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CLITHEROE RESIDENTS ACTION GROUP

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30th May 2014

Dear Sir/Madam

The thoughts of CRAG have not changed from those made at the previous consultation stage in September 2013. These objections are included below.

We would make these further observations.

The re-vamped Core Strategy would appear to be a 'done deal' as it has been tailored to suit the inspector's recommendation of more housing. Like most residents of the Ribble Valley we were against 5,000 houses so we are hardly jumping for joy at the prospect of 5,600.

This situation makes a mockery of 'Localism'. We had more of a say on issues affecting our community before this word was introduced. You prefer to go on the recommendations of someone living hundreds of miles away, developers and landowners seeking to line their pockets with gold instead of listening to local people.

You insult our intelligence by calling this process 'consultation'. You will not listen or act upon our views. This is purely a box ticking exercise and as such the objections below are submitted again so you can dismiss them again.

Finally the heading you use 'A local plan for Ribble Valley' adds insult to injury. This is not a local plan as locals are against it!!!

Regards

Steve Rush

Core Strategy Changes Consultation 2014

Dear Sir/Madam

I am writing as Chairman of CRAG regarding the revised Core Strategy public consultation. CRAG considers the implementation of this revision will have serious consequences for Clitheroe and the entire Ribble Valley. You are already in possession of our objection to the initial plan and these are further observations.

The initial Core Strategy produced a new housing recommendation after a Nathaniel Lichfield report **assessed 9 different scenarios**. These included projected changes to migration, population, household growth & employment growth. Jointly those assessments produced a housing requirement range of 190dpa to 220dpa. **RVBC elected to include 200dpa in the original Core Strategy**

NL revised their report in line with current Census and Office of National Statistics information earlier this year. They re-assessed the previously used scenarios headed migration, population and household growth. This revealed **fewer houses are required in the RV**. Three new demographic scenarios also indicated **dwelling requirements are significantly below previous household projections**.

NL found the projected level of **household growth was 25% lower** than previous projections suggested. The **Census estimates Ribble Valley will grow by 8.8% by 2028**. Both the Census and NL's household growth figures suggest the Ribble Valley does not require anywhere near 250 or 280 houses.

You have now selected an **employment led scenario** to determine housing numbers. However, in 2011 **this category was excluded from NL's calculations because it was classed as unrealistic**. Somehow in 2013 this category became realistic and **100 new jobs per annum** were conjured up and assessed. This revealed 280dpa and RVBC have included 280dpa in the revised Core Strategy. This new housing number is derived from, and solely reliant upon, employment projections. This bears no resemblance to the initial calculation of housing numbers in the original document and prevents a comparison being made.

This type of calculation appears to suggest the methodology for determining the required housing numbers has been conducted in reverse. It suggests the starting point was 5,600 houses, and by working in reverse, the extra 1,600 new Ribble Valley employees were the result.

Locally hundreds of people objected to the initial Core Strategy containing 4,000 houses but the revised version has been increased to 5,600. Over 2,000 Clitheroe residents signed a petition objecting to 1,700 houses. Under this revised plan the town is now expected to build an extra 365 properties making the total 2,065. There has been no public consultation when arriving at these figures. The small amount of previous public consultation was dismissed when these figures increased.

The Service Centre Health Check revealed:

- All service centres are **constrained by their historic street layouts** and development density.
- Many local residents **commute out of town** for work.
- **Traffic congestion** can sometimes be a problem.
- **Car parking is identified as a priority issue** which should be addressed in the town centres
- Traffic movements can diminish the visitor experience

The above is the current position within the proposed service centres. Building another 5,600 houses will **increase** these already problematic areas. It is also noted that the RVBC Core Strategy **does not include plans to improve highway issues or provide extra car parking places anywhere in the Ribble Valley**. This contravenes the NPPF.

NL has recommended **any figure above 250dpa would have to be considered seriously**. Specifically, in the context of the rural and policy-protected nature of the Borough and against RVBC objectives for respecting, protecting and enhancing the environment, biodiversity and character of the Borough.

Included in the revised plan is 160ha of land to build **6,294 dwellings** as a 5 year supply. This exceeds the NL recommendation over the life of the Core Strategy never mind 5 years. Sufficient land has been set aside within SHLAA to build **14,717 houses**. This has increased from 10,000 houses and **also massively exceeds the above NL recommendation**.

Point 9.4 refers to Barrow as a Key Service Centre. The village has one primary school, a public house and a Chinese Restaurant. No train station, library, shops, Secondary School etc - hardly a "Key Service Area". This title gives the impression Barrow village is bigger than it is - very misleading and potentially damaging. This title should be removed from the document and Barrow included with the 'villages total'.

Whalley is a village not a Town!!!

The Strategic Housing Market Assessment states Ribble Valley requires the following type of houses. 2,619 Open Market, 235 Shared Ownership, 694 Affordable Rent & 202 Social Rent. This totals **3,750 houses or 208dpa**. RVBC are **not including Social Rented Housing** in the revised plan despite the need highlighted by SHMA.

The SHMA regards 3,750 houses as the figure the Council should plan towards **in accordance with the NPPF**. In arriving at 3,750 houses the Strategic Housing Market Assessment advises RVBC should take into account a range of factors; including the availability of suitable sites for housing development, the number of **vacant properties** available to help meet future demand the **environmental impact of potential development** and how future housing development will **impact on other infrastructure**. On 1.4.11 there were **906 empty houses** which RVBC should take into account. Infrastructure and environmental issues are highlighted later.

Hyder Consulting prepared a sustainability appraisal for 5000 new homes and consider an increase of 395 houses in Clitheroe may place even **greater pressure on congestion, air quality and primary school places**. They state that the **Standen development**, is expected to have a **greater environmental impact than the original option**, in

terms of the effects on landscape and the natural environment as a result of lost greenfield land. These effects may be visible from the Forest of Bowland's Area of Outstanding Natural Beauty.

Hyder consider there are currently **traffic congestion issues in Whalley and a lack of school places**. The increase in proposed development would put **greater pressure on these issues** although **a further 88 homes over a 20 year period may not prove significant**.

More significantly both Hyder Consulting and Nathaniel Lichfield highlight environmental issues by building more than 4,000 new properties in the Ribble Valley. Nathaniel Lichfield state in their original 2011 assessment:

- It was considered between **190 and 220** new houses represented a **sensible range** for the Borough, providing a **realistic level** of housing to deliver economic growth, whilst recognising **environmental issues** and the challenges ahead.
- Combining outputs from various models and set against the **environmental issues and constraints** that could **preclude the Borough from physically accommodating higher levels of housing**.

Hyder Consulting state in their revised 2013 assessment:

- **The additional 1000 homes across the Borough has potential to cause a degree of erosion to natural resources and the landscape.**

RVBC are proposing a 40% increase to Core Strategy housing numbers. The Census, Hyder Consulting, Nathaniel Lichfield, the Service Centre Health Check, the Strategic Housing Market Assessment and Ribble Valley residents disagree.

Taking account of the Census, NL's Household Growth and The Strategic Housing Market Assessment no more than 220dpa is **considered necessary**. Other than the unreliable employment assessment there are **no other suggestions the Ribble Valley requires 5,600 houses by 2028**.

Even more concerning are Nathaniel Lichfield and Hyder Consulting's strong comments that if more than 4,000 houses are built in the Ribble Valley it could have a **serious impact on the environment, erode natural resources and the landscape**.

CRAG and members of other Ribble Valley action groups do not consider this Core Strategy is justified and has not been Positively Prepared. We do not believe it passes the test of soundness due to the reasons highlighted in this letter. Could you please keep me up to date with information on this subject as and when it occurs.

Yours sincerely,

Steve Rush
Chairman Clitheroe Residents
Action Group

