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.
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)  N/A

Q3  To which part of the Core Strategy does this comment relate?  Development Strategy Inc. Strategic
Paragraph No.

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

   i) Legally compliant  No  
   ii) Sound *  Yes

* 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.

PLEASE SEE ATTACHED COMMENTS
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.

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  □
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.

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.

Please see attached information.

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
Dear Nigel,

I hope you are well. I'd be grateful if you could review my email here and provide some support for the aspects outlined at the end.

You may be aware of a building sense of unease with regard to proposed housing numbers for the Ribble Valley over the coming years through the Core Strategy process.

Clearly every borough/district needs new homes over the coming years and Local Authorities have an important role to play in agreeing a framework for an orderly accretion of development rather than a 'free for all'. I must also stress that I have no doubt at all that RVBC will have followed due process in making all the required information available. Indeed I spent some hours a couple of weekends ago trawling through the RVBC website to find all of the relevant documents there - not always easy to find everything in one place i.e. inset maps from the current Districtwide Local Plan etc but were all the same.

Indeed I phoned the council for clarification on a number of points recently and talked with Phil Dagnall from Forward Planning (copied in) who was extremely helpful in explaining what has or would happen and answered my subsequent questions. Phil - you've got a tough job and I don't seek to provide you with extra work from this email but wanted to point out how professional and helpful you have been.

I am concerned though that so much development is being proposed for Clitheroe itself and indeed the other main proposed areas. Clitheroe has grown busier and busier over the last 10-15 years and is so different from the town it was not 'that' long ago. That goes with the territory - the Valley is a desirable place in which to live. However, placing a 'strategic' site on the Standen site to the south of Clitheroe to enable a such large development will only add to pressure on the infrastructure on the town. In the Districtwide Local Plan from 1998, this proposed strategic site is designated as 'Open Countryside' and outside of the designated settlement limits of the town. Also in the DLP it states that development in Clitheroe 'must be on sites within the settlement boundary and appropriate to the town size' and 'be in scale and in keeping' - particular comment is made about the risks of 'modern development' on the fringes of the historic town. At the recent Lawstonsteads planning refusal in Whalley for a large scale development, it was quoted that development there would represent an 'urban extension into open countryside' and quoted, amongst many others, policies G1, ENV3, G5 of the DLP. Mention was also made of a field barn on the site and the need to maintain this as a field barn. The Standen site has TWO field barns, plus open countryside (as currently designated in the DLP) and is clearly outside of the settlement limits for Clitheroe based on the DLP inset maps. There are also statements in the DLP about the need to retain public rights of way - particularly those that are well used and to keep these in context wherever possible. Again, in the Standen site there is a heavily used public footpath to Pendleton that cuts right through the middle of the proposed site. I understand that the DLP will no longer be relevant when replaced by the agreed Core Strategy which (after consultation) will change the designation of this area south of Clitheroe.

All future development will be subject to further planning consideration, however, once a strategic site is agreed on within a Core Strategy framework, I can not see many planning objections to future development on the site that will 'ignore' previous designations and planning policies as these will have been 'replaced'.

The planning & development committee only appear to have two councillors who represent Clitheroe - whilst I'm sure they are 'impartial' the other councillors will probably favour any development in the larger settlements that removes the need for future development in the villages.

I believe that RV residents deserve a wider, public forum in order to properly understand and contribute to the proposals. Whilst I was invited by post to comment on Core Strategy proposals when this process was underway, the first I knew of the publically attended meeting last week of the committee was when I read about it the day after in the Advertiser.
We seem to be under the impression that we 'have to' agree to large scale development or it will be imposed on us by Government - what are the facts here Nigel? I have read much about the subject in the national press but whilst it seems to be quoted that communities can decide on the future for their area, I can't see this in action locally other than it being quoted that we can 'look at the RVBC website' or send in a letter re the proposals. I believe we need an inclusive, large scale forum locally to fully inform interested parties in the area and ensure that everyone has the opportunity to express their democratic opinion. In the pack provided to councillors recently with regard to the Core Strategy, letters from individuals were quoted in respect of numbers and summary views (but no real content) whereas each representation from business i.e. Carter Jones/developers etc were quoted individually and in some detail.

Please let me know what we can do to

a) clarify exactly what communities are able to do in respect of determining the scale of future growth i.e. clear up any misapprehensions about what will or will not be 'imposed' by 'Government' if any local authority does not come up with 'required' numbers.
b) enable a very well publicised and open/inclusive local forum to enable all views (in favour or not) to be heard and listened to in a way that is fully inclusive and not restricted by capacity or lack of well advertised forward notice as was last week's meeting.

In so many respects I am pro development as it is essential for future growth, but I do have concerns over the scale and siting of the proposals which, if progressed, will hugely increase in percentage terms the population and housing stock of Clitheroe.

I look forward to your reply in due course

Kind Regards

[Signature]
Clitheroe resident (in a modern home on a brownfield site)!
and party member.
I submit these comments in a personal capacity and make reference to my earlier email submitted to Nigel Evans MP and Phil Dagnall, a copy of which is held by your department. You have confirmed in earlier correspondence that these comments are 'within time' due to my earlier submission and the delay in a reply being forthcoming.

I wish to comment on a number of aspects about the Core Strategy proposals. In principle I accept the need for development. My key objection is around the scale of the strategic site proposals following the change of preferred core strategy options by the council.

My comments mainly relate to the sections relating to 3.11, 3.12, 3.13, 3.14, 3.16, 3.18, 4.3 and 4.11.

The land identified by the Standen Estate Trustees and RVBC as suitable for a strategic site is currently agricultural land wholly outside of the existing settlement boundary. Development on this site will constitute an urban extension into open countryside which would change the character of this swathe of countryside to the detriment of the visual amenities of the area. As such it would constitute a modern development on the fringes of a historic town and importantly, due to its scale, not be appropriate to the town’s size or form (not in keeping). Within the site are important landscape features such as the Roman road and two field barns, a number of well used footpaths and important views of Clitheroe Castle and Pendle Hill that will be detrimentally altered by the scale of this development.

The strategic site come from 'Option D'. In 4.3, RVBC note that this was not the initial preferred option (being elements of Options B and D). RVBC have changed the preferred option due to the approach from the Standen Trustees.

RVBC acknowledge that there are three main concerns with their preferred 'Option D' whereas 'Option B' only had one main concern aligned with it, why then the change here, perhaps an easier option has been picked due to the recent availability of the agricultural land at Standen?

Due to this, we now face an unsustainable volume of development on one site and at odds with the initially preferred option that sought to balance the volume of future development though the key settlement areas of Clitheroe, Longridge and Whalley. Indeed from the table within 4.11 we see that Clitheroe will take 348 houses plus 1040 at the strategic site. The strategic site however is not distinct from Clitheroe as mentioned above but instead will form development contiguous with the town so the allocation of development to Clitheroe in this period is actually 1388, a number that constitutes a huge % increase for the town in comparison with the proposed numbers for Longridge and Whalley. This imbalance not only causes pressure on Clitheroe, it also does not assist in the authorities' key objectives of 3.16 to ensure that retail development is vibrant across the borough as it will inevitably boost trade in Clitheroe to the detriment of the viability of nearby towns and importantly, villages.

This imbalance also does little to address 3.13 and 3.14 where we want to 'meet local needs'. As RVBC acknowledge, the Ribble Valley is a net gainer of 'aspirational' inward migrants i.e. we already find that a large % of the demand on housing is from families wishing to enjoy living in the valley [LDF evidence base documents]. This is an issue when employment is not based in the Valley and the continued under
development of the business park at Barrow has shown that few new valley based employment opportunities result in a large number of commuter journeys out of the valley each day making the town increasingly a commuter town. We should not base provision need on inward aspirational demand, particularly not where this is out of balance with the existing population centres in the borough. We will always need to find sites for more housing with an NPPF that presumes in favour of development. This though needs to be proportional to local need and the siting of so many new homes on the proposed strategic site is out of proportion and needs to be refined to reduce the provision on this site and spread development through the borough through a dispersed pattern settlement. The table in 4.11 seeks to demonstrate that development is dispersed but this is not the case once the numbers for Clitheroe and the strategic site are added together.

Other difficulties with this strategic site include -

- the use of high quality agricultural land for an inappropriate scale of development on one site
- the lack of green wedge provision to safeguard important views and aspects
- a potential drainage issue with the volume of development putting pressure on the ability of the existing agricultural land to absorb rainwater. Pendleton Brook will need to take a large volume of extra run off as a result of increased hard surfaces and roads and extra provision for this may have to be made to avoid problems on the site or downstream.
- the addition of a new roundabout on the A59 and at the entrance from Pendle road to the development will put increased pressure on the surrounding road network. Whilst the provision of a roundabout at the Pendle Rd/A59 junction will be safer than today's solution, this will also increase the journeys from the A59 using Pendle Rd and the suggestion from Taylor Young on behalf of the Standen Trustees that the development should also link through to Littlemoor would create huge traffic and safety issues. Any development on this site needs to be distinct and should not connect with surrounding roads to prevent rat runs and 'new routes' from the A59 to parts of the town.
- most development within or on the edge of towns presumes that there will be a high volume of foot and cycle journeys, however due to the topography of the strategic site, this will be unlikely so extra provision would need to be made to cope with the scale of development.
- the lack of a development management plan means that we currently have to rely on plans submitted by the Standen Estate Trustees, this is not helpful to the process and apart from small changes to the total housing provision proposed for the site, their submission seems to be being adopted in its entirety.

To ensure a balance of development across the borough I believe we should apportion future development based on existing settlement ratios. The preferred option does not do this.

If a core site has to be part of the solution, then the land to the west of the roman road should not be developed at all to prevent coalescence and retain the currently recognised essential open spaces around the grade II listed buildings at Littlemoor. The remaining development proposed between Standen Hall to the south and the playing fields/ Shays Drive to the North should be significantly reduced in scale to protect the biodiversity of the site, retain some agricultural land and seek to protect visual and recreational amenity through careful protection and enhancement of the public footpaths that cross four of the fields proposed for development. Any site access to this reduced site must be solely from Pendle Road and not linked to other routes in the town to ensure that traffic flows in and out of the new roundabout proposed on the A59 and not towards or away from other access points putting increased strain on the wider town. Taylor Young drawing 13 proposes a primary route from the site to Littlemoor, this surely cannot be under serious consideration.

In summary I do not believe the strategy is 'Justified' in that it is not the most appropriate strategy and other alternatives were under consideration, are possible and were preferred before the submission from the Standen Trustees and this now places an unreasonable proportion of future development in one settlement area of the borough (namely Clitheroe). Development needs to be dispersed to reflect current settlement volumes and to ensure the future viability of all of our valley communities.

If required I will happily take part in any oral examination should it be deemed desirable. I would like to be kept informed about the submission of the Core Strategy, the publication of the Inspector’s report and the formal adoption of the Core Strategy.
Yours faithfully

18/6/2012

Sent from my iPad