

**Response to: Housing and Economic Development – Development Plan Document Consultation on Proposed Main Modifications – Additional Housing Allocations**

11/11/15

We do not think that the HED DPD is sound, positively prepared or justified and there are a number of issues that need addressing before the Council agree to increase the number of sites allocated for housing development in and around Clitheroe.

1. What evidence is there that there is sufficient demand for this new housing?  
The government has identified more evidence of the need to develop more housing in the south east of England rather than the North-West.
2. There is a desperate need for some social housing in Clitheroe and the Ribble Valley as there has been minimal built to date. Although there has been some affordable housing, even this is out of the price range of most first time buyers. Social housing for rent is required particularly for younger people (who cannot afford to buy in this area) & older people of whom there are many in the Ribble Valley, who no longer wish to inhabit & maintain larger family homes.
3. The Sustainability Appraisal in each of the recommended sites for further housing development mentions proximity to local infrastructure facilities such as health centres, schools etc. However, it makes no mention of any need to increase any of the main infrastructure facilities. So far there have already been considerable housing developments in Clitheroe such as at Henthorn Road, Littlemoor and Standen Estate. These are all still increasing the housing stock. There are also large developments which have been built in Whalley and Barrow, and new estates in the process of being developed such as Redrow in Barrow. So far there seems to have been little or no increase in essential infrastructure services in these areas. How much more housing stock can Clitheroe and the surrounding areas cope with without any corresponding investment in infrastructure?
4. It is noticeable that with the large increase in housing stock the number of cars in Clitheroe and the surrounding areas has markedly increased. The increase in private car use by commuters is contributing to the deterioration in air quality in the Ribble Valley & congestion on the roads at peak times. This has had a noticeable negative impact on air quality, especially from standing traffic at key junctions in Clitheroe and the junctions from Clitheroe to the A59. In relation to transport infrastructure, better rail links are urgently required from Clitheroe to Manchester & Leeds.
5. The rationale for housing development centring on Clitheroe, Whalley & Longridge as proposed in the Core Strategy, was their status as transport hubs & provision of social infrastructure. Since the strategy was approved inhabitants have seen the loss of infrastructure eg closure of some libraries & reduction of opening hours in others. Reductions in local public transport, making it difficult for people without private motor vehicles to get to work or access services. As in many others areas of the north of England there has been no enhancement of public transport.  
GP Practices are under too much pressure & those in outlying areas of the Ribble Valley such as in Slaidburn, may be forced to close. I have not seen any plan for the enhancement of local health facilities to serve the increased

population of Clitheroe. I have also not seen any plan to provide more school places in the Ribble Valley.

6. The Sustainability appraisal mentions the negative impact on increased commuter travel by private motor vehicles and specifically it makes mention of encouraging cycling. The Ribble Valley and especially Clitheroe is not cycle friendly. There is an increase in the amount of car and van traffic, there are minimal cycle lanes (which have a habit of suddenly disappearing), and there are numerous potholes in urban & rural roads. All these have a negative impact on the desire of adult residents to cycle or to encourage their children to cycle.
7. Updates to Sustainability Appraisal & Habitats Regulations Assessment (July 2018) refer to the need for significant amounts of green infrastructure in development design of greenfield sites to take account of landscape & climate change factors. It is evident from the "landscaping" at the entrance to the new Standen Development that the Developers are not being required to pay attention to the local ecology eg the inappropriate planting of box plants, which are subject to blight, when other more appropriate shrubs would be easier to maintain & provide better habitat.
8. As local residents of Gills Croft we are also aware (in Phase 1 of the Standen Development) of the felling of a mature healthy Ash Tree whilst a less healthy adjacent specimen was left standing. This implies that the Developer is using inefficient or unskilled contractors or not supervising their work adequately. Since the RVBC is proposing to give planning consent for the development of more greenfield sites it is necessary for them to specify more stringent requirements to safeguard & enhance the local landscape for present & future residents.
9. It is positive that recent flooding events in the Ribble Valley have led to developers being forced to take surface water drainage issues more seriously in proposed new developments. It would seem desirable that these large holding ponds be required to be designed to enhance the landscape & used to promote wildlife as well. The recent construction of the pond in Whalley (visible from the A59) appears ugly & with steep sides all round which would make it dangerous for some wildlife unable to get out if they entered it. There is also no sign of any attempt to make it an attractive feature, as well as a functional one.

We would both wish to participate at the Inspector's oral examination. It is vitally important to have representation from local residents at this examination. At the last examination of the Core Strategy by the Inspector we were usually part of a very small group of local residents. In contrast Landowners & Developers attended with large legal teams & a very short-term interest in the future of this area.

