I am making this response via email because the PDF form is not interactive and so cannot be completed and returned electronically.

According to the guidenotes, the Inspector will "...assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound..." as judged by the degree to which it meets the following four criteria:

- Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Comment - I think this is where the strategy is weakest because there is only tenuous evidence of objectively assessed need. Most of the evidence presented in this regard is aspirational rather than evidential. The economic drivers for the borough are largely external and though that is acknowledged much of the resulting argument supporting development within the borough is based on uncorroborated assumptions about the economic success of neighbouring areas. While Clitheroe is clearly the hub of the borough it is not thriving economically and a number of statements about its regeneration appear to be of the nature that because x number of houses will be built and y people move in the result will be an increase in local economic activity (rather than simply increasing the numbers of economic commuters). A similar argument could be made for Longridge, but the assumptions that Whalley is a service centre is only true in the sense that it has a number of pubs, dentists, doctors, hairdressers and bridal wear shops - in order to purchase most staples the residents have to go to the supermarkets in Clitheroe, so, increasing the number of houses also increases car journeys for the most basic of purposes. Whalley is a dormitory that has lost its geographic coherence because of developments such as Calderstones that altered the shape and balance of the community without in any way adding to the community amenities. Further development in Clitheroe and towards Barrow are further examples of major development that shift the centre of gravity of communities without, so far as I can see, recognising the profound impact they will bring such that, if all the developments noted were to go ahead, the A59 would be the backbone of a diffuse urban area running from Clitheroe to Billington by way of Barrow and Whalley. If this is the strategic intent of the council, sobeit - but the signal weakness of this strategy is that it considers the several parts of the borough like individual pieces of a jigsaw without ever examining the picture that will result when all the pieces are put together.

- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Comment - Much of what I said above applies here with the additional caveat that 'most appropriate' is a relative phrase in that only a very narrow range of options have been presented for consideration.

The most signal weakness for me is that I see no evidence that the strategy considers what the residents might consider important. It is a top-down, centrally imposed plan that has no genuine popular vision. The evidence as presented is therefore disproportionate.

- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Comment - how can you judge future effectiveness? Houses can be built and people be found to live in them as long as this area is perceived to be a preferable environment, which is presently the case, There can be no guarantees that the current external economic situation, over which the council has no control, will not change
either for better or worse - therefore any assessment of future effectiveness ought to be informed by a robust risk assessment: all I could see was much consideration of the upside - what about the downside risk?

- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Comment - I return to my jigsaw analogy. So far as I can see the strategy says all the right things and makes all the right noises with respect to the statutory duties imposed on the council. National policy planning and implementation is a top-down process in which there seems to be very little room for creativity and innovation at local level. To that end I commend the council on what must have been a hugely complicated and expensive process. Frankly I think it would have been much quicker and cheaper had it been a bottom-up process.

I doubt that my comments will be of interest to the inspector, but I felt angry enough to need to make them. We the people of the Ribble Valley ought to be far more involved in the creation of these sort of plans: however messy and argumentative such a process might be, it would at least be more democratic than the process we have been presented with.