I am opposed to the preferred option in the Ribble Valley Core Strategy. Clitheroe makes up 25% of the Ribble Valley population but is expected to absorb 46.4% of the proposed new housing units for the Ribble Valley. This is an unfair distribution of the proposed housing development in the Ribble Valley and will put enormous strain on the Clitheroe infrastructure. Although there is an infrastructure plan, it seems to be based on 'hopes and aspirations' rather than any detailed analysis of what infrastructure would be needed to support the proposed increase of Clitheroe population.

Clitheroe currently has a population of 13,200 inhabitants according to the sustainable community strategy [2008] and 15,038 inhabitants according to the core strategy [ONS 2007]. The building of 1,670 new homes equals approximately 4,024 extra people living in Clitheroe or an increase of 30.4% or 26.7% depending on which population figure is used.

The majority of the housing units proposed for Clitheroe in the Core Strategy, are to be built on a greenfield site [The Standen Estate], creating a very large housing estate on the southern edge of Clitheroe. This is anathema to Government sustainability policy in a number of ways which I will outline in detail. The site currently forms a valuable ‘green’ buffer between the town and the trunk route of the A59. It contributes to maintaining the landscape value and vistas of Pendle Hill, which is one of the most distinctive aspects of Clitheroe's location and a considerable attraction to tourists. It has been stated in previous planning documents that it would be detrimental to the landscape to allow the town to 'creep' further up the slopes of Pendle Hill.

The area of Standen Estate is good productive farmland with wooded areas, hedgerows and streams. This attracts a great deal of wildlife including bats, deer, foxes, hedgehogs, hare and bird life including kingfishers, curlews and tawny owls. It is not a good idea to destroy the natural habitats of this wildlife and to prejudice biodiversity. This seems to be the best landscape and farmland that would be destroyed of all the different options originally proposed for future development. Building on or developing prime farmland is the opposite of the Government’s sustainability agenda. It is also being reported that intensive farming practices of the last decades have contributed to significant reductions of bird and insect populations. This means that farming may need to become less intensive and more not less land be required for agriculture in the future.

The Standen Estate area is extremely well used by residents of Clitheroe of all ages for recreational purposes, [it has a green cycle route], which can be evidenced on any weekend or evening throughout the year.

To quote from the Sustainable Community Strategy [p11], ‘Conserve and enhance the environmental quality and natural and man made beauty of the
area’ and from the Core Strategy [p17], ‘The high quality environment of the Ribble Valley is what makes the area so special. It is also what makes people want to live and settle here permanently, what makes them want to work here and what makes them want to spend their leisure time here.’ The proposal to site 34.6% of Ribble Valley new housing on the Standen Estate is incompatible with these key strategy objectives.

Given the importance of maintaining farmland for food production and ecological reasons, it is not a sensible idea to agree a strategy which proposes the utilisation of farmland, woodland and natural habitat for housing and business use.

The Standen Estate option would create a suburban sprawl populated mainly by commuters. Creating this dormitory ‘mini town’ would encourage increased use of the A59 which already has a high accident rate. A decision to develop the Standen estate area will only encourage the incidence of commuting which goes against Government plans and targets to reduce commuter traffic and also goes against its policy to reduce carbon emissions and its sustainability agenda. It will not contribute to the town’s distinctive profile of independent shops, which attracts visitors to the town and defines its character as a currently compact market town in a rural river valley with some sensitively sited industrial units in former quarries.

P82 of the Core Strategy gives key statements of:

- *Proposals which promote development within existing developed areas at locations which are highly accessible by means other than the private car.*
- *Proposals which locate major generators of travel demand in existing centres which are highly accessible by means other than the private car.*

Key Statement DM12 [p71] states:

*New development should be located to minimise the need to travel. Also it should incorporate good access by foot and cycle and have convenient links to public transport to reduce the need for travel by private car.*

- Many parts of Standen Estate will be more than a mile from the centre of town. We cannot see how this will reduce the need for travel by private car as many people will certainly not want to walk to the centre of town and will be unable to carry their shopping back more than a mile. Studies have shown people are willing to walk 300-400 metres for a bus and 600-800m for light rail. So ensuring developments have good connectivity to public transportation and access to facilities are a vital part of sustainability.
According to the RVBC Sustainability Appraisal Report [p2]:

"Energy use in the Ribble Valley is above average and carbon dioxide emission per head are the highest in Lancashire, largely due to the Castle Cement works. There are no major renewable energy schemes."

I do not think that the plan has been "Positively Prepared" nor "Effective" as I do not believe that it has included unmet requirements from neighbouring authorities nor is it based on effective joint working on cross-boundary strategic priorities. Clitheroe is a rural Market Town, not an Industrial Town and industry over the past 200 years has been mostly concentrated in adjacent areas of East Lancashire such as Blackburn, Accrington and Burnley. These areas are better placed to receive new housing developments. It is interesting to note that while there is a surplus of housing stock in these adjacent areas, there are plans to build more housing stock in the Ribble Valley. There has also been depopulation in these adjacent towns and the proposed additional housing units in the Ribble Valley Strategy [2008-2028] and industrial units will be detrimental to these other East Lancashire towns which are already some of the most deprived areas in England as witnessed by the activities of the Prices Trust in Burnley which is closely involved in regeneration activities.

There are no plans in the core strategy to increase public transport. RVBC's response to their strategy is that the Local Travel Plan contains no significant highway improvement. This is amazing given that the proposed increase in housing units in Clitheroe could increase the number of cars by over 2000. Given that 29% of CO₂ emissions in the U.K. come from transportation, and mostly from private cars, how can this be sustainable? Also, Whalley Rd is a DEFRA 'Quality Air Management Zone' due to high levels of Nitrogen Dioxide

This plan is thus not consistent with national policy.

The Core Strategy proposes the building of the Standen Estate on the edge of Clitheroe, to satisfy much of the Ribble Valley future housing needs. The Strategy however makes little or no mention of the increase in services that will be required to service the subsequent increase in population. Services which will need to be increased to give adequate provision but have been omitted from the strategy include:

Health:
- No confirmation that Clitheroe Hospital will be upgraded or developed due to the economic downturn.
- No plans to increase GP's in the Ribble Valley.

Education:
- RVBC acknowledge there are significant implications at the Standen Estate site for education in Clitheroe
- Land at Standen Estates will be available for a primary school but there are no plans to build one.
• The 1,670 new homes in Clitheroe could bring over 300 children of Secondary School age.

• RVBC state there are numerous secondary schools in towns outside the Ribble Valley for Ribble Valley residents. This will be very unpopular with residents of the Ribble Valley and will of course increase the need for car travel, increasing CO₂ emissions and go against the Government’s agenda for reducing the use of the private car and against its sustainability agenda.

This also draws attention to the fact that existing East Lancashire towns adjacent to the Ribble Valley have brownfield sites to develop and existing housing stock which requires re-development. There are also falling school rolls in these areas and the proposed housing development in the Ribble Valley does not seem to have taken account of this cross-border issue. Again, this shows that the plan is NOT ‘positively prepared’ nor ‘effective’.

It is folly to propose a core strategy for the Ribble Valley which takes no account of the circumstances in adjacent areas and sacrifices the current character of this rural area by proposing to meet future housing need by inappropriately sighting large housing estates, such as the proposal for the Standen Estate on the edge of Clitheroe.

**Leisure:**

• RVBC have no plans to fund a new sports Centre.
• No money available to upgrade Roefield Swimming facilities even though it needs maintenance.

In the current economic recession which is badly affecting the N.W. of England, there is already pressure on services such as health, education and leisure.

It seems generally accepted that Clitheroe and the Ribble Valley requires investment in housing to meet the future needs of older residents and some increase of social housing and housing units affordable by young people. These need to be sited in proximity to existing amenities such as shops, transport and schools. This would be in accordance with the Government’s sustainability strategy and the wellbeing of the population. Older residents and young families do not flourish if they are isolated on the edge of towns in a suburban sprawl of new developments.

As a last point I would like to note that although RVBC have been through the process of consultation it does not seem to have taken note of the many comments that have been made which are against the proposed volume of new housing units in the Core Strategy. The consultation process in this instance appears a ‘sham’ in that it has taken place to satisfy a legal obligation rather than being seen as part of a true democratic process of local Government.
I would like to participate at the oral examination.

11th June 2012