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Working locally and nationally for a
beautiful and living countryside

6 July 2014

Dear Colin Hirst,

The Campaign to Protect Rural England Lancashire Branch is writing with comments in response to your letter concerning the Ribble Valley Proposed Main Modifications, May 2014.

CPRE Lancashire welcomes many of the proposed modifications as they bring clarity, and therefore strengthen the Local Plan function to enable sustainable development. We set out more detailed comments in Annex 1.0.

We remain concerned that the housing figure of 5,600 dwellings from 2008 to 2028, which equates to 280dpa, is too high. And, we draw your attention to the recent announcement concerning the downgraded population growth estimates by the Office of National Statistics, which is likely to require a reduction in predicted housing numbers for your local authority local plan making purposes.

The 2012-based Subnational Population Projections for Local Authorities in England is available at the following link where further relevant information and the full datasets, specific to Ribble Valley, can be found: <http://www.ons.gov.uk/ons/rel/snpp/sub-national-population-projections/2012-based-projections/index.html>

However, as acknowledged in our earlier letter dated 20 September 2013 we are most concerned that Ribble Valley Borough Council will ensure sufficient housing land is identified to satisfy objectively assessed need and ensure that it does not fall foul of the Government's National Planning Policy Framework (NPPF) five-year housing land supply rule as defined by Paragraph 47 to 49.

We do hope the Local Plan can be found sound without delay to enable some policy protection for Ribble Valley's rural places, which in the absence of a plan have been at the mercy of volume house builder who have sought 'off-Local Plan' countryside sites rather than reusing brownfield land first.

If you require further information please do not hesitate to contact me.

Yours sincerely

A large blacked-out area redacting the signature of the sender.

Patron
Her Majesty The Queen

President
Sir Andrew Motion

Branch Chairman
Andrew Harris FRICS FCIM

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Annex 1.0.

1. Inclusion of policy wording in Key Statement DS1, 'in allocating development the Council will have regard to the AONB, Green Belt and similar designations when establishing the scale, extent and form of development to be allocated under this policy. The relevant constraints are set out as part of the strategic framework included in this plan', is beneficial.
2. The explicit reference in Policy Key Statement EN3: Sustainable Development and Climate Change to the current Code for Sustainable Homes, Lifetime Homes and Buildings for Life and BREEAM standards will help to improve the low carbon credentials of new development.
3. CPRE Lancashire is also pleased to see Policy ENV4 is improved by the alteration 'a net enhancement of biodiversity'.
4. We are pleased that Key Statement H1: Housing Provision has a 'plan, monitor, manage' approach is to be adopted with regular reviews.
5. The additional text concerning land allocation to reflect what is needed, environmental issues and infrastructure gaps is a positive policy change and will ensure social and environmental factors are more fully addressed by the Local Plan.
6. CPRE Lancashire agrees with the proposed modification concerning Chapter 9 and heritage assets and their setting, Key Statement EN5 with regard to heritage assets and policy DME4: Protecting Heritage Assets, Listed Buildings, Registered Historic Parks and Gardens and Scheduled Monuments and Other Archaeological Remains.
7. In general we are supportive of Key Statement EC1, which will help protect the countryside by focusing employment development in existing settlements, and the Enterprise Zone. However, parts of the A59 Corridor are visible from the surrounding countryside, such as from Pendle Hill which is protected by the Forest of Bowland Area of Outstanding Natural Beauty. Consequently, we recommend inclusion of a caveat in the policy to state development that would cause significant adverse landscape impacts would not be permitted. CPRE Lancashire wants to protect jobs in the visitor economy reliant on beautiful rural landscapes.
8. CPRE Lancashire is concerned at the inclusion of 'onshore wind' in the wording of Key Statement EN3 Part 1 'Proposals for the development of new renewable energy generation facilities, including onshore wind turbine technologies, will be considered'. We suggest this be omitted as the Government is clear on discouraging wind developments in upland areas. The landscape capacity and landscape sensitivity combine to making this topography unsuitable and therefore it should not be singled out or it may appear that policy encourages wind as a 'preferred renewable technology'.
9. Naturally, as an organisation that strives to protect the countryside, CPRE Lancashire is pleased to see the inclusion of 'Previously developed sites should always be used instead of greenfield sites where possible' in Policy DMG1. Ribble Valley's performance on housing development on brownfield land has decreased sharply since the NPPF was introduced, and the Local Plan should seek to improve this, see the table. *Table 1.0 Ribble Valley Completions on Brownfield since April 2008 (From Housing Land Availability Schedule, April 2014)*

Year	Brownfield	Greenfield	Total	% Brownfield
2008-2009	65	10	75	87
2009-2010	76	13	89	85
2010-2011	64	5	69	93
2011-2012	144	3	147	98
2012-2013	140	32	172	81
2013-2014	105	78	183	57

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**WOODLAND
TRUST**

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7th July 2014

Re: Consultation on the release of Ribble Valley publication of Main Modifications to Submitted Core Strategy.

Woodland Trust response

The Woodland Trust is the UK's leading woodland conservation charity, which aims to protect native woods, trees and their wildlife for the future. We do this by restoring and improving woodland biodiversity, and increasing people's understanding and enjoyment of woodland. We own over 1,000 sites across the UK, covering over 20,000 hectares (50,000 acres), and we have over 500,000 members and supporters.

Whilst Policy DME1 for protecting trees and woodlands does acknowledge ancient trees and ancient woodland and this is accepted, the Main Modification 55 on page 34 should also taken this into account. Only these are irreplaceable habitats which are not normally protected by any other designation.

Please do not hesitate to get in touch with me if you have any queries arising from this response.

Yours sincerely,

[Redacted signature]

[REDACTED]

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

[REDACTED]

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,


Chairman Clitheroe Residents
Action Group



Colin Hirst
Council Offices
Church Walk
Clitheroe BB7 2RA

1st June 2014

Core Strategy consultation

Dear Colin,

We note that the residual number of houses against the planned allocation for Whalley to 2028 is -68. This indicates that, even measured against the over-inflated housing targets imposed upon the council, Whalley will provide more than its share of housing in the borough over the next 15 years. We hope it will provide the means for RVBC to defend against continuing development pressure.

We are pleased to see that finally, if belatedly, the housing totals are no longer referred to as minimum targets. The notion that 520 houses for Whalley should somehow be viewed as a minimum appeared to us as both nonsensical and an open goal for developers.

Aside from this, we find nothing beneficial in the changes since the last consultation. Our previous objections as outlined most recently in our submission to the Examination in Public have not been addressed, and the increase to a total of 5600 houses has exacerbated matters. However as these objections are ignored we see no point in repeating them here.

More generally reading the revised Core Strategy it appears to give the Council's imprimatur on the recent development land-grab. No coherent or sustainable plan could decree 710 houses in Barrow and 588 in Whalley, whilst Langho gets 18 and Read & Simonstone gets 42. We worry that the reality of this distribution will undermine the objectives of the plan itself: in other words developers will argue that if 710 houses in Barrow is sustainable, then why not 500 in Langho, or 1000 in Whalley? We would like to see such a possibility forestalled by including some statement that the objectives of the plan have been partially compromised during its preparation by Inspectorate decisions, and that adherence to the plan from now on is required.

Best regards,

