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)

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

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.

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.
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 SEE ENCLOSED

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 ENCLOSED

Q12 Date of completion

12/06/2012

Q13 Signature

[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 Sirs

Core Strategy Consultation

Further to your letter of 3 May 2012, I make no comment on the legal compliance of RVBC local housing proposals, but question its soundness on the grounds that it is not justified. I re-submit the representations I have already made to you in previous communications, and so that you can present these for consideration by the Secretary of State’s Independent Planning Inspector, I enclose copies, should you not have retained the originals. I also again emphasise the following:

(1) Large scale development within Ribble Valley and especially in Clitheroe will have substantial disruptive and unjustifiable effects:

a) Large increase in vehicle numbers aggravating existing congestion and parking problems and further increasing noise and atmospheric pollution.
b) Increased demands on the provision and funding of education, health and social services facilities and resources.
c) Upheavals associated with significant transport and infrastructure reinforcement and increased capacity in water, electricity, gas, communication and waste utility requirements.
d) Detrimental effect on visual amenities by allowing development of suburban sprawl, irreversibly altering the nature and character of the locality.
e) Unacceptable destruction of natural habitat and consequent loss of local wildlife.

(2) As there is already an excess of non-affordable, and a shortfall of affordable homes in Ribble Valley, this imbalance needs to be redressed by prioritising the provision of the latter, especially aimed at younger people to help improve and maintain the age profile.

(3) Extensive open market development, as proposed in the Borough, will attract inward migration of families, whose children in due course, as young adults will themselves require affordable housing, thereby self-perpetuating this already severe problem. Therefore open market development is not justified and should be minimal.

(4) Economic and employment development should be controlled and linked to the provision of affordable housing in an attempt to match jobs to labour resources to reduce commuting and retain local people of working age within the Ribble Valley.

(5) Although the Borough is largely rural in nature, there has been relatively little reference on the website to supporting rural communities and the only mention of farming, a major occupation in the area, has been that it causes

Cont’d.....
pollution. This may occasionally be so in a small number of isolated cases, but another thing it causes is food to be put on people’s meal tables. This important aspect is often casually overlooked when carelessly contemplating concreting large areas of high quality productive agricultural land. This is unjustifiable and must not be allowed to happen here.

RVBC should not continue down the path of least resistance by simply acceding to the vested interests of the few and allowing the avarice of landowners and developers to prevail. In its involvement with the Secretary of State’s Inspector the Council should keep clearly in view the basic wishes of a large proportion of the local population who have made it clear that they do not want large scale development in the Ribble Valley and Clitheroe in particular.

If it has the will the Council can prepare a strong case, accurately reflect those wishes and robustly defend the best interests of local people in the true spirit of the ‘Localism’ advocated by the Government, that is, the implementation of the wishes of people to determine their own future and environment, through and with the assistance of their representatives in Local Government.

Yours faithfully

[Signature]
Dear Sirs

Ribble Valley Housing Development Options

In response to your invitation for comments from the public I make the following.

The 1951 Census gave the population of Clitheroe as 12062 and by the 2001 Census it had risen to 14697, an average annual rate of increase of 53. Figures available for 2010 indicated the population had reached 15024.

The addition of approximately 1500 homes as proposed, for example, in Option D might increase the population by 4500 in 20 years, an average annual rate of increase of 225, more than 4 times as fast as in the previous 60 years! While past events do not necessarily determine or influence the future, this large, sudden and conspicuously disproportionate increase questions the accuracy and validity of the projection which produced it, and as no definitive evidence seems to have been provided to substantiate the projection of 3220 new homes in total, (161 p.a. over 20 years to 2028, of which 233 are built), this figure appears far in excess of what is needed.

In particular 1500 new homes in Clitheroe would increase vehicle numbers by at least as many, and the population by about 30%, requiring proportional increases in health, social services and education provision, with substantial infrastructure changes and would further exacerbate congestion, parking and pollution problems.

These are large effects and would completely change the nature and character of the town, the local environment and visual amenities in a detrimental and irreversible way.

There is however no doubt a need for sheltered housing, retirement homes and importantly affordable homes, the latter to attract younger first time buyers/tenants, amongst other reasons, to help prevent the population ageing disproportionately. However it appears that only 30% of the proposed homes are to be designated ‘affordable’ – nominally defined as having a price/gross earnings ratio of 3.5. From the Councils own statistics, in all 24 wards across the Borough, the mean price/mean household income ratio varies from 4.4 to 12.7.

It is obviously apparent there are already a large number of ‘non-affordable’ homes in the Ribble Valley and it seems irrational and unnecessary to add to these a further 70% of the 3000 plus proposed. The development therefore needs to be drastically scaled back with perhaps the 30% of 3000 affordable homes built in addition to retirement homes requirements.

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Some of these affordable homes should perhaps be in the villages, many of which could probably accommodate 15-20 homes to support the local indigenous population and to help prevent villages becoming (even more) dormitories to affluent commuters. Affordable housing should of course also be provided elsewhere when a need exists, maintaining as far as practicable a balanced mix of properties and residents.

Another consequence is the amount of land that would be consumed if large scale development is allowed. It is widely accepted both outside and within scientific circles that climate change is taking place leading to unpredictable and extreme weather events, resulting in failure/destruction of crops and harvests, causing supply shortages of essential food commodities. It is predicted that these events are likely to increase in frequency and severity in the future and already there has been evidence of this happening in the recent past as scarcity in supply of grains and rice has forced price increases.

Populations in certain parts of the world continue to escalate and life expectancy across the globe is increasing. As ever increasing numbers of people in developing countries aspire (rightly or wrongly) to a Western diet and lifestyle, demand and competition for food are also predicted to escalate. The days of relatively cheap and secure sources of food may be numbered, with the cost of imported food especially likely to increase. It may be necessary in future to become more self sufficient by increasing home food production.

Obviously a square kilometre or so of land around Clitheroe will have a minute effect on world food supply, but what is largely good quality agricultural land is an invaluable asset for the future and should be preserved for food production. Many consider this an important principle which without undue delay should be adopted, implemented and adhered to both locally and nationally.

To tarmac and concrete over large tracts of productive agricultural land looks like thoughtless vandalism and the Council should act responsibly to prevent this happening.

Instead development should be on a much smaller scale making use of areas already developed, derelict, ‘brownfield’ and unproductive land. It should be spread across all communities in a proportionate and equitable way, bringing real benefits by taking a thoughtful, appropriate, imaginative and innovative approach, not by taking the easy option of acceding to large scale suburban sprawl, where the main preoccupation is likely to be the bottom line.

A further detrimental effect of a large development would be destruction of habitat and loss of wildlife in the area. For a number of years farmers have been paid grants in certain circumstances to set aside areas of land, sometimes modified by planting etc, to generally improve the environment and

Cont’d…..
provide habitat and protection for a wide variety of wildlife, in a land stewardship scheme. It seems bizarre that public money should be made available by Central Government to protect the environment when Local Government decisions could allow its destruction through inappropriate development. I hope RVBC will not allow this to happen.

In conclusion, people may want to live in the Ribble Valley, developers may want to maximise profits by building here, but wants are not the same as needs and are certainly not a reason why they should be accommodated. If this large scale development is allowed to go ahead it could easily be for the wrong reasons. There will be very large amounts of money involved, some will have their own motives and agendas, developers will be queuing up and many others will also have an eye to the main chance.

This has all the appearance of a money making exercise which would greatly benefit relatively few to the detriment of the many, the locality and the environment. Ribble Valley Borough Council should not open the flood gates.

To summarise therefore, I am totally opposed to Options D and E but would favour a much scaled down version of Options A or B but with the flexibility of incorporating some aspects of Options 3 and C where advantageous and appropriate.

8 August 2011
RVBC
Church Walk
Clitheroe
BB7 2RA

FAO Head of Regeneration & Housing

Dear Sirs

Ribble Valley Housing Development Options

Further to my previous comments I add the following in relation to scenarios A – H regarding housing number requirements.

Prophesying the future is a nebulous concept and in recent years there has been much evidence of both Central and Local Government, advised by consultants, embarking on ill conceived schemes which have later proved impractical and had to be abandoned. This has often resulted in financial mayhem wasting countless billions of tax payers money, and illustrates that consultants can often get it wrong. Over 20 years there may be many events and circumstances that are unforeseeable and therefore cannot be accommodated in any plan. NLP consultants conjectures are not written in stone and need to be viewed with circumspection.

In most of the above scenarios the figures appear to have been inflated by over ambitious economic growth targets and an apparent insistence that only 30% of new homes should be ‘affordable’.

An effective way to reduce the total number of homes required would be to ensure that after retirement/sheltered housing needs are met, instead of 30%, almost all are ‘affordable’ thereby not adding a further 70% of those built to the already excessive pool of ‘non-affordable’ homes.

It is clear that buying or renting homes will become increasingly difficult for younger people and every effort should be made to assist in enabling them to remain in the Ribble Valley, rather than build houses that encourage an inward migration of the affluent. Reducing the tendency of outward migration of the young would help to maintain the number of people of working age and with managed economic development it should be possible to achieve a reasonable employment balance and minimise commuting. It would also assist in maintaining a balanced age profile within the Borough, although, as will be reflected nationwide, the proportion of older people will probably increase due to extended life expectancy.
Over inflated economic growth ambitions, if realised, would encourage excessive inward migration and increased inward commuting as indicated in scheme F, and it is difficult to see any beneficial effect from this.

Future house building based on scheme E, and to a lesser extent, on A and D, may be misleading as the largely artificial boom in the 12 years to 2008 resulted in false conditions prevailing. As is well known this was based on the shifting sands of consumerism fuelled by easy credit, irresponsible lending, excessive borrowing by governments, banks and individuals, resulting in an explosion in house prices and other bubbles in the economy, with much of society living beyond its means, and finally culminating in the financial crisis. Now that economic reality has set in, the realisation is dawning that future growth may be slow and sporadic as the competitiveness of the Western nations is eroded by debt, so that it may be anything up to 10 years before the economic levels of 2008 are achieved again.

Past housing development as in scheme G does not appear to have much relevance to what could or should be achieved in the future, and similarly, as the RSS mentioned in scheme H is to be abandoned, this also has diminishing relevance. Scheme C is probably too low to be realistic.

This leaves natural change as in scheme B, and while this implies anything else is unnatural, engineered or manipulated, it is probably reasonable to increase the figure to an average of say 120 pa to allow some additional degree of flexibility, and if a reduction in the number of vacant and second homes can be achieved this may increase the effective figure to an average of 150 pa of mainly affordable homes.

Taking all the above factors into account an alternative approach therefore would be to allow the Ribble Valley to grow and develop from within in a more natural and organic way, with an approach to economic development that aims to balance labour resources to employment opportunities, with the further objective of reducing inward migration and minimising commuting.

An additional benefit of organic type growth is that infrastructure can develop in a similar measured way, gradually increasing the capacity of health, education and social services, and strengthening transport and utility capabilities without the need for huge construction projects and drastic upheavals.

The Council should not commit to the strait jacket of a fixed number of homes each year, thereby avoiding becoming locked into a dogmatic approach to what the future should be, but instead cultivate a flexible and agile strategy enabling it to adapt quickly and effectively to changing conditions as they arise over time and the economic cycle.

In accordance with the Governments policy of ‘Localism’ and stated intention to devolve more power and decision making to Local Authorities, that is, to the local people they represent, the Council should abandon the policy, rightly or wrongly, perceived in the past of acting in an arbitrary and unilateral fashion.
Instead it should adopt the basic principle of not only listening to, but acting upon the wishes of local people, who are in the best possible position to know what they want their future environment and quality of life to be like. The Council's consultants may input numbers into various computer models that will output some more numbers, but crucially, these organisations have little actual knowledge of the area and no local affinity.

While other communities in the Ribble Valley may make their own representations, as a Clitheroe resident in particular, I reiterate the points made in my previous communication to you and I hope you will act responsibly and not allow the attractive market town of Clitheroe to be disfigured by the ugly smear of urban sprawl or its desecration to yet another bland commuter/dormitory town.

Yours faithfully

[Signature]