the local plan is formed. To date the council has worked with other authorities as they have prepared their plans and at present there has been no requirement to accommodate needs from those areas.

UNDERSTANDING THE AREA

Before we start to consider what is appropriate in terms of planning policy for the area it is important to give ourselves an insight into the nature and characteristics of the area. This helps to establish a context for the area in Spatial Planning terms (where things are and how they sit together) how that might influence aspirations for the area and what do we need to see in a detailed planning policy context to ensure the special characteristics of the area are protected. This is balanced whilst ensuring development can take place to meet the needs and requirements of the wider community.

As part of this process we look to a range of information that allows us to understand the area better including published sources council documents and a variety of reports covering more technical or specialized aspects that form our evidence base.

In this section we will explore this understanding and provide information on the key evidence base elements we have to inform the plan. As indicated, it is acknowledged that there may be evidence gaps and it is important for these to be identified in response to the consultation.

An important part of the plan-making process is ensuring that there is a good understanding of the area for which we are looking to create a forward-looking plan. To do this, we have examined a wide-ranging collection of evidence documents and other sources of information to build a picture of our borough. This informs understanding and provides a solid base which the new plan can build on.

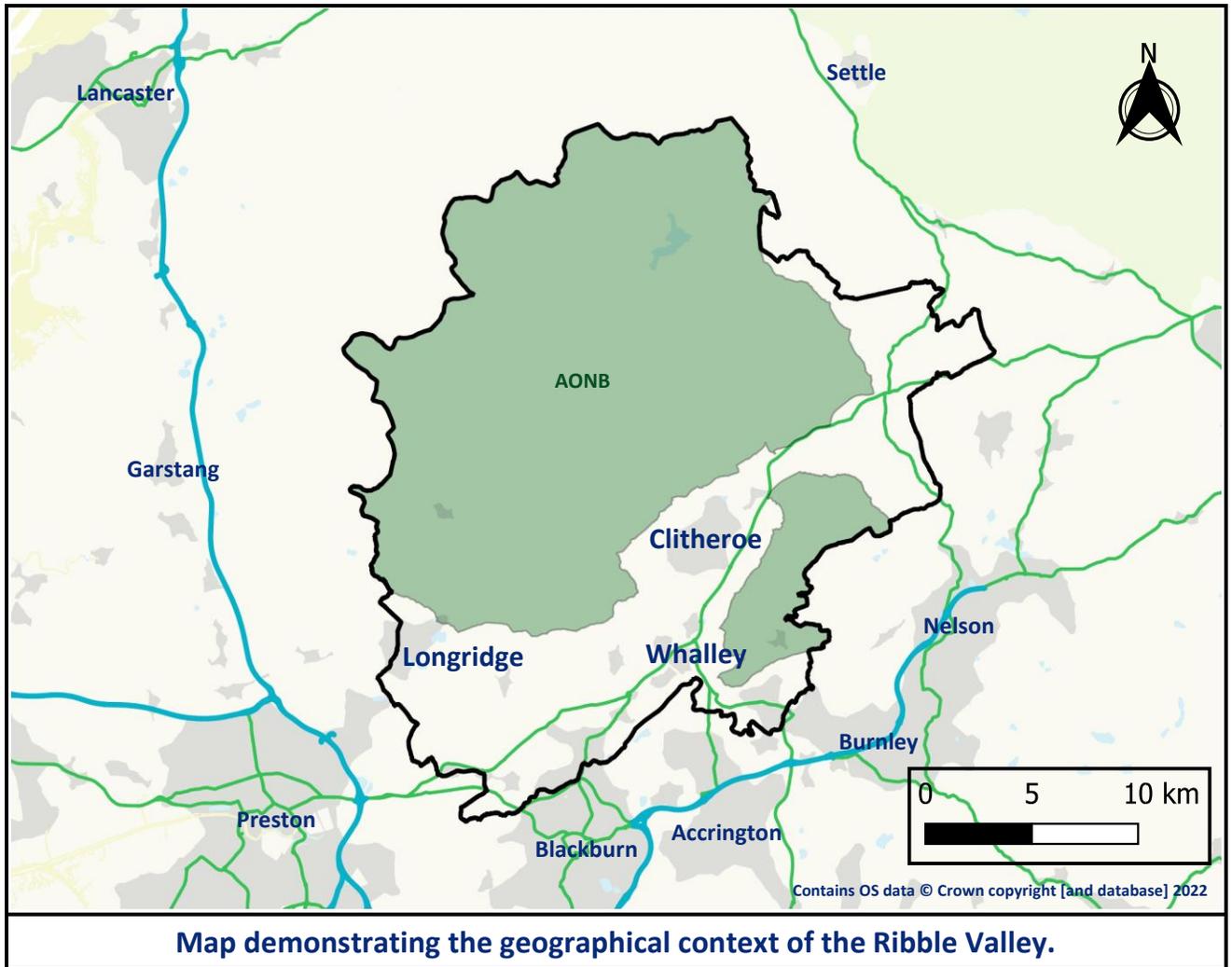
Situated in North-East Lancashire, Ribble Valley is a predominantly rural borough spanning 583 square kilometres, making it the largest district in the county. It is situated to the east of the M6 motorway and north of the M65, above the corridor of settlements including Blackburn, Accrington, and Burnley. The map shown below presents the borough in its geographical context, highlighting both its largely rural setting but good connectivity with other areas of Lancashire such as Lancaster, Preston and Blackburn, which are most often visited by residents for both work and leisure.

Despite being the largest authority in the county by geographic area, the borough is home to a population of just 62,000¹ making it the least populated within Lancashire. These characteristics and resulting densities are more akin to rural parts of Yorkshire and Cumbria, however, the borough's population has been growing at one of the fastest rates in the county in recent years². This, combined with a relatively ageing population (23% of the population aged over 65 years) presents a complex demography for whom this plan seeks to deliver for.

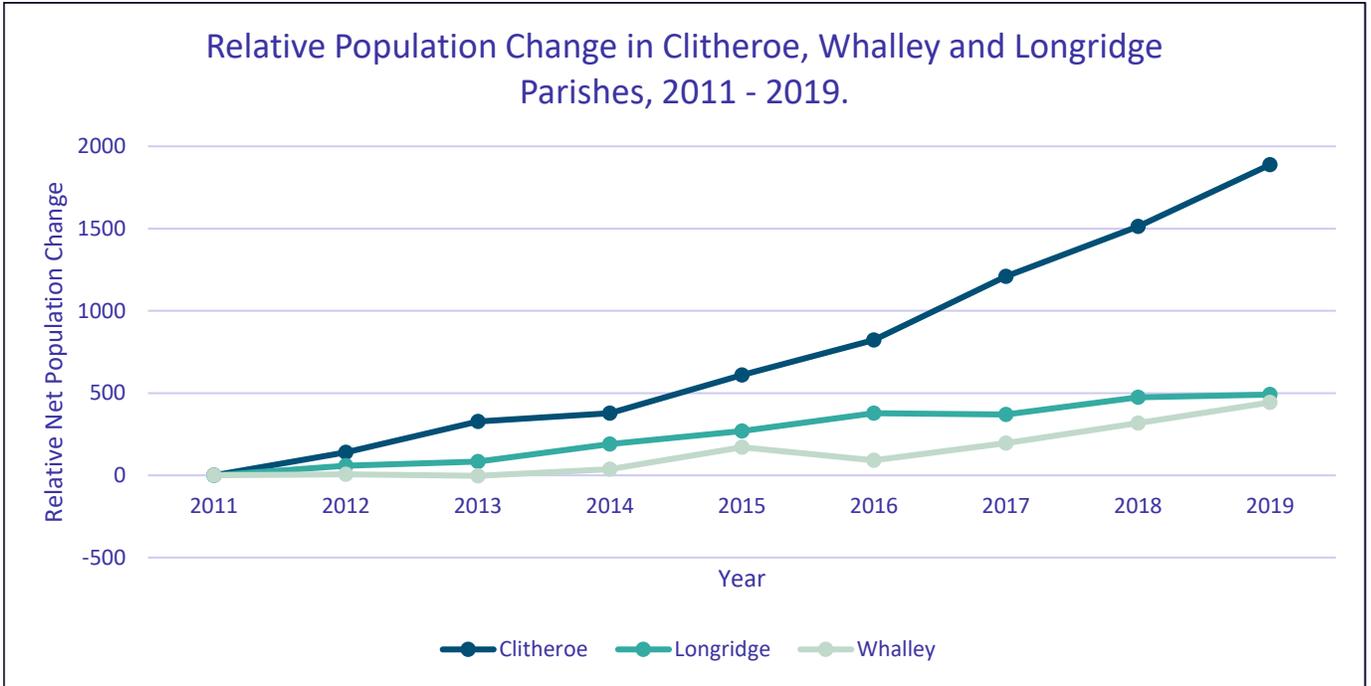
¹ ONS, 2021. 'Mid-year Population Estimates, June 2020', Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annua/midyearpopulationestimates/mid2020>

² ONS estimates for 2018-19 and 2019-20 show the population of the Ribble Valley to be growing at rates of 1.4% and 1.9% respectively, which are the highest percentage increases in the county for those years.



Within the borough, the main population and economic centers are the three principal centers of Clitheroe, Longridge and Whalley as identified in the Core Strategy. These built-up areas are the primary settlements visited within the borough for work and leisure and have evolved to be the most populated settlements. The graph below outlines the estimated growth in relative population of these three main settlements, using their 2011 Census figures as a baseline.



As the main centre within the borough, Clitheroe has a population of 16,000 and is the primary administrative, retail and service centre. This results in the town also providing employment for many within the borough. Longridge and Whalley are smaller centres, with populations estimated to be 8,200 and 4000 respectively, but they are no less important. These smaller centres act as local hubs which serve their own communities as well as wider catchment areas. These catchments are made up of much smaller villages which although picturesque, offer a level of services which sometimes may not be capable of providing for all needs. As a result, all three principal settlements act as cornerstones of local economy and community, which underlines the importance of the new Local Plan to ensure their success and health as service centres.

Despite the rural nature of the borough, the Ribble Valley maintains a strong and diverse economy which compares favorably to that of other neighbouring districts. The three principal settlements outlined above are home to many retail and SME businesses which are indicative of the creative and entrepreneurial spirit of the local economy. In addition, the borough is home to a number of larger employers within manufacturing and rural industries which are well positioned to take advantage of a skilled workforce within the Ribble Valley, which at the moment predominantly commutes out of the borough to work. Retaining this workforce and ensuring that the value of their output is realised within our borough is a continued focus through this plan, as well as continuing to promote inward investment.

The daily migration of residents outlined above is representative of the Ribble Valley's close economic relationships with the wider Lancashire region. The numerous rail and road transport links connecting the area with the rest of the Northwest provides businesses with the opportunity to widen their area of operation, as well as enabling employees to realise the benefits a broader extent of

employment opportunities. These connections are predominantly with Pennine Lancashire, the Functional Economic Market Area (FEMA) for the Ribble Valley.

Setting aside the wider connectivity of the borough, the three main service centres act as a vital component of the settlement hierarchy within the Ribble Valley, helping to provide goods and services to the population in combination with over 40 picturesque villages set within an idyllic rural landscape. Rolling hills, wooded valleys and meandering country lanes characterise an unspoilt natural environment, part of which has been designated as an Area of Outstanding National Beauty (AONB) such is its quality. The Forest of Bowland AONB covers over 70% of Ribble Valley and is complimented by a multitude of Biological Heritage Sites as well as 16 sites of Special Scientific Interest. Other natural environment assets include extensive footpath networks and over 92 Ha of formal open space.

Such is the high quality of Ribble Valley's natural environment that a range of leisure attractions utilise it to provide activities for local residents and tourists. Within the Ribble Valley there are many opportunities to walk, cycle, fish and even ski, which are in addition to various cultural events and festivals throughout the year. These include Ribble Valley Jazz Festival, Clitheroe Food Festival and the Royal Lancashire Agricultural Show, all of which attract visitors from afar. The magnificent landscape and related attractions are complimented by eye-catching boutiques, cafes, farm and village shops to provide both residents and visitors with a unique sense of place.

This results in a highly attractive place to work, live and visit, evidenced by the borough previously being cited as the happiest place in the UK³. Despite this, these qualities will only remain if they are used sustainably, and this presents a key challenge which this new Local Plan must address.

Complimentary to the quality natural environment, Ribble Valley also boasts a high-quality built environment and heritage. The National Heritage List for England lists 862 entries for heritage assets within the Ribble Valley⁴ which outlines the range of important historic assets which shape our towns and villages. Clitheroe's skyline is dominated by a 12th century Norman Castle which sits atop of a Limestone Knoll; both Whalley and Sawley are home to Cistercian Abbeys and Ribchester has a Roman history, with many artefacts found held in the nearby Roman Museum.

Many other villages such as Billington and Downham are rich in history and, as a result, the borough as a whole is an attractive destination for those with relevant interests. This new Local Plan will need to ensure the longevity of these assets, so that they can be preserved for future generations.

The attractions, landscape qualities and thriving economy outlined above are what the Ribble Valley is known for, and this new Local Plan seeks to balance each of these to create a healthy and positive place for people to grow up, get on and grow old. However, this is all to be done within the global

³ <https://www.theguardian.com/uk-news/2019/oct/23/ribble-valley-officially-the-yk-happiest-place>

⁴ <https://historicengland.org.uk/listing/the-list/advanced-search-results>

context of Climate Change, which does not present a new issue but instead a renewed level of urgency, as recent events demonstrate the damage that rising carbon emissions can do to places across the world. As an area with one of the most picturesque landscapes within the United Kingdom, this plan seeks to achieve the most it can in order to protect the Ribble Valley from the consequences of Climate Change through mitigation and adaptation, concepts which are woven into every aspect of this plan.

VISION AND OBJECTIVES

Our planning vision for the area was developed through extensive community consultation and has guided the preparation of planning policy for many years. Our evidence base and monitoring continues to endorse the vision as an appropriate basis to plan for the area.

We consider that the vision remains relevant and would not propose to change it at this stage other than to introduce a need to ensure that it is clear that sustainable development has to have regard to climate change and the need to ensure effects are mitigated and carbon reduction through development is recognized. This is an opportunity to influence any aspects that you consider need to be addressed and we would welcome your comments.

Our proposed vision 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 centers, meeting the needs of residents, businesses 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.***

(Text in bold is the addition proposed to the current vision)

In forming the new plan we intend to ensure that policies will lead to the achievement of the vision by the end of the plan period. It remains ambitious and will require a very careful balance between social, economic and environmental factors. Addressing issues around Climate Change may result in some challenging decisions however it is seen as vital that our new local plan ensures decision making recognizes the importance of addressing the global implications of Climate Change.

KEY OBJECTIVES

Similarly, the objectives for our plan have been reviewed and it is proposed that the following objectives should remain at the heart of the new local plan and underpin the council's approach.

The local plan should:

- Contribute to local, regional and wider sustainable development, including addressing and mitigating against the impacts of climate change.
- Respect, protect and enhance the high-quality environment and biodiversity in the borough.

-
- To increase the supply of affordable and decent homes in the borough to help meet identified needs in a sustainable manner.
 - Ensure a suitable proportion of housing meets local needs including the types of housing delivered.
 - Improve the competitiveness and productivity of local businesses by safeguarding and promoting local employment opportunities.
 - Support existing retail business whilst improving the retail offer by ensuring the vitality and viability of the retail areas are considered.
 - Co-ordinate, innovate and diversify sustainable tourism, building on our strengths and developing new initiatives.
 - Ensure neighbourhoods are sought after locations by building cohesive communities and promoting community safety
 - Improve accessibility and service delivery to address rural isolation.

Comments are invited at this stage on the Vision and Objectives which form the basis of what the Council will set out to achieve through the new local plan, in particular the proposal to strengthen the commitment to Climate Change which although always part of the planning objectives for the area is now given greater emphasis.

LOCAL PLAN EVIDENCE BASE

The policies and wider strategic vision that are found within this plan must be based on a sound, credible and robust evidence base. This is critical to understanding the issues and matters most pertinent to the area. The authority has updated some of the key elements of the evidence base to bring it up-to-date and is continuing to add additional documents as the new Local Plan evolves.

The documents currently in place are detailed below, together with other evidence base documents which the Council expects to produce before publication stage. The evidence base is intended to evolve as issues are identified or new information becomes available and it will change as the plan making process moves forward but at this stage is intended to provide key information to commence the process and to stimulate debate.

All the documents can be viewed on the Council's web site.

Housing Land Availability Study and 5 Year Supply Statement 2021

These documents prove the existing housing supply within the Ribble Valley. These figures will be used in part to determine the housing requirement for the borough and any shortfall that may require the allocation of sites. These are updated annually.

Strategic Housing and Economic Needs Assessment (SHENA) 2020

The SHENA presents evidence on the overall housing need in Ribble Valley and the level of economic growth proposed for the borough. The assessment also separately considers how this overall need is segmented into a need for different types, sizes and tenures of housing as well as a more detailed consideration of the specific needs of individual groups in the local housing market.

Public Transport Position Paper 2021

An evidence base study outlining the current extent and status of Public Transport within the Ribble Valley. This report assesses existing policy and legislative context relevant to public transport provision, whilst also outlining the existing network within the borough. This document identifies which settlements are most connected to the public transport network and surrounding town centres.

Service Centre Health Check Assessments 2021

This report provides a review of the three main service centres (town centres) within the Borough of Ribble Valley, undertaken to assess their vitality and viability in the form of a 'health check' exercise in line with Planning Practice Guidance. The findings from this study have influenced town-centre specific policies within this plan.

Authority Monitoring Report

Published annually, the AMR uses indicators to monitor the implementation of existing policies held within the Core Strategy. These reports are highly useful as evidence base material, highlighting the performance of existing policies and influencing the revision of policies within the new plan.

Sustainability Appraisal (SA) – Scoping Report

This report represents the initial stage in the SA, in which the context and scope of the process are set. It proposes and agrees with the SEA Statutory Bodies the scope of the forthcoming SA.

Strategic Housing and Employment Land Assessment (SHELA)

The most recent assessment was undertaken in 2013 and focused upon land for housing. It demonstrated a wide-ranging supply of land that was potentially available to meet requirements for development such that the borough would be able to meet demands within its own boundaries and without having to review Green Belt boundaries. The Council expects to produce a full SHELA to indicate the existing land supply within the borough which will address both land for Housing and Employment. This will assess the suitability of sites for housing or commercial development and will include sites put forward within the Call for Sites process, which ran during September and October 2021. The Employment Land Review also contains information relative to employment land availability but the SHELA will draw the two elements together. What is clear from the call for sites is that an extensive number of sites are available to consider when looking to address requirements. The strategic importance of this is that it demonstrates that the council will not need to consider removing sites from Green Belt as alternative sites are available. Similarly, sensitive locations where key Landscape, Heritage or Conservation protections are significant in relation to potential sites are less likely to be considered for release as alternative sites are available.

Strategic Flood Risk Assessment (SFRA)

The most recent SFRA produced by the Council in 2017 summarised existing situation regarding flood-risk within the borough at the time of publication. The Council is in the early stages of producing a revised SFRA (Level One) and has begun liaising with the Environment Agency as well as the Lead Local Flood Authority, Lancashire County Council, as work is progressed.

Economic Baseline Study 2018

This Baseline Report was prepared to update the economic evidence base which underpins and informs the borough's Economic Strategy and Local Plan. The work also establishes the Functional Economic Market Area (FEMA) that is relevant to Ribble Valley to help understand how the area relates to neighbouring areas from an economic and planning viewpoint.

Ribble Valley Economic Plan 2019 – 2022

This strategy outlines the economic objectives and priority action areas for the Council to address in order to achieve the vision for the area. The local plan will provide a framework to help deliver the aspirations and actions included in the council's economic plan.

Employment Land Review (ELR) 2022

This study establishes land requirements and policy imperatives in relation to employment land classes E(g)(i) offices, E(g)(ii) R&D, E(g)(iii) light industrial, B2 and B8, other key economic matters arising from the study and provides growth options to consider with their workforce implications and associated impact on housing requirements.

ARK Report March 2022

Prepared in response to the need to understand the challenges faced by our service centres as a result of the impact of Covid 19, this report provides a review of each centre identifying a range of issues to consider to help maintain their attraction and promote their roles. The report includes a number of suggested actions to address including land use related factors that should be considered in the new local plan.

Climate Change Strategy 2021

Prepared by the council to steer its approach to the challenge of Climate Change, whilst it seeks to address a number of matters it highlights the role that the local plan and associated planning policies will have in helping mitigate the impacts of climate change.

Draft Homelessness Strategy 2022

This document is currently undergoing an update and a consultation version has been published for comments. Whilst it sets out the Council's approach to dealing with Homelessness. It provides a valuable context for how Planning can integrate with issues around Homelessness.

The above list of documents outlines key evidence documents that inform the strategic context of the local plan as it develops. Other documents contained in the evidence base will also be relevant and new material will be generated or existing evidenced updated as relevant throughout the process.

COMMENTS ON EVIDENCE BASE

As part of this consultation comments are invited on the evidence documents and in particular any additional areas of evidence you would propose the council should consider.

KEY ISSUES TO CONSIDER

As part of the review process the council needs to establish its approach to spatial strategy over the next plan period, the underlying requirements for housing including affordable housing and wider economic needs for the wellbeing of the local economy. These elements are interlinked in terms of ensuring the new local plan makes provision for the future needs of the borough. These issues are informed by key evidence pieces within the evidence base for the plan.

In the next section we set out, in summary, the key considerations and the impacts to consider in taking the new plan forward that we have drawn from our evidence base so far. This results in a number of options to consider in how development needs could be planned for. At this stage again it is important to emphasize that we are raising these for discussion and any suggested proposals have no status in planning terms.

Development Strategy Issues

Evidence Base: AMR; HLAS; ELR; SHENA

The existing development strategy contained in the Core Strategy was arrived at following extensive consultation and refinement which lead to a strategy intended to direct growth towards the main settlements, a specific growth point (The Standen Site, Clitheroe), strategic employment locations at the Enterprise Zone and Barrow on the A59 and then a tiered approach which directed development towards the more sustainable developments in the borough. Development in identified, but less sustainable settlements was controlled whilst development outside the settlement and in the open countryside were more tightly controlled essentially to facilitate the meeting of proven, identified local needs.

This approach provided the most sustainable approach to development in the borough, focusing development to those locations considered most accessible and areas with an improved access to services to support the developing community. Housing requirements were planned for against this hierarchy, distributed initially in accord with the scale of the identified settlements such that planned growth was proportionate to the relative size of the settlement which was viewed as the most appropriate means to distribute growth reflecting local communities.

There were some anomalies to this approach in so far as in parallel to progressing the Core Strategy planning applications were approved in line with government policy in relation to housing supply meaning that growth at some locations was approved outside the plan making process, including growth at Barrow, parts of Clitheroe and Longridge.

In looking at the Development Strategy as part of the local plan review, the developments that have taken place can be taken account of in formulating the new plan, but it must be recognized that the development commitments (see Housing Land Availability evidence) will reflect the strategy in the core strategy as it is now. Certainly, in the initial part of the new local plan period those commitments will continue to be delivered. Any substantive change in approach to development strategy identified

now will not be effective until later years. One thing that the plan will not be able to do now is to reverse decisions on committed sites. However, regard can be given to longer term strategic change.

At this stage it is worth remembering that there are some strategic policy designations that have a strong influence on the Development Strategy. Much of the borough is designated as Area of Outstanding National Beauty (AONB). Some 70% of the borough falls into this nationally designated protected area which constrains the extent of development that can be directed into it. Similarly, there are areas of designated Green Belt which are intended to form a long-term constraint on the development of those designated areas in order to protect openness and separation between principle urban areas. The purpose of the Green Belt is enshrined in National Policy (NPPF) and its release for development is only considered in very special circumstances. It is intended as Development Policy rather than a landscape protection policy such as the AONB. The Extent of the AONB and the designated Green belt can be seen on the proposals map in detail and is illustrated schematically on the diagram below. At the point there are no proposals to remove land from the designated green belt or to alter the established boundaries.

These key designations and the pattern of identified settlements is shown on the key diagram of the adopted Core Strategy and is included in the appendix to this report for reference.

In terms of options for the broad Spatial Development Strategy, which establishes the guiding principles where development should take place there are limited options given the key constraints identified, the desire to protect open countryside and the need to deliver “sustainable development”

Development Strategy Options

The Council proposes the following options for the Development Strategy should be considered to address identified requirements:

- 1 Retain the existing Development Strategy (as per the Core Strategy).
- 2 Retain the existing Development Strategy but identify growth opportunities in appropriate identified settlements adjusting the distribution of development accordingly.
- 3 Identify targeted growth points to accommodate the majority of new planned growth at each of the main settlements Clitheroe, Longridge and Whalley with limited development elsewhere.
4. Identify a targeted growth point as a village expansion to accommodate future requirements having regard to sustainability.
5. Identify locations for future growth based on areas with least constraints.
6. Something else?

These concepts are intended to promote debate to ensure the council can demonstrate it has looked at reasonable alternatives. There is also the opportunity for other options to be promoted at this

stage. The amount of development to take place will be dependent upon the outcome of our work on requirements but there is the opportunity to give some thought to the proportion of new development anticipated in response to other elements of this consultation document set out later in this document.

With regard to option 5, this is intended to be an approach guided by taking account of key constraints which can be mapped, leaving areas that are clear of constraint and therefore could be identified as the areas where development may be directed. It would be a starting point based upon accessibility, ecology, heritage and landscape features and principle development constraints such as the Green Belt.

We are keen to hear views on the Development Strategy and any alternatives. We would urge you to respond constructively as the council is not in a position to simply stop development. But, it can lead where and how it takes place in the future and ensure that the best possible forms of development are delivered to the benefit of the local area providing for future generations in a sustainable way and influencing how Climate Change is addressed pro-actively.

Housing Requirements

Evidence Base: SHMA; HLAS; 5 Year Statement; AMR; SHENA, Draft Homelessness Strategy

Housing development is often the key area of concern for many local communities in the planning process, whether it is based around pressures for new housing developments or a need for more affordable housing to meet demands. In Ribble Valley the attractive environment as a location to live, the need to accommodate changing household structures, new housing as a vehicle to help address the supply of affordable homes all contribute to significant development pressures that the council through its planning policy has to aim to manage. New housing is recognized by the government as a priority especially as a factor in support of economic growth and national policy is directed towards increasing the numbers of new homes delivered. New housing contributes to the local economy and is a major industry in itself as a driver of the national economy also. Attractive locations such as the Ribble Valley will remain attractive to investment and market desirability which will ensure that development pressures will continue to be experienced. In this light it is important that the council can put in place a robust local plan that allows these pressures to be managed and through the local plan process for the community to have the opportunity to shape the area they live in.

As identified previously our existing Core Strategy established housing requirements for the period 2008 to 2028 (the plan period). This adopted requirement was established as a minimum requirement of 280 dwellings per year. Having initially spent some time catching up on under delivery from previous years, the borough has seen in the last few years a high rate of delivery with a pandemic related dip in the last year as illustrated in the diagram below.

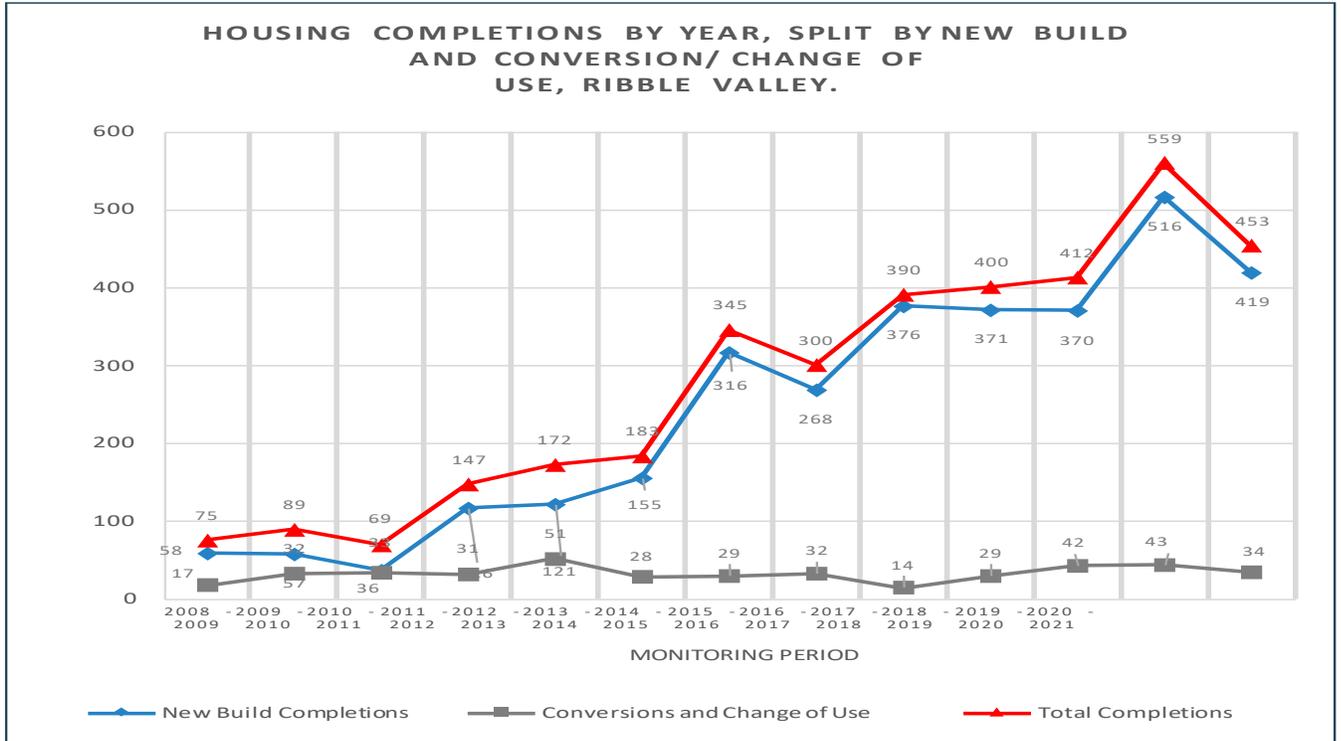
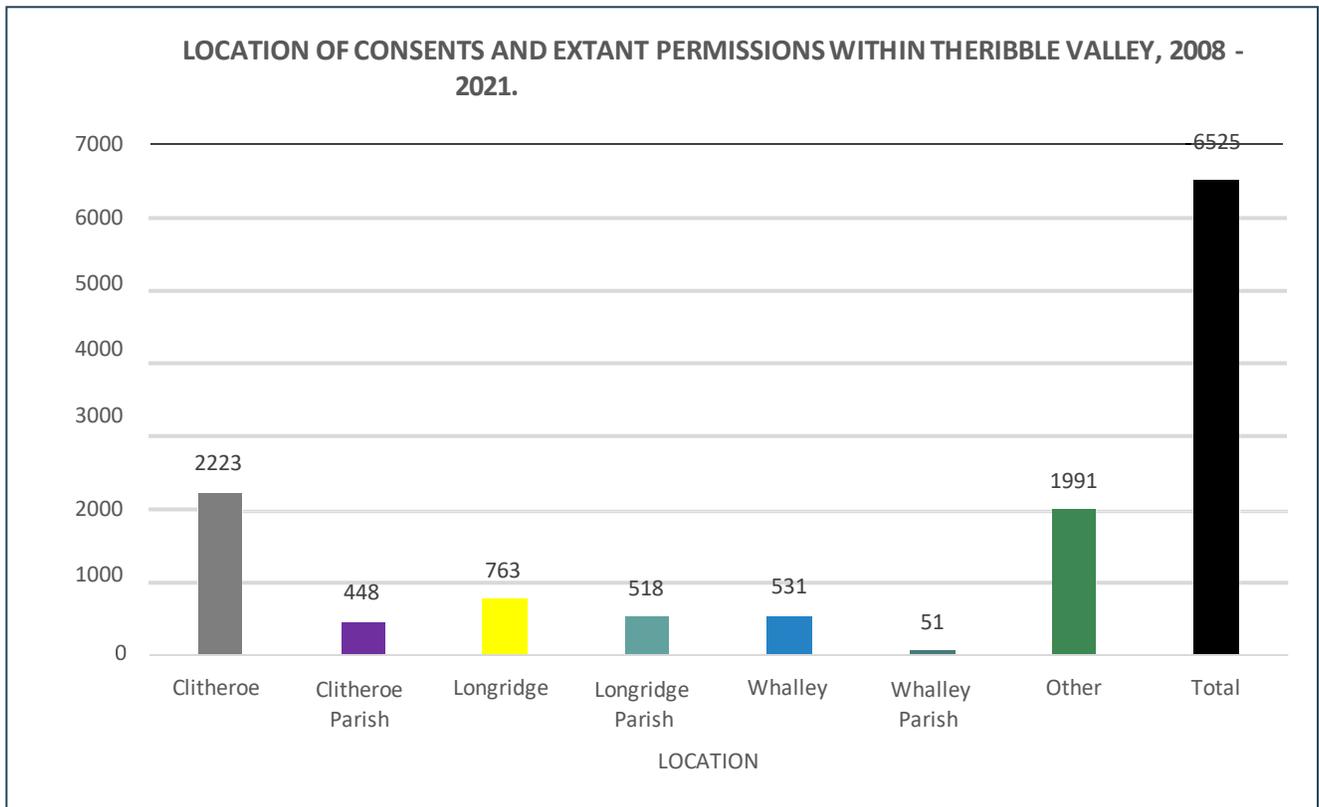


figure 1

As the council has been planning at a level of 280 dwellings as the minimum and taking account of previous undersupply in establishing its 5-year position, this level of housing is reflected in the supply of houses both completed, under construction but also with planning permission as yet to be delivered. Information on the supply situation is included in our evidence base but can be summarised and illustrated in the graph (figure 2) below;



Changes to Government policy have altered how the requirement for housing in an area is established compared to the approach used for the Core Strategy in 2011. The approach is to apply a Standard Methodology (see NPPF/NPPG) in order to calculate the baseline requirements for housing. It is designed to address projected household growth and historic under supply and affordability to determine an appropriate local housing need (LHN). The calculation is based upon a range of Office for National Statistics (ONS) data including household growth projections and house price to earnings data.

This approach provides for a much lower housing requirement for the Ribble Valley as the minimum level of housing. It is a statistical formula that takes account of changes in the number of households, demographics and the impact upon affordability as a result of the supply of new homes. It is a process of the local plan to establish the most appropriate housing requirement for the area, and the council is keen to receive your views, evidence, and justifications to support alternative levels of housing requirement for the area.

The calculation using the Standard methodology generates a baseline, annualised figure (as at March 2021) of 130 dwellings. For further details of how this figure is derived refer to the Annual Housing Land Statement.

At a baseline of 130 the annualised figure for 5-year purposes becomes 137 equal to 685 over a five year period and 2055 dwellings over the plan period. (15 years). It needs to be borne in mind however that the SM figure recalculates each year usually with minor data driven adjustments and that LPA's are required to review their plans every 5 years including the housing requirement element and so this requirement is likely to be subject to change. The government may also review its approach to the Standard Methodology which the council will need to take in to account.

The impact of the Standard Methodology in determining a 5-year supply of housing is also significant compared to the previously established housing position. Again, more information is included in the evidence base, but the comparison can be illustrated as follows:

Supply Numbers: (as @ March 21)	1957 dwellings (deliverable and available sites)
5-year supply based upon SM	14.2 years
5-year supply based upon Core Strategy	6.65 years

The council is required to ensure that it maintains an ongoing supply of available land to deliver housing. It monitors planning permissions and completions to ensure that requirements can be met. This information is published in the Housing Land Availability Survey, the AMR and the supply position summarised annually in the 5-year housing statement.

At first sight applying the SM based figure would suggest that there is little need to release further land at this stage and that the council has already made provision to address requirements going forward through existing commitments. Indeed, what is vital now is to ensure that committed developments are delivered. By controlling the release of additional land through planning policy this can focus investment on those sites that are already in the system.

However, as the graph (figure 1) illustrates notwithstanding an earlier need to catch up on delivery, the development rates experienced in the Ribble Valley are significantly higher than the planned rate of delivery, such that permissions are being used up, and in reality, few new sites have come forward. There continues to be a reserve, but monitoring has indicated that new supply has not grown significantly in recent years as the market has focused on those sites already in the system. Consideration needs to be given therefore to identifying a future reserve of sites through the local plan to help guide development patterns in the future and enable some certainty on where development will take place and in particular what infrastructure needs to be delivered.

If we look at the monitoring information the council has identified the amount of land that it can commit to the 5-year supply, and also the number dwellings that whilst committed, are not anticipated to come forward before the 5-year period. The total number of dwellings anticipated to deliver after 5 years is 1107 in terms of future supply.

We have also identified that on average small sites are delivered at an average of 49 per year and we currently allow for 246 units in the 5-year supply. It is reasonable to predict that this level of small sites in area like Ribble Valley is likely to be maintained.

We have therefore assessed that in the last 10 years of the plan our supply at this point is likely to be in the order of $1107 + 246 + 246 = 1599$ dwellings assuming no other sites come forward.

The LHN to address in that 10-year period is anticipated at 1370 (that is 2×685) dwellings giving a surplus of some 229 dwellings or approximately 17% in surplus against the LHN. This could reinforce the need to consider not making further allocations at this stage but that this would need to be kept under review and potentially allocations considered at the next 5-year review.

Further analysis of the monitoring data however raises an important factor to consider and that is the rate at which sites are being built out. This is showing an average since the start of the Core Strategy in 2008 of around 276 units a year but looking at the last 5 years the average build-out rate is 443 dwellings. Factor this build out rate into the supply data and it gives a different picture again. At this rate of delivery our existing supply will be used within 4.4 years (by 2025) and against the total identified supply within 7 years (by 2028) leaving a further 5 years within the plan period to identify land for or be at the risk of sites coming forward in an uncontrolled and unplanned manner.

In these scenarios additional land should be identified for years 2028 -2033 of the plan period but to ensure development can be properly planned some land will be required for the period from 2025. Whilst there will be requirement to review the local plan in 5 years from adoption (that is a review anticipated by 2028) it is likely that housing land will need to be planned for in this plan review despite the lower local housing need resulting from the Standard Methodology.

Based on the approach proposed the Council will need to make provision for a minimum of 1096 houses in the period 2025 to 2033 (based upon a LHN of 137 per year). This will mean additional growth will need to be accommodated against the chosen development strategy. However, the Council needs to ensure, given the development pressures in the area that land is released in a timely manner and supply is not used up prematurely in response to market demands rather than

planned requirements. It is proposed that as a strategic policy approach any allocations would be identified for release only after 2026 at the earliest, unless housing supply indicated an earlier release was appropriate.

Whilst the above scenario is based on applying the SM it should be noted that work undertaken by the council's consultant's (Turleys: Strategic Housing and Economic Needs Assessment 2020. which can be viewed on the council's website using the following link: <https://www.ribblevalley.gov.uk/downloads/file/2603/shena-report>) identified that there was a case to maintain the housing requirement around that of the Core Strategy (280 dwellings per annum) as this reflected the historic levels of development being achieved and the economic driver that housing development provided to the local economy.

The council is concerned that such an approach would generate a requirement significantly above that of the Standard Methodology and risks inflating the requirement out of step with National Guidance that indicates that LPA's should only move away from the SM where there is a growth approach being pursued or there are other exceptional circumstances such as regeneration imperatives that would warrant it. The council does not believe this is the case in Ribble Valleys circumstances.

In reality it needs to be recognized that with existing commitments housing will continue to be delivered and it will take time to move towards a SM based figure. The council believes that by planning at the SM baseline this will help promote delivery of existing commitments and will avoid a significant oversupply of sites enabling a smoother transition to planned sites being identified through the planning process.

PROPOSED HOUSING REQUIREMENT

In summary the housing requirement to be addressed is therefore proposed as 2330 for the period 2021 – 2038. This allows for a baseline of 2021 and a 15 -year period going forward assuming an adoption baseline for the local plan in 2023.

Against this requirement our supply position is as follows:

Current 5-year supply = 1957

Residual to find = $2330 - 1957 = 373$

Identified pipeline supply with planning permissions = 1107

Surplus of 734 (+37.5%)

In addition, small sites would be likely to come forward as a minimum, as well as other sites that are policy compliant. This approach would not see a need for expansion of settlements as currently defined but may limit choice in the longer term which the council would need to respond to in future reviews.

An option for the council is therefore to plan, going forward on the basis of the SM requirement but comments on this approach are invited, in particular views on whether this is an appropriate level to plan for and if, despite the residual position requiring no additional supply to be identified at this

stage the council should make some provision to address current build rates to smooth the transition towards the Standard Methodology based LHN in the longer term and phase new land release.

AFFORDABLE HOUSING

Evidence Base: SHENA; HLAS; 5 Year Statement; AMR; Draft Homelessness Strategy.

Affordability is a key issue within Ribble Valley as an area with very high housing values that continues to place pressure on many resident's ability to access housing. The council has pursued as a corporate objective a desire to try and re-balance the housing market by seeking to match needs with supply. This of course continues to be a challenge and the lack of truly affordable housing has an impact upon people being able to remain in their local area, live close to where they work or return to support older family members. There is a recognized impact on workforce who often live outside the borough and travel in which has been identified by business as a constraint upon both recruitment and retention of their workforce and pressures upon costs as people increasingly find transport and travel costs with employers in competition against opportunities in other areas for people to take up.

There are also ongoing issues around the availability of the right affordable stock to address people's needs as well as tenures that people can afford with a well reported shortfall in affordable rented accommodation. The SHMA report sets out detail of key issues in relation to affordable housing and also provides for the area, based on national guidance an assessment of need for Affordable housing.

One advantage of the levels of housebuilding that have occurred in recent years is the ability to address the identified needs for Affordable homes through new development. The adopted policy in the Core Strategy which sought a 30% affordable housing contribution on most sites has seen a significant increase in availability.

Delivery of affordable units is a key monitoring metric and the council has achieved success in securing provision since the start of the Core Strategy period with some 929 affordable units delivered with further units secured in on going commitments. Evidence prepared for the Core Strategy identified that the council would need to secure some 404 units per year. The most recent SHENA calculates a need for affordable housing of some 88 dwellings annually. This is important in considering the housing requirement overall as the main mechanism for delivery relies on new house building. Consequently, any significant reduction in requirement going forward, notwithstanding existing commitments is likely to have a long-term impact on the ability of the council to address local housing needs. This is a component of the consultants reasoning set out in SHENA that a higher than SM requirement should be considered and the suggestion that the council will need to maintain a requirement of around 280 units per annum to meet these needs as well as economic growth.

On the whole the current policy framework in relation to affordable housing has been successful. It has driven up supply but policy requirements have also sought to secure stock that meets the needs

of older persons with a requirements for specific percentages of units (both affordable and market) to be aimed at meeting needs of older persons.

The consultant's report (Turley) recognizes this but also identifies that going forward in terms of needs there is a shortfall in smaller units for single person households and starter homes and also a need for affordable, larger family homes with 3 and 4 beds to meet needs. This will require an adjustment to the council's policies on house types which to date, with the exception of older persons requirements has tended to be market led reflecting market demands.

The council is interested in your views on how affordable requirements should be addressed and indeed the extent to which housing requirements should be influenced by the need to ensure delivery of affordable housing.

Employment and Growth

Evidence Base: Economic Baseline; Employment Land Review; Economic Strategy; AMR

The Ribble Valley is able to demonstrate a robust local economy with a wide variety of business operating across most sectors. In the past the main issue has been the availability of land to support economic growth and deliver locally based employment. Land requirements were identified through the Core Strategy and sites allocated in the Housing and Economic DPD to deliver against those requirements. These allocations coupled with a number of long-standing commitments have been able to support economic stability and contrary to the start of the Core Strategy investment circumstances have been right to drive demand with the consequence that much of the supply has been delivered. The council is in a situation where the ongoing strength of the local economy, seemingly largely unaffected by the broader impacts of the pandemic is driving the need for further land release if current growth is to be sustained.

The council commissioned Lichfield associates to undertake an employment land review, the report of which is included in the evidence base and can be accessed via the council's web site. This reports on a range of key factors but at this stage there are a number of issues arising that the council considers key to shaping the new local plan.

These three key issues relate to the amount of new land to be delivered, where it should be and also the influence of the identified growth on the workforce, in particular the resulting impact upon housing requirements.

Lichfield's have undertaken an assessment of the need for employment land and demonstrate that the council should be planning in this local plan for between 22ha and 26ha gross, of new employment land depending upon the levels of growth deemed appropriate for the borough. Whilst there is an existing identified supply this is not enough in itself to meet the identified requirement. Consequently, additional land will need to be identified and allocated. The issue to address is location and fit with a preferred development strategy and of course the availability of suitable land.

Existing strategy seeks to focus new employment development (beyond committed sites) towards the main settlements (Clitheroe, Longridge and Whalley), the strategic site at Barrow and the enterprise zone. Policy also directs employment development towards the A59 corridor.

In reality much of the employment space delivered has been on long standing commitments with the exception of development at Mellor where Thwaites have developed their new facilities and Headquarters. Clitheroe has seen development in existing employment areas, whilst the needs of Longridge were supported by allocated land. Little new land has been brought forward in Whalley itself although the successful development of the former Genus site on Mitton Road near Whalley has seen a significant amount of new employment space delivered at Mitton Park.

The challenge for the council is therefore seeking to identify land to meet the requirement ensuring it is in the most appropriate locations.

Identified minimum requirement:	22.00 Hectares (Gross)
Current supply (committed sites):	11.51 Hectares
The suggested minimum Residual to address is:	10.49 hectares (say 10.5ha)

The evidence effectively indicates that a minimum of 10.5ha of additional land for employment needs to be identified and that this should be suitable for office industrial and warehousing uses. The evidence also advises that the primary areas for locating new development, reflecting market demands should be Clitheroe, Longridge, Whalley and the A59 corridor.

With this in mind the council anticipates making new allocations for additional employment land to address this shortfall, and to encourage the retention and re-furbishment of existing stock.

The council in preparing evidence for the local plan review published a call for sites in September 21 and this identified a number of sites suggested as employment land amounting to 61ha.

These sites include the following:

Clitheroe	6.07 ha
Chatburn	1.1ha
Balderstone	4.1ha
Longridge	2.1ha
Langho	1.5ha
Pendleton (A59)	24.49ha
Pendleton (A59)	18.821ha
Whalley	2.5ha

However, at this stage the suggested sites have not been subject to any detailed assessment beyond the principle of their availability. Lichfield's also undertook a review of the potential to provide additional land release which is set out in their report. In total some 78 hectares of land was considered as being potentially available through that process and this is set out in their study.

Land for employment will be identified following further site assessments and the establishment of the proposed development strategy for the area. Regard needs to be given to attitudes towards economic growth as this will impact upon housing requirements, sustainability through providing more local job opportunities balanced with wider environmental considerations driven, in particular by location and scale. The council is keen to receive views on these issues including whether the target should be at the higher end of the range and whether the existing focus on main centers and the A59 corridor should be maintained.

Main Centers and Retail

Evidence Base: Economic Profile; Town Centre Health Checks; AMR; ARK Report

Our monitoring and evidence base has identified that our main centers remain strong and that our retail offer since the core strategy was adopted has grown with additional retail space being created through new developments both within centers and to a lesser extent at other appropriate locations controlled through the application of planning policy.

Existing development plans for the area do not allocate specific retail sites, applications are considered through policy tests. What should be noted is that the quantity of new development required identified within the Core Strategy has been exceeded yet the centers continue to perform well with new development taking place within Clitheroe and Whalley through conversion and change of use. Whalley has experienced significant change in the nature of its offer and there are concerns that there has been a loss of traditional retail outlets. Longridge has seen limited change, although it should be noted that the recently developed ALDI supermarket developed adjacent to the borough boundary in Preston will support retail choice for the locality albeit not within Ribble Valley itself. It will provide opportunities for linked trips and will contribute to the overall attractiveness and strength of Longridge as a retail and service center.

The Council considers that the existing main retail areas designated in the plan for these centers remain correct and should be carried forward from the 2019 HED DPD and that existing policy is still appropriate in delivering a town center first approach.

What does need to be addressed are the implications of the recent changes to the use class order which enables a much wider range of uses to take place in the high street. This will impact upon the details of existing Core Strategy policy which seeks to control uses in key areas in Clitheroe and the policy will need to be updated to reflect current guidance.

The main issue to consider is whether the council is correct in maintaining its policy approach to each of the main centers or whether an alternative is necessary. Views are welcome.

