Ribble Valley Core Strategy
Regulation 19 Comments Form

Before using this form to make any comments please ensure that you have read the Core Strategy document and the Guidance Notes, which can be found on Ribble Valley Borough Council's website - www.ribblevalley.gov.uk and follow the Core Strategy link. If after reading the Guidance Notes you should have any queries in completing the form please telephone 01200 425111.

This form has two parts:
Part A - Personal Details (you need only complete one copy of Part A)
Part B - Your comment(s) (Please complete a separate Part B for each comment you wish to make.)

All completed comments forms must be received by the Council no later than 5:00pm on Friday 15th June 2012.

Please return paper copies marked 'CORE STRATEGY CONSULTATION' to Council Offices, Church Walk, Clitheroe, BB7 2RA

Part A

Q1 Please can you provide the following information which will assist us in contacting you if we need to discuss any of your comments further.

Name
Name of Organisation (if you are responding on behalf of an organisation)
Database Reference number (if you have one)
Address
Post Code
Email address
Phone number

Copies of all comments made in Part B of the form will be put in the public domain and are not confidential, apart from any personal information. All personal information within Parts A and B will only be used by the Council in connection with the Local Development Framework and not for any other purpose and will be held in accordance with the Data Protection Act 1998. The Council will summarise the comments and all representations will be made available to the Planning Inspectorate.
Please use a separate form for each individual comment.

Q2
Name / Name of Organisation (if you are responding on behalf of an organisation)

Q3
To which part of the Core Strategy does this comment relate?
Part of document eg Key statement reference, 'Vision' section etc...

Ch.8 Delivery Mechanisms & Infrastructure

Paragraph No.

Q4
As a consequence do you consider the Core Strategy is:

i) Legally compliant
   Yes
   No

ii) Sound *

The considerations in relation to the Core Strategy being sound are explained in the Guidance Notes

Q5
If you consider the Core Strategy is unsound, is this because it is not... (please tick the appropriate box)

Justified
Consistent with national policy

Effective
Positively prepared

Q6
Please give details of why you consider that the Core Strategy is not legally compliant or sound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments. Please continue on a separate sheet if required.

The Core Strategy is unsound for the village of Whalley when considering highways educational provision.
Educational Provision.

(See attached sheets)
Q6. Highways.
The plan is not effective as mitigations to relieve traffic congestion are impossible to implement in Whalley village due to:
- physical restraints on road widths - main thoroughfare runs through conservation area
- mini roundabouts at two key junctions within the village are already approaching capacity
- 165 permissions already granted to build in the village since 2008 will generate traffic to put the junctions over capacity
- permissions to build in neighbouring villages of Barrow and Billington will add traffic to existing flows
- two bypasses already built round the village to alleviate previous problems – nothing left to bypass
- Lancashire Highways have no plan to alleviate traffic problems other than TROs which have had little effect in the past

Evidence – see Traffic Report for Whalley prepared by Capita Symonds (copy lodged with Save Whalley Village Action Group submission)

Q6. Educational provision
The plan is not effective nor is it consistent with national policy for Whalley village. The lack of school places within the stated two mile radius of any development within the village would make that development unsustainable.

- Whalley school is already at or approaching capacity (11 children on the waiting list for places to Reception Classes for September 2012)
- Whalley’s family of schools similarly at or over subscribed
- Increase of 7% in live births nationally will require more places due to natural growth in numbers
- Lancashire LEA already spending £400,000 + transporting children within the Ribble valley to/from school (figure does not include cost of pupils at Special Schools/Units)
- Whalley C of E Primary School will not expand any further (Governor’s decision/built in Conservation Area/not fit for purpose/Diocesan Board of Education will not sanction) neither will Langho St. Leonards C of E, Langho St. Mary’s RC). Barrow is to expand (by 102 places over the age range) but to accommodate children generated by new developments in Barrow (proposed number of houses for Whalley would generate 131 pupils alone)
- No site available in Whalley village for a new school
- “There are numerous primary schools within the borough. These serve the whole borough and the residents of Ribble Valley with a variety of choices.” (RVBC Local Infrastructure Plan April 2012 p.43) This statement suggests that eg Whalley residents could send their children to any school therefore there is no difficulty in finding places. This is neither consistent with national policy nor is it effective.
Similarly, “There are numerous secondary schools found within the surrounding towns with the scope to serve additional Ribble Valley residents.” (RVBC Local Infrastructure Plan April 2012 p.43). This statement is in direct contravention of Ribble Valley’s stated policy of Ribble Valley Schools for Ribble Valley children.

Children being transported to schools outside the two mile radius let alone those within it, make the planned number of houses for Whalley unsustainable and therefore not in accordance with policies in the framework.

(NB Figures supplied by Lancashire LEA Pupil Access / Forward Planning Teams)
Q7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness.

You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible. Please continue on a separate sheet if required.

By reducing the house building requirement for Whalley the issues become more manageable then the plan becomes possible. Other settlements with similar facilities/services to Whalley can absorb more houses as Whalley has already seen growth larger than any other settlement in the Ribble Valley particularly over the last 20 years.

Please note: your comment should cover succinctly all the information, evidence, and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be another opportunity to make further comments based on the original comment made at the publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination in the forthcoming Examination in Public. Please note also that the Inspector is not obliged to consider any previous comments that have been made in respect of the Core Strategy. You are urged, therefore, to re-submit on this form any previously submitted comments that, in your view, remain valid and that you wish the Inspector to consider.

Q8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?
   No, I do not wish to participate at the oral examination [ ]  Yes, I do wish to participate at the oral examination [x]
Q9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Please note that the Inspector will determine who participates.) Please continue on a separate sheet if required.

To expand on my submission.

Q10. If you wish to be kept informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the box(es) below.

- Submission of the Core Strategy to the Secretary of State for independent Examination
- The publication of the Inspector’s report following the Examination
- The formal adoption of the Core Strategy

Q11. If you have any other comments to make on the Core Strategy that have not been covered elsewhere, please use the box below. Please continue on a separate sheet if required.

Q12. Date of completion

14.06.2012

Q13. Signature

Thank you very much for taking the time to complete this comments form, your comments are very much appreciated.

If after reading the Guidance Notes you should have any queries in completing this form please telephone 01200 425111
Part B

Please use a separate form for each individual comment.

Q2
Name / Name of Organisation (if you are responding on behalf of an organisation)  JNWWalker

Q3
To which part of the Core Strategy does this comment relate?
Part of document eg Key statement reference, 'Vision' section etc...
Ch. 6 Housing

Paragraph No.

Q4
As a consequence do you consider the Core Strategy is:

i) Legally compliant  
Yes  
No

ii) Sound *

Yes  
No

* The considerations in relation to the Core Strategy being sound are explained in the Guidance Notes

Q5
If you consider the Core Strategy is unsound, is this because it is not... (please tick the appropriate box)

Justified  
Effective  
Consistent with national policy  
Positively prepared

Q6
Please give details of why you consider that the Core Strategy is not legally compliant or sound. Please be as precise as possible.

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The Plan is not Legally Compliant nor Sound in terms of being positively prepared or justified.

RVBC has consulted at every stage of the Core Strategy process. The requirement to consult with local people has been met but their opinions have been ignored in favour of other stakeholders who come armed with professional advisers.

In the case of Whalley over 400 responses were sent in the early stages of the process, all against the high number of houses allocated to the village. We still find that we are being allocated some 9% of the total for the valley when we have only 6% of the population.

As the process of consultation has progressed less responses have been sent due to the increasing complexity of the response format. For this residents cannot be blamed. They have already made their feelings known and see no reason to give them over and over again.

No need for more affordable housing in Whalley. RV's Housing Needs Survey gave less than 30 residents in need of Affordable Housing. 50 already given planning permission.
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The number of houses allocated to Whalley should be reduced to a level where they can be accommodated. The village has doubled in size over the last 30 years and will do so again if these proposals are adopted.
House numbers equal to the proportion of the population would help to maintain the intrinsic character of the village community.
Adopt the ratio of 6% of the population to equal 6% of the housing requirement leaving Whalley with a figure of 240 houses for the Core Strategy period.

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Q2  
Name / Name of Organisation (if you are responding on behalf of an organisation) 

Q3  
To which part of the Core Strategy does this comment relate?  
Part of document eg Key statement reference, 'Vision' section etc... 
Ch.4 Development Strategy  
Paragraph No.  

Q4  
As a consequence do you consider the Core Strategy is:  
i) Legally compliant  
ii) Sound *  
Yes  
No  

* The considerations in relation to the Core Strategy being sound are explained in the Guidance Notes

Q5  
If you consider the Core Strategy is unsound, is this because it is not... (please tick the appropriate box)  
Consistent with national policy  
Positively prepared  
Justified  
Effective  

Q6  
Please give details of why you consider that the Core Strategy is not legally compliant or sound. Please be as precise as possible.  

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The Core Strategy is unsound - not consistent with national policy to deliver sustainable development / not justified

The Sustainable Appraisal Report (Non-Technical Summary p.6) considers a proportion of houses for Whalley to be 8% of the total. This equates to 320 houses and not 375 as proposed. (This will leave a residual total of 193 and not 243 - main document p.40) 
(The figure of 9% of the total for Whalley Village equates to 360 houses. The stated number for Whalley in the main document is 375. This error needs to be corrected to the lower figure.)
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The housing number for Whalley should be a maximum of 193 (residual) a number which is already too large to maintain the village as a village, preserve the heritage of the village and avoid intractable infrastructure problems.

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   X
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To expand on the points above

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The formal adoption of the Core Strategy

x

x

x

Q11 If you have any other comments to make on the Core Strategy that have not been covered elsewhere, please use the box below. Please continue on a separate sheet if required.

To expand on the points above.

Q12 Date of completion

14/06/2012

Q13 Signature

[Signature]

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