

Philip Dagnall

From: Andrew & Sally Smith [as1200@btinternet.com]
Sent: 11 June 2014 20:01
To: Post Hearings
Subject: Post Hearings May 2014 - Ribble Valley Core Strategy 2008-2028 - comments on proposed Main Modifications

To Whom It May Concern:

I wish to respond to this latest consultation on the Core Strategy following the publication of proposed Main Modifications to Submitted Core Strategy as notified in letter date 16th May 2014. Further to my previous submissions I still believe that the central aspect of the strategy – a strategic development site of 1,040 dwellings – makes the whole plan un-sound. This is for the following reasons:

- 1) The size of strategic site is too large relative to Clitheroe.
- 2) The response to the outline permission request for 1,040 dwelling (strategic site) from Natural England was that the site is too close to an AONB. However, the council claim that they have taken account of the AONB in their proposed changes - "In allocating development, the Council will have regard to the AONB,...." (as per modifications table MM6). If the council had indeed taken due regard then they would have noted Natural England's response and sought to remove or significantly reduce the development planned on the strategic site at Standen.
- 3) Another change at this late stage to the housing provision, increasing a further 12% from 5,000 dwellings to 5,600 (MM15). This is the second increase – the first being 25% from 4,000 to 5,000 dwellings which occurred at the previous consultation to this one.
- 4) The delay in agreeing the Core Strategy seems to result in a complete disregard for the number of houses passed for planning since the start of this process and thus instead of these been deducted from the required total, they are simply added on. This is demonstrated by the change to the end date used for calculating the number of houses in supply which has been changed at each consultation and is now 31st March 2014 (MM8, MM14 & MM17). This demonstrates the un-soundness in the Core Strategy and this consultations process because it results in more houses been built than were originally proposed at the start of this process and thus is a moveable feast on what is the primary issue – 'the number of houses to be built from 2008 to 2028 in the Ribble Valley'.
- 5) A total disregard for the sheer scale of Ribble Valley and the number of villages within its boundaries. The proposed changes suggest development outside Clitheroe, Whalley and Longridge will equate to 45 dwellings per settlement (MM15). Some villages, like Slaidburn could take considerably more than this. The end result would be that the required number of dwellings spread throughout the Ribble Valley would mean doing without the Standen strategic development site.
- 6) No account has been taken of the shortage of Secondary schools. Of the two state Secondary schools in Clitheroe one is beyond its capacity (Ribblesdale) and one is only available to a select few (Clitheroe Grammar).
- 7) The strategic site is not a balanced development in proportion to the Ribble Valley geographical area. It is too large a development in one location.
- 8) The strategic site reduces amenity and recreational land – 'green spaces' – vital to providing a desirable location to live in and being so close to an AONB, it has a detrimental impact on the area and will significantly diminish the quality of life for residents within Clitheroe and the surrounding

area.

- 9) Council services provided in Clitheroe – swimming pool, parking, medical services, etc. are already at capacity. A development of this scale will only compound this problem. There are several different sites in Clitheroe (i.e. Henthorn Road, Primrose Mill, Waddington Road, Low Moor, Clitheroe hospital) which have either had planning approved or are in the process of obtaining planning adding 1,223+ new houses (according to appendix 2 table). Thus why is this large “strategic site” needed? Or can it at least be reduced by 50% or more to account for these other extra houses now in the pipeline.
- 10) Although it is acknowledged that the Section 106 agreement within the recently approved outline planning permission for the proposed strategic site provides for money to be paid to support bus services, pupil places and sports facilities this will be insufficient in the long term when the money is spent. It allows for provision for bus services for 10 years thus falling well short of the expected life of the houses to be built on the proposed strategic site. It is thus financially unsustainable to propose such a large site which will have a long term financial demand upon Council services which are already stretched to their maximum to meet the needs of the current population.
- 11) The strategic site could take 10 to 15 years to complete and would only be undertaken by a large scale, national house builder due to the infrastructure costs. Thus not only could the required 5,600 dwelling target be achieved quicker if smaller developments were spread around the Ribble Valley but that the local economy would benefit as the profits would be spent locally by local builders rather than taken out of the area.
- 12) The strategic site was only a few years ago ‘green belt’ designated and it is still made up of green fields farmed by a 3rd generation farming family. The modification to Policy DMG1 (MM47) states that previously developed sites should always be used instead of green field sites where possible. Please could this firm intention be applied to the rationale behind the location of the proposed strategic site and thus non-green field sites scattered throughout the Ribble Valley be used up first and completely before any green field sites are used to be build houses on.

Therefore in conclusion, I object strongly to the Main modifications of the Core Strategy changes seeing them as unreasonable, unsound and not being based on the local evidence. There is a clear need for housing on a moderate, geographically spread scale but not for a large 1,040 dwelling strategic site. The detrimental impact of such a site on the local services, traffic, roads, and quality of life for local people could take years to resolve and at a greater financial cost than if the burden of more housing was spread throughout the Ribble Valley.

Please confirm receipt of my submission.

Yours sincerely,

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