Philip Dagnall

From: Andrew Givens (agivens@blackdown.org.uk)
Sent: 11 June 2014 20:01
To: Post Hearings
Subject: Post Hearings May 2014 - Ribble Valley Core Strategy 2008-2028 - comments on proposed Main Modifications

To Whom It May Concern:

I wish to respond to this latest consultation on the Core Strategy following the publication of proposed Main Modifications to Submitted Core Strategy as notified in letter date 16th May 2014. Further to my previous submissions I still believe that the central aspect of the strategy – a strategic development site of 1,040 dwellings – makes the whole plan un-sound. This is for the following reasons:

1) The size of strategic site is too large relative to Clitheroe.

2) The response to the outline permission request for 1,040 dwelling (strategic site) from Natural England was that the site is too close to an AONB. However, the council claim that they have taken account of the AONB in their proposed changes - "In allocating development, the Council will have regard to the AONB,..." (as per modifications table MM6). If the council had indeed taken due regard then they would have noted Natural England's response and sought to remove or significantly reduce the development planned on the strategic site at Standen.

3) Another change at this late stage to the housing provision, increasing a further 12% from 5,000 dwellings to 5,600 (MM15). This is the second increase – the first being 25% from 4,000 to 5,000 dwellings which occurred at the previous consultation to this one.

4) The delay in agreeing the Core Strategy seems to result in a complete disregard for the number of houses passed for planning since the start of this process and thus instead of these been deducted from the required total, they are simply added on. This is demonstrated by the change to the end date used for calculating the number of houses in supply which has been changed at each consultation and is now 31st March 2014 (MM8, MM14 & MM17). This demonstrates the unsoundness in the Core Strategy and this consultation process because it results in more houses been built than were originally proposed at the start of this process and thus is a moveable feast on what is the primary issue – ‘the number of houses to be built from 2008 to 2028 in the Ribble Valley’.

5) A total disregard for the sheer scale of Ribble Valley and the number of villages within its boundaries. The proposed changes suggest development outside Clitheroe, Whalley and Longridge will equate to 45 dwellings per settlement (MM15). Some villages, like Slaidburn could take considerably more than this. The end result would be that the required number of dwellings spread throughout the Ribble Valley would mean doing without the Standen strategic development site.

6) No account has been taken of the shortage of Secondary schools. Of the two state Secondary schools in Clitheroe one is beyond its capacity (Ribblesdale) and one is only available to a select few (Clitheroe Grammar).

7) The strategic site is not a balanced development in proportion to the Ribble Valley geographical area. It is too large a development in one location.

8) The strategic site reduces amenity and recreational land – ‘green spaces’ – vital to providing a desirable location to live in and being so close to an AONB, it has a detrimental impact on the area and will significantly diminish the quality of life for residents within Clitheroe and the surrounding

12/06/2014
9) Council services provided in Clitheroe — swimming pool, parking, medical services, etc. are already at capacity. A development of this scale will only compound this problem. There are several different sites in Clitheroe (i.e. Henthorn Road, Primrose Mill, Waddington Road, Low Moor, Clitheroe hospital) which have either had planning approved or are in the process of obtaining planning adding 1,223+ new houses (according to appendix 2 table). Thus why is this large “strategic site” needed? Or can it at least be reduced by 50% or more to account for these other extra houses now in the pipeline.

10) Although it is acknowledged that the Section 106 agreement within the recently approved outline planning permission for the proposed strategic site provides for money to be paid to support bus services, pupil places and sports facilities this will be insufficient in the long term when the money is spent. It allows for provision for bus services for 10 years thus falling well short of the expected life of the houses to be built on the proposed strategic site. It is thus financially unsustainable to propose such a large site which will have a long term financial demand upon Council services which are already stretched to their maximum to meet the needs of the current population.

11) The strategic site could take 10 to 15 years to complete and would only be undertaken by a large scale, national house builder due to the infrastructure costs. Thus not only could the required 5,600 dwelling target be achieved quicker if smaller developments were spread around the Ribble Valley but that the local economy would benefit as the profits would be spent locally by local builders rather than taken out of the area.

12) The strategic site was only a few years ago ‘green belt’ designated and it is still made up of green fields farmed by a 3rd generation farming family. The modification to Policy DMG1 (MM47) states that previously developed sites should always be used instead of green field sites where possible. Please could this firm intention be applied to the rationale behind the location of the proposed strategic site and thus non-green field sites scattered throughout the Ribble Valley be used up first and completely before any green field sites are used to be build houses on.

Therefore in conclusion, I object strongly to the Main modifications of the Core Strategy changes seeing them as unreasonable, unsound and not being based on the local evidence. There is a clear need for housing on a moderate, geographically spread scale but not for a large 1,040 dwelling strategic site. The detrimental impact of such a site on the local services, traffic, roads, and quality of life for local people could take years to resolve and at a greater financial cost than if the burden of more housing was spread throughout the Ribble Valley.

Please confirm receipt of my submission.

Yours sincerely,

[Signature]

[Signature]

[Signature]

12/06/2014
Philip Dagnall

From: [Redacted]
Sent: 29 June 2014 21:45
To: [Redacted]
Subject: Core Strategy Main Modifications response

Dear Sirs,

Our response to the Proposed Main Modifications to the Core Strategy May 2014 is as follows:

1. The number of houses required throughout the borough has been increased from 4,000 to 5,600 (MM 15) but search through the document as we may, we cannot find the justification for this.

2. The Housing Trajectory (MM48) appears to show that there are currently sites within the Borough with planning permission for 2711 homes. This includes the Strategic Site at Standen. Without the 1040 homes projected at Standen this means that there is currently land with planning permission for 1671 homes. As the figure of 1671 roughly equates to the extra number of houses added to the original 4,000, it would appear that in effect the modified strategy is not taking into consideration the number of homes for which planning permission has been granted since the core strategy was originally set out. The Borough is simply accepting that a much larger number of houses be built than originally proposed.

3. With the original number of 4,000 houses there would be no need for the Standen Strategic site.

4. Even if our understanding of the document is incorrect and 2058 houses (making a Borough total of 5,600) are still needed between now and 2028, the plan to build over half of them (1040) at Standen is unsound. MM54, Policy DMG2 states that “Development proposals . . . should consolidate, expand or round off development so that it is closely related to the main built up areas ensuring this is appropriate to the scale of . . . the existing settlement”. The proposed development at Standen would be four and a half times the size of Highmoor Park, far too large for the scale of Clitheroe and the facilities and services it is able to offer. It would have only one access for traffic other than buses and emergency vehicles which makes it difficult to see how it would be closely related to Clitheroe. Building a roundabout at the junction of Pendle Road and the A59 will help the residents to leave Clitheroe, but will not help them or the present residents of the town to get down the already congested lower part of Pendle Road, park their cars and do their shopping locally. Land will be made available for a primary school – which is not a promise that such a school will be built - but there is no consideration for secondary school provision and both the secondary schools in Clitheroe are already fully subscribed.

5. MM6 states specifically that regard will be given to AONB and yet the strategy proposals involve building the 1040 houses at Standen in a place close to and clearly visible from an AONB.

6. In our original comments on the Core Strategy we pointed out the need for affordable housing not just in the three main urban centres of the
Borough, but also in the villages because people who have grown up there do not want to move away, and because there is a need for people to work on farms. We still believe this to be the case, and therefore the number of houses to be built should be spread between all the settlements in the Borough.

Yours faithfully,

[Signature]

E-mail: [Redacted]

30/06/2014
Subject: Consultation on Main Modifications to Core Strategy

1. There is a slight discrepancy in numbers between para 3.2 of the SA Report Addendum (prepared by Hyder Consultancy) and the Council's Proposed Main Modifications (page 23). I assume the Council's numbers are simply more up to date.

2. As I understand it, this leaves only 240 residual homes to be built in the Clitheroe settlement area (aside from the Standen development) over the next 14 years or about 17 new homes per annum, which seems to me to be a very small number to play with. But what's not clear is whether the original proposal for 350 houses at Waddow View (subsequently turned down at appeal) or the new revised proposal for 275 houses are included in the 'Commitments up to March 2014' in the Main Modifications report. Assuming that it's not included in the commitments, the revised proposal for Waddow View is a huge project and would absorb all the 'residual houses' for Clitheroe in the period up to 2028, which would afford the Council no flexibility to respond to applications for small scale, micro developments during this period. It would be helpful if the table on page 23 provided some clarification on whether the Waddow View proposal was included in or outside the numbers in the table and what effect such a large scale proposal would have on the overall strategy.

3. I welcome the greater clarification relating to Tier 1 and Tier 2 village settlements.

4. I welcome the change in language from 'elderly' to simply 'older people'.

5. I hoped to see more of a commitment to innovative greener homes with better-than-standard insulation properties and reduced carbon footprint in energy usage.
being required of all new houses including innovative heat exchange schemes. The Core Strategy provides a great opportunity for the Council to promote really effective green homes, not simply ones that meet minimum standards.

I struggle with understanding what a test for 'soundness' might be, it seems to lack any kind of objectivity - but the Proposed Main Modifications appear to meet the Inspector's comments in his letter of Jan 31st, both in terms of the overall need and also the settlement hierarchy. I hope this is sufficient to demonstrate 'soundness' to the Inspector. Any continuation in the current free for all is not in the best interest's of the Ribble Valley.

Yours...
Mr Colin Hir
Council Offic
Church Walk
Clitheroe BB7 2RA
3rd July 2014

Re Post Hearings May 2014
Proposed Main Modifications to Submitted Core Strategy

Meet National Policy Objectives —— against Economic Needs

I write as a resident of Bolton by Bowland, and as a Parish Councillor of that Parish, the hamlet of Holden, Sawley and Tosside within the 32 defined settlements identified, and attempt to bring to your attention there is evidence that the adverse impact of meeting housing needs would significantly and demonstrably outweigh the benefits

Bolton by Bowland, a village of 50 houses is within the Forest of Bowland Area of Outstanding Beauty, and a Conservation Area with higher than average essential open spaces, added to that the many houses listed for the public's interest and enjoyment attract tourism which the Government promotes.

Over the last 20 years the housing stock has been satisfied with extensions, new houses and barn conversions increased by 37.5%. Bolton Hall Estate, custodians of the village rent 27 houses and cottages, a significant proportion affordable houses enabling young and old, and those on lower incomes to live in the area when otherwise they couldn’t.

The parish has little if any facilities, there are no business opportunities, no sustainable modes of transport, we have no doctor, and no sites within the settlement boundary, and with other constraints further development would be damaging to the very attractiveness which brings people to the village, especially as a need for new houses hasn’t been identified.

We understand that the number of new houses set for the next 15 years in Bolton by Bowland is one, three houses in Sawley which makes it sustainable, the majority of new housing development will be concentrated with an identified strategic site location to the south of Clitheroe. As well as making provision through the duty to cooperate, for those needs to be met in full building should be elsewhere within the housing market area
A Character Statement of the Parish of Bolton by Bowland

Bolton by Bowland has a slow population growth with no demand for housing, and there are properties which have been available for rent, or sale for quite some time.

To ensure that development is properly planned, local residents in 2008 were involved in the Strategic Housing Market Assessment. Bolton by Bowland, Sawley, Gisburn Forest Parish Council did not identify a site, or show a need for housing stock then, and nothing has changed.

The meeting during the Core Strategy Consultation period for residents to have their say was poorly attended which showed little support for changes. An area wasn’t identified for new housing stock, or an appropriate site that will still maintain, and enhance the area to retain the appeal of the village.

The Core Strategy Consultation encourages a Parish Plan

With the Estate releasing old barns to convert, and private conversions in the last 20 years new housing has increased by 37.5%. A need has been satisfied, and its already there 16% of the housing stock is empty, or not occupied full time, 31% are rented properties 27.8% of properties are in single occupancy, and 27.8% of residents are over 65. Historically children for the school have come from outlying areas rather than the village, and with a presumption this will change over time, a younger population would be living there.

The Bolton Hall Estate, custodians of the village since 1866, comprises of 6 let farms, and 27 houses and cottages, and the principle source of local employment. They provide a significant proportion of affordable houses excelling young and old, and those on lower incomes to live in the area, when otherwise they couldn’t.

38% Affordable Housing in the village + 70% no limits, would exclude young families. In order to qualify for these properties they have to be first time buyers, elderly people, or those who work in the village. They have to have lived in the village for 5 of the last 10 years, and left to find suitable accommodation. They have to have close family living in the village, and people needing to move into the area to give support care for elderly relatives, and those about to be employed in the village.

PPG6 The countryside tourism should be encouraged, it needs to develop in a way that draws on the character of the village, and the countryside, and does not destroy the very asset on which the popularity depends. Major developments should not take place—the land has to remain underdevelopment—this is what attracts people to visit, and enjoy the area, and that brings in revenue.

There are national heritage assets, and 6 essential open spaces, 2 Village greens are one of the main characteristics of the conservation area, and attributes of the village. The immediate surroundings are recognised as a Conservation Area, and an Area of Outstanding Natural Beauty in the Forest of Bowland, and what contributes and attracts tourists to the area is that very character, and identity.

We believe the area is worthy of an early examination to promote an "Outstanding Conservation Area" to retain the character and appearance.
In response to the Core Strategy Consultation, a survey to establish policies for housing needs, employment, settlement, tourism, the environment, and transport prior to the Local Development Framework, and after a final examination, submit to the Secretary of State.

As a resident of Bolton by Bowland for more than 42 years, I have seen many improvements. A Village Hall was built with local subscriptions, and the School was reprieved from closure in 1980. We subscribed to both with gusto because we want to see the village thrive.

At the same time we are sufficiently interested in the future of the many listed buildings in the village, and their setting, to be concerned that as our old building inevitably decrease in number the value of those that remain are a finite asset, and once lost they are irreplaceable.

Bolton by Bowland a beautiful Conservation Area Village, in the Forest of Bowland Area of Outstanding Natural Beauty. Its not an ordinary parish, it was surveyed in the Domesday Book, and has a landscape, building and structures in which the material evidence of the past and the story it tells remains visible and legible. With 21 listed heritage assets that include a Grade I Listed Church they are recorded as of “exceptional national interest”

We believe Bolton by Bowland is a special case, further development would not be consistent with policies, and would discourage the many visitors who come to enjoy the area. Above all, there is a need to provide a more nuanced understanding, and it is essential to avoid standard solutions that take no account of the local character, and the factors that led to it should guarantee a future for generations to come.

With private conversions of redundant buildings, and Bolton Hall Estate who have released barns the housing stock has increased by more than a third. 16% of the houses are empty or not occupied full time, almost a third are in single occupancy, and with a third of the population aged over 65, leaves no demand, or eligibility for affordable housing.

We have provided an accurate, and up to date Parish Plan taken from the Settlement Boundary for development, and the Conservation Area Appraisal of Bolton by Bowland, completed in 2006. We have had discussions with residents, attended three meetings to discuss the Core Strategy, and a copy of one sent to the Parish Clerk.

Bolton by Bowland has a tightly constrained settlement boundary for development, there are no plans to change the boundaries, no sites to accommodate housing, and with 6 essential open spaces, and 2 village greens. The need for housing has been satisfied, there is little employment What we need is transport out of the village to the market town after the Doctor closed the surgery, the Post Office was closed, and we have no police service.

My main issue is that you will consider Bolton by Bowland worthy of an early examination to promote an “Outstanding Conservation Area” to retain this special village for future generations, and at the same time this will encourage tourism.

Yours sincerely,
I am writing as a member of Chipping Parish Council with regard to the modifications to the Core Strategy and how it impacts the Chipping Village Plan.

The proposed modification shows that Chipping is to be classed as a Tier 2 settlement for sustainability reasons. Housing development will only be approved for 'Local Needs and Regeneration Benefits'. The impact of the Strategy will depend on how this statement is interpreted. It is hoped that it would allow for much-needed housing for older people.

The Chipping Village Plan recognised that some additional housing (approximately 50 over 10 years, within the settlement boundary and on brown field sites) would be welcome in Chipping to help sustain villages schools, churches, shops and pubs. The outcome of the Core Strategy will be to stop this development and reduce the viability of local schools, etc. The drive for 'sustainable housing' will end up with 'unsustainable communities' as local services (eg buses, schools, shops) disappear because they are not economically viable.

The Core Strategy proposed would however stop the over-development of the village and loss of green field sites which is welcomed.

The proposal may lead to another long period with little or no development which will be a detriment to the village. It would be better to include vibrant communities such as Chipping as a Tier 1 village and have a small allowance for tightly controlled housing development that would help sustain the village.
Forward Planning Team
Ribble Valley Borough Council,
Council Offices
Church Walk
Clitheroe
BB7 2RA

2nd July 2014

To the Planning Team,

Core Strategy-Consultation,

I am a former Parish Council Chairman and have lived in the Borough for the past twenty six years.

It is not possible for me to fully understand or appreciate every fine detail that has been considered and prepared for compliance with the National Planning Policy Framework and the Inspector’s requirements. However, I have looked very closely at the NPPF and the Ribble Valley Core Strategy and I am convinced that RVBC have provided, as amended, a sound Core Strategy which should be approved for adoption.

The assessments of Sustainability have been made in accordance with the Official Guidelines. The tables and spreadsheets, although “broad brush” in some respects, do show a clear statistical assessment of Sustainability throughout the Borough.

In the case of Copster Green a current full and detailed local analysis established overwhelmingly the difficulty of Sustainability and other important factors, which led to an outline planning application refusal carried unanimously by the Planning Committee on the 26th June 2014.

It is, in my opinion, of paramount importance that a “local authority” has the full impartial support of the Inspector in fine tuning “broad brush” assessments to actual specific location situations and neighbourhood needs and priorities, at the outline planning stage.

Yours faithfully,
On reading the core strategy amendments I note that Gisburn is considered to be a Tier 1 Village in terms of its sustainability for further development. The target figure for new houses in the village over the 20 year period to 2028 is 16 and the documents state there are currently 11 houses approved so a further 5 are needed to achieve the target. This is incorrect as there are currently 40 permissions for new houses or conversions in the parish, the majority of which are within the current settlement area.
I have read your revisions with interest and only have one question. How can the green belts that currently exist between Clitheroe and Barrow and Barrow and Whalley be protected to ensure that they are clearly identified as separate residential areas. Surely the green open area of land that greets residents and visitors to Clitheroe as they drive along Whalley Road into the town should be preserved to ensure we remain a rural town that is clearly identified as such.

Is it not possible to cap the number of houses one planning application can include for a single site to prevent any further large scale developments being submitted by Land Grabbing companies? Surely it is better for the area to preserve the integrity of the towns and villages and to have smaller developments of quality properties rather than the large, unimaginative and prescriptive developments that are surrounding the towns of Clitheroe and whalley now. How about encouraging some forward thinking architects to come up with housing designs for the 21st century instead of allowing the rabbit hutch houses to be built.

The core strategy doesn't inspire confidence that we will somehow now be protected from the the greedy local land owners being seduced by land grabbing companies into putting large scale planning applications into the council. I am not sure how the core strategy really helps the council to prevent these type of things happening in the future and does it offer the council any weapons to defend these large scale applications for single sites?

Yours Sincerely
Dear Sir/Madam,

After seeing this Core Strategy being passed back and forth between RVBC and the interfering Government (inspectors) I find that the only thing left to do is protest about the never-ending continual interference in this matter by the government-it matters not a jot what is the opinion of residents, the government inspector will as usual over-ride local opinion and do what it wants so much for Localism! Same as in Wilshire where I live, one inspector overturns 100's of objections and a RVBC refusal and we end up soon with a wind farm on Greenbelt land-'to help the Carr Hall business' the inspector said. Carr Hall has not been open for business once this year! For what it is worth my sympathies lie with RVBC and the poor folk working on this strategy who have at all times been dictated to by the Government who have taken no notice of the people of Ribble Valley and I believe there is no point to these consultations. Many thanks for trying anyway.

Begin forwarded message:

From: "Post Hearings" <Post.Hearings@ribblevalley.gov.uk>
Subject: Ribble Valley Core Strategy Post Examination Consultation May - July 2014
Date: 23 May 2014 16:39:33 BST
To: undisclosed-recipients:;

Dear Ribble Valley LDF Database Member,

please find attached information relating to this planning policy document consultation

Best in the country for customer satisfaction – 94% of Ribble Valley residents are satisfied with life in the borough (Place Survey 2009)

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06/06/2014
Ribble Valley Care Strategy 2008 - 2028

Having viewed the council's latest consultation particularly regarding the sustainability addendum we agree with the changes. We would, however, ask that the strategy be adopted as soon as possible to prevent anymore greedy developers putting their building plans in so as to get under the wire and pre-empt the core strategy.

Yours sincerely,
Re—Colin Hirst,

I am like, so many of the Ribble Valley residents, registering my opinion to the proposed core strategy, and believe that your 20yr plan is basically flawed, and seen as too much, too soon, without due consideration to the services, and the public's appraisal of how a town should grow.

The property developers will enjoy pleasing the government think tank, and believe they can run rough-shod over the wishes of the electorate... During the 20yrs of this plan, there will be private builders who will submit plans for house building, dwellings for expanding families, and re-development to run-down properties...these are extra to anything granted to the 'big boys'...

Please let common sense prevail

Yours respectfully
Philip Dagnall

From: [Redacted]
Sent: 06 June 2014 11:21
To: Post Hearings
Subject: Ribble Valley Core Strategy Comments

Dear Mr Hirst

Following receipt of your letter ref: Post hearing May 2014 dated 16/05/2014 we would make the following comment.

Having previously made our comments to the Core Strategy known to you we would not wish to repeat those again as we feel that they should already have been taken account of in the review. However we are still concerned at the lack of provision for the elderly residents in the communities regarding specific inclusion of sheltered, super sheltered and managed elderly communities. We are pleased that 15% (with 50% of these apportioned to affordable category) of any new housing developments are directed at older persons but are concerned that with the growing elderly population and differing wealth demographics, the numbers and types may be inappropriate; i.e. has a survey been established to determine demand and type. We visited the recent builders exhibitions at Longridge and came away with the impression that they were focussing on 3 and 4 bed houses where they could make the largest profits. Any discussion regarding bungalows for example were always in the future (which we took to mean would never come) and there was no discussion regarding sheltered or managed housing.

Hope this helps

Yours sincerely

[Redacted]