

RIBBLE VALLEY BOROUGH COUNCIL REPORT TO PLANNING AND DEVELOPMENT COMMITTEE

Agenda Item No.

meeting date: THURSDAY, 16 AUGUST 2012
title: RIBBLE VALLEY CORE STRATEGY – SUBMISSION STAGE
SUMMARY OF ISSUES AND PROPOSED CHANGES
submitted by: CHIEF EXECUTIVE
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1 PURPOSE

1.1 To receive information on the issues arising from consultation on the draft Core Strategy, consider suggested changes in response and to agree the submission of the Core Strategy

1.2 Relevance to the Council's ambitions and priorities:

- Council Ambitions - the Core Strategy is the central strategy of the Local Development Framework (LDF). It will help in the delivery of housing, employment and the protection and enhancement of the environment, ultimately presenting the delivery strategy for implementing the vision for the Ribble Valley for the next 20 years.
- Community Objectives – as a tool for delivering spatial policy, the Core Strategy identifies how a range of issues relating to the objectives of a sustainable economy, thriving market towns and housing provision will be addressed through the planning system.
- Corporate Priorities – the Core Strategy is the central document of the LDF and sets the overall vision and approach to future planning policy which will aid performance and consistency.
- Other Considerations – the Council has a duty to prepare spatial policy under the LDF system.

2 BACKGROUND

2.1 The Council has recently completed the formal 'Regulation 19' consultation stage in preparing its Core Strategy for the borough. Members have recently considered a report on taking the Core Strategy forward and are now presented with information that summarises the issues raised in response to the consultation and where it is considered appropriate proposed changes to the Core Strategy in response.

2.2 Members should be aware that at this stage, the information is intended to help an Inspector understand the range of issues that has emerged. At this stage, the Council does not present a full or detailed response to the representations as this will emerge through the Examination process. Copies of the full submissions are available for reference at the Council offices. As part of the submission process, the Council will

need to produce a regulatory statement that provides a summary of issues for the Inspector.

- 2.3 Having identified issues at this stage, any amendments that the Council considers are required are highlighted. As previously reported, there are a number of amendments suggested either in response to issues and comments raised, as a reflection of NPPF or to improve the clarity or presentation of the Strategy.
- 2.4 As previously agreed it is proposed to submit the Core Strategy incorporating the changes for Examination. This approach brings with it a number of risks as the changes will not have been tested nor will all parties have had opportunity to confirm if the proposals address the concerns raised. Whilst it would be a more robust approach to build time into the process to undertake this work this will inevitably delay the programme to have an up to date plan in place.
- 2.5 The Council is moving towards the formal stage where the Core Strategy is submitted to the Secretary of State for Examination. An Independent Inspector will be appointed to hold the Examination with the purpose of confirming that the plan is sound. The Council will need to be able to satisfy the Inspector that the plan has been prepared in accord with the duty to co-operate, legal and procedural requirements and whether it is fundamentally sound. (Paragraph 182 of the National Planning Policy Framework NPPF, refers). The NPPF sets out what constitutes a sound plan and consequently to be found sound the Council will need to demonstrate how it has addressed the NPPF tests. These tests are summarised as follows:
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the framework.
- 2.6 A number of important considerations need to be recognised. Firstly the preparation and publication of the Core Strategy coincided with the publication of the Coalition Government's final version of the NPPF. Attention to which was drawn to Members at the meeting of Planning and Development Committee on 4 April 2012, where the Core Strategy was agreed for public consultation. The publication of the NPPF has raised issues in the consultation responses that the Council will need to address as we need to ensure the plan reflects new National Policy. In addition, the emphasis in NPPF on the duty to co-operate is also an important factor to have regard to in progressing the plan.

3 SUBMISSION STAGE

- 3.1 The Council is now moving towards submission stage in the plan-making process which triggers the start of the Examination stage. Under the provisions of NPPF, Local Planning Authorities are expected to submit a plan for examination that is sound. In terms of Ribble Valley position it has to be recognised that some changes to the published Core Strategy will be required primarily as a consequence of the final version of NPPF. Having identified and agreed those changes it would be preferable to republish the Core Strategy, undertake a further formal six week consultation stage as a re-run of the Regulation 19 publication prior to submitting the Core Strategy. In doing so it would of course be possible that further changes are required and of course the datedness of the supporting evidence base becomes further extended, which also has to be taken into account. Fundamentally however this will serve to delay the current programme that is seeking to have a Core Strategy/Local Plan in place as soon as possible.
- 3.2 As Members are all too aware, Ribble Valley is undergoing increasing pressure from development and there is a clear need to put in place an up to date plan. This is particularly so in light of the National Planning Policy Framework and national agenda which promotes and supports economic growth. This is also a reason why land interests will seek to robustly challenge the Council and its plan-making process as the longer the area is without an up to date plan the more readily the expectation is that National Planning Policy, namely the presumption in favour of sustainable development, will be applied. Bearing in mind the need to balance these considerations, advice has been sought from the Planning Inspectorate and Planning Advisory Service on options to maintain progress given Ribble Valley's circumstances.
- 3.3 Advice from PIN's supports the process of republishing before confirming a submission version as this clearly carries the lowest risk from a plan-making viewpoint yet it was acknowledged that there must be a consequent impact on delivery of an adopted plan. Planning applications will continue to be determined against National Planning Policy Framework considerations in that circumstance.
- 3.4 The suggested approach from a PIN's viewpoint is to submit the Core Strategy with the proposed changes but at the time of submission publish the changes for consultation. This would still be subject to an Inspector accepting the approach, but would reduce the amount of risk although could still be subject to challenge. This would enable the Inspector to use the outcome of the consultation to inform consideration of the Core Strategy. Again this would depend on giving consideration to the extent to which changes were required and whether the plan was fundamentally unsound. There are risks in progressing the plan in this manner. The Inspector may consider the changes to be too significant and that the whole strategy should be republished under Regulation 19 in any event, there is a risk of delaying the Examination if issues that are raised through the consultation need resolving or generate a need for further specific work and there is of course always a risk of challenge by third parties. However this approach would allow progress to continue and has been agreed by Members as the way forward in current circumstances.

3.5 On this basis the programme of key dates is as follows:

STAGE	TARGET DATE
<ul style="list-style-type: none"> • Consideration of representations, the Council's response and agree proposed amendments, including resolution to formally submit 	Planning and Development Committee 16 August
<ul style="list-style-type: none"> • Ratification of submission 	Full Council 28 August
<ul style="list-style-type: none"> • Commence formal consultation on proposed changes 	week commencing 10 September
<ul style="list-style-type: none"> • Formally submit to the Secretary of State 	week commencing 10 September
<ul style="list-style-type: none"> • Earliest likely hearing dates 	Late November

4 SUMMARY OF ISSUES

- 4.1 As indicated above, at this stage of the process the Council needs to identify, in general terms the range and extent of issues that have arisen from the publication of the Core Strategy. This is not intended as a full and detailed response by the Council rather it will help inform the Inspector's deliberations. The summary schedule is attached at Appendix 1 and leads with a summary of the public response by area and then representations by consultation bodies and interest groups as well as landowners and developer interests.
- 4.2 As can be seen from the summary, there are a wide range of issues raised covering concerns about the distribution of development, the scale and nature of development, technical considerations together with concerns about process and legality. As may be anticipated, many of the issues will remain to be developed and tested as appropriate through the examination.
- 4.3 The schedule at Appendix 2, identifies those changes that are suggested to be made to the publication version of the Core Strategy and which are deemed necessary to deliver a sound plan. These proposed changes have emerged either as a result of consultation responses or in response to the publication of NPPF. Members are invited to consider and agree the proposed changes against the draft Core Strategy, a copy of which is included with this agenda for Planning and Development Committee Members. As Members will see, many of the proposed changes serve to update and clarify the Core Strategy. Editorial and presentational changes are also suggested to assist the use of the document.
- 4.4 It is also suggested that in order to avoid any unnecessary delays in the submission process or indeed in responding to the Inspector during the Examination, that authority is delegated to make and agree changes and amendments where there is no fundamental change to the policy direction of the Core Strategy and where they are intended to improve, clarity, interpretation or meaning of the Core Strategy or where a concern raised by the Inspector can be resolved. It is suggested that authority be delegated to the Head of Regeneration and Housing, in consultation with an advisory panel comprising the Chief Executive, Chair and Vice Chair of Planning and Development together with the Leader and Deputy Leader of the Council.

- 4.5 It is proposed that the Core Strategy Regulation 19 draft as amended by the changes, is agreed to form the submission version of the Core Strategy, from which a composite document will be prepared for reference. Submission of the Core Strategy will also require the preparation of a number of supporting documents to meet the applicable regulations and these documents will be drawn up as part of the submission process.
- 4.6 Members' attention is drawn to the need to ensure that any amendments proposed in response to the Regulation 19 Consultation will need to be the subject of testing through the Sustainability Appraisal work. This will be undertaken by the Council's existing consultants, Hyder Consulting who have undertaken the appraisal work so far. This will be an additional cost to the core work already undertaken, the cost of which will be related of course to the extent of changes proposed. Members will recall that provision has been included in the Core Strategy budget to meet such potential, additional consultancy needs.

5 ADDRESSING SUSTAINABLE DEVELOPMENT – MODEL POLICY

- 5.1 Many of the changes identified comprise relatively minor adjustments and clarifications, it is important in proposing changes at this stage that changes are not so significant that the change fundamentally alters the plan. Whilst some of the changes go further than correction and refinements, they are considered to be focused in nature and consequently do not introduce significant major changes in that regard.
- 5.2 One issue that has emerged that the Council will need to take on board, is the recommendation by the Planning Inspectorate of a model policy that is suggested for inclusion in Core Strategies in order to reflect the requirements of national policy and the presumption in favour of sustainable development. The Policy highlights the significant change in stance that is expected of Local Planning Authorities as a result of the NPPF. The wording of the model policy that Inspectors are indicating they will expect to see in order to ensure that authorities are complying with the NPPF, is set out below.

“When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- *any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- *planning policies in that framework indicate that development should be restricted.*

- 5.3 This clearly emphasises the direction of travel in which Local Planning Authorities are expected to move in terms of dealing with development proposals in their area and this will have an impact upon the approach to making decisions on planning applications and particularly so in those circumstances where the Local Plan is not up to date. Once again, this highlights the importance of making progress through the plan making process to ensure an up to date Local Plan can be put in place. The nature of risks highlighted earlier in this report regarding the process suggested are important factors to take into account but these have to be balanced with the clear need to have in place as soon as possible an up to date Local Plan and particularly so ahead of the close of the transitional arrangements in March 2013 whereby all decisions would fall back on the national planning framework in the absence of an up to date Local Plan.
- 5.4 The NPPF confirms that as a rule, sustainable development should be approved. It also seeks to establish the basis for considering what is sustainable development, which in essence means bringing together the three respective roles that government has identified for the planning system, namely an economic role, a social role and an environmental role. The introduction of the policy into the Core Strategy is recommended as a mean of determining how the Council will address the sustainable development issues.

6 NEXT STEPS

- 6.1 Subject to the consideration of the proposed changes the intention would be, following notification of this Committee's decision at Full Council to prepare the necessary documentation to enable the Core Strategy to be formally submitted for Examination. In addition, in line with advice the changes would be published for consideration to enable the results to be available to the Inspector.
- 6.2 Upon submission the Council would be notified of the appointed Inspector and a date would be likely to be set for a pre-examination meeting, usually around 4 weeks after submission. That meeting would confirm the issues the Inspector considered pertinent to examine, raise any initial concerns identified by the Inspector and set the course for the hearing dates. The hearing dates would usually commence around 10 weeks from the pre-examination meeting depending on matters arising.

7 RISK ASSESSMENT

- 7.1 The approval of this report may have the following implications:
- Resources – Members have agreed a budget to progress the Core Strategy.
 - Technical, Environmental and Legal – The Council has to follow the statutory regulations in preparing the Core Strategy. The selected approach brings with it a series of risks that the Council may be challenged upon or that an Inspector may not be satisfied with which would have an impact on the process and costs incurred.
 - Political – There is significant public interest in the Core Strategy.

- Reputation – Decisions taken in connection with the Core Strategy will help demonstrate the Council’s obligations to fulfil its statutory duties and meet its objective of being a well run Council.
- Equality & Diversity – No implications identified.

8 RECOMMENDED THAT COMMITTEE

- 8.1 Agree the schedule of changes set out in Appendix 2 and agree that they are formally published for 6 weeks public consultation.
- 8.2 Agree that the submission Core Strategy be comprised of the published Regulation 19 document as amended by the agreed changes and that a composite document be prepared as the Submission Core Strategy as soon as practicable.
- 8.3 Agree to delegate authority to the Head of Regeneration and Housing, in consultation with a panel comprising the Chief Executive, Chair and Vice-Chair of the Planning and Development Committee together with the Leader and Deputy Leader of the Council to undertake such further revisions, technical corrections and editorial changes deemed necessary in preparing the Core Strategy for submission to the Secretary of State and to agree changes where appropriate during the Examination.
- 8.4 That subject to confirmation by Full Council and having prepared the necessary submission documents in accord with the relevant regulations, to submit the Core Strategy as amended to the Secretary of State for formal examination as soon as possible.

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HEAD OF REGENERATION AND HOUSING

MARSHAL SCOTT
CHIEF EXECUTIVE

BACKGROUND PAPERS

Core Strategy files – various.

For further information please ask for Colin Hirst, extension 4503.

REF:CH/EL/16081203/P&D

Response Summary

Summary of the public response by area and representations by consultation bodies, special interest groups, landowners and developers.

This report summarises the main issues raised by the wide variety of private individuals and organisations that responded to the Regulation 19 Core Strategy consultation. It is not intended as an exhaustive list of all the individual points made by each responder together with the Council's response to each point. This latter work is currently in progress and will be presented to the Planning Inspectorate as a part of the preparations for the Core Strategy's forthcoming Examination in Public later this year.

The actual responses were made in a variety of formats; many of those supplied by adjacent local authorities, government agencies and planning consultancies followed the formal structure of the response forms supplied by the Council through its feedback site, online or in hard copy form and specified in detail the individual parts of the document and the individual "soundness" tests prescribed in planning legislation that were felt to be relevant. Many, though by no means all, local private individuals tended to respond in more familiar formats, many through descriptive letters and notes. These different response formats are reflected in the table below. It should also be borne in mind that many responders made more than one point so the number of responses and the number of responders will not be the same.

Redacted copies of all responses made to the Council in the consultation are available on request at Planning Reception in the Council Offices.

Core Strategy Regulation 19 Consultation 2012: Summary of public response by area

The overwhelming number of private individuals who responded to the Core Strategy did not relate their comments to individual specific parts, paragraphs or policies of the plan but instead made descriptive statements of their feelings about a variety of issues. The remainder did relate their comments to specific parts of the document. Also in should be remembered that some respondents made more than one point. Both these sets of comments are summarised below by settlement.

CLITHEROE

Of the responses made by 144 private individuals relating to Clitheroe many revolved around similar general concerns about development in the town and especially the implications of the strategic housing site at Standen, rather than specific policies or statements within the Core Strategy document. In detail these points concerned the following:

1. Proportion of Total New Development for Clitheroe

Some thought that Clitheroe is being required to accept an inappropriately large amount of the new development in the Borough during the plan period. They felt that it should only accept new development in line with its proportion of the Borough's total population, which most respondents felt equated to 25% of total new development.

2. Infrastructure Issues

Many thought that the local infrastructure would not be able to accept the additional pressures that the new development would produce. Some felt that aspects of local infrastructure were already operating at or close to capacity and did not find that the Local Infrastructure Plan (LIP) that accompanied the Core Strategy gave them the assurances and guarantees they sought that infrastructure would be upgraded to the necessary standard to accommodate new development. There were several specific infrastructure issues regularly quoted:

2A. School Provision

Concern was expressed that local primary and secondary schools would not be able to cope with the new pupils generated by new development. Some went on to express a view that, should a school site be provided at the strategic housing site at Standen, no school would actually be built, and that or others would not be upgraded due to lack of funding at either a local or national level. In addition some felt that the Local Infrastructure Plan (LIP) implied that there would be provision made for new pupils by bussing them out of the Borough to schools elsewhere.

2B. Roads and Traffic

Many also expressed concerns that the local road network would be unable to cope with the additional traffic and that this had congestion and safety implications. Some went on to say that those living in the new strategic site would not walk or cycle into town but continue to use their car adding to town centre congestion, while others felt that the Standen development would lead to more commuting for jobs outside the town and also extra car use would also be made to shop elsewhere rather than in Clitheroe. Some connected this latter point to a perceived lack of forward public car park provision in Clitheroe. Some went on to detail concerns over traffic and congestion in relation to specific roads that could serve the strategic housing site at Standen, such as Pendle and Whalley Roads. Some added that this would add to local pollution. Again some noted from the Local Infrastructure Plan (LIP) that the Local Transport Plan does not indicate any significant upgrading of local roads.

2C. Health Services

There was also concern that local health facilities would not be able to accommodate the additional need from new development. Many felt that the local facilities were at or near capacity and that there was no physical room to expand the local Health Centre. Other mentioned the recent withdrawal of plans to develop a new hospital in the town as further evidence of the unlikelihood of new health investment. Some stated that there was no confirmed national health investment funding beyond 2014, and that therefore new facilities would not be put in place and that this would lead to longer waiting lists and other problems.

2D. Utilities (including water and waste water and sewerage)

Some felt that there were already problems with water supply and drainage in the area and that the Standen strategic site, by virtue of its size, would create more problems. Again there was a perception that local facilities are at or close to capacity and that the LIP did not contain guarantees that this would be addressed.

2E. Car Parking

Some noted that the LIP did not contain a commitment to increase public car parking to deal with the extra traffic that the town and its centre would experience and were concerned about this.

2F. Leisure and Recreation Provision

Some felt that new development should require an increased provision of leisure facilities and noted that the LIP did not indicate this.

2G. Refuse Collection

Some felt that the new development would cause problems with the provision of this service

In addition to the above the following none infrastructure related points were raised:

3. Effect on local environment and wildlife and recreational opportunities

Some objected to the loss of countryside and associated biodiversity and wildlife should the strategic site be developed. Also some objected to the perceived loss of footpaths and informal recreation development of the site would entail.

4. Loss of Farmland and Greenfield Land

Allied to the loss of countryside and wild life was the concern that the strategic site would use up valuable farmland and a Greenfield site when planning should be concentrating on developing on brownfield sites in smaller locations in the area. No such individual brownfield alternative sites were quoted.

5. Loss of Local Character of Clitheroe and Locality

Also many felt that the new development would change the character of the town for the worse. Some added to this that the strategic site would be of such a scale as to produce this effect and make the area more urban in character.

6. Lack of Associated Employment

Some were concerned that in the current economic climate there would not be the local jobs for the residents of future new development, some adding that therefore this would only add to current perceived high levels of commuting.

7. Overall Housing Figure and Current Dwellings For Sale

Some felt that the overall housing requirement for the Borough was too high and added that the many house for sale in the area and in Clitheroe proved that there was not the need for so many new houses.

8. Build More New Development in Other Parts of the Borough or in Adjacent Boroughs

Some felt that it would be better to place more new development either elsewhere in the Borough, such as in local villages or in adjoining towns such as Accrington where they felt development would help support struggling communities and services such as shops and schools.

9. Effect on Tourism

Some felt that the level of new development proposed for Clitheroe would affect the local tourist trade, such as through appearance of increased urbanisation and increased traffic.

BARROW and WISWELL

50 individual residents, 48 from Barrow, (including 36 residents responding in identical format) stated their concerns regarding the traffic and noise implications of development at Barrow Enterprise Zone for both Barrow and Wiswell.

In addition they expressed concerns over the lack of infrastructure in relation to traffic, waste water, excessive school class sizes and some felt that this meant that the settlement should not receive any further development. Several also stated that they wished to see development permitted within the area since 2008 taken into account in any further apportionments.

LONGRIDGE

In Longridge there were 29 responses in total. They fell into two main categories.

The first related to the general feeling that the proposed levels of development were excessive and that account should be taken of developments proposed nearby within the Preston City Council area. The need for greater liaison with Preston Council was also mentioned. In addition some mentioned that they were concerned that elements of local infrastructure would not be able to cope.

The second issue related to the issue of Open Space as defined in Core Strategy policy DMB4 "Open Space Provision" (P97 para 10.26). 21 of the Longridge responses related to this matter with 9 supporting the Core Strategy text and 12 feeling that the policy undermined the protection given to some local sites under the current Local Plan policy G6. These latter respondents cited a recent local planning appeal decision on a G6 local site in support of their position and suggested an alternative wording to the DMB4 policy that sought to include reference to "private open space" within the policy.

WHALLEY

There were 9 responses from private individuals from Whalley. In general they questioned whether the local infrastructure could sustain the levels of proposed development, which was felt to be excessive given Whalley's size and infrastructure and cited traffic congestion,

drainage, water supply and inadequate school places as examples of this problem. Some felt that Whalley should not be classed as a key service centre.

OTHER SETTLEMENTS

There were 10 responses from 10 individuals who did not live in the above places. These came from Sabden, West Bradford, Hurst Green, Downham, Chatburn, Langho and Mellor. While some deal with issues particular to a place a general view was that no more development was required in these settlements and that also, for some, infrastructure was a limiting factor.

OTHER COMMENTS

In addition to the comments above 15 responses mentioned concerns over a variety of issues relating to the process of the consultation. Some felt that various consultation documents were not written in an accessible way; others that they had insufficient knowledge to make a judgement on some technical points; others felt that their comments would be ignored and that the results of the process were pre-determined by government policy.

Core Strategy Regulation 19 Consultation 2012: Representations by consultation bodies, special interest groups, landowners and developers

NAME	ISSUES RAISED
Wyre BC	Cumulative impacts of development in Ribble Valley, Wyre and Preston on highway infrastructure, especially M6, M55 and A6 at Broughton
	Matters related to Gypsy and traveller policies
Pendle BC	Matters related to Gypsy and traveller policies
CPRE	Matters related to landscape character and protection
	Protection of farmland
	Housing numbers
	Need for policy to reflect presumption in favour of sustainable development
Network Rail	Rail infrastructure and level crossings
English Heritage	Adequacy of policies in relation to heritage assets (generically and in relation to Standen)
	Clarity of the plan (distinction between policy and reasoned justifications)
Simonstone PC	Need to protect potential cycle route for completion of NCN6
Longridge TC	Need to undertake strategic review of plan in view of economic situation
	Housing matters: Annual housing provision too high; provision for Longridge too high; housing mix
	Unique situation of Longridge not recognised
	Need or cross boundary working
	Matters related to former policy G6
	policy for listed buildings should be strengthened
	Possibility of Neighbourhood Plan
Environment Agency	Recognise need for SFRA level 2 (generically and possibly in relation to Strategic Site at Standen)
	Need for strategic objectives to include reference to climate change
	Matters relating to Water Framework Directive
Theatres Trust	Plan does not adequately assess social and cultural wellbeing; social role of planning
	Plan not clear on how area will change
	Plan not robust in respect of protecting and enhancing social, community and cultural facilities
	Lack of policies to guide leisure infrastructure
	Lack of guidance for range of town centre uses
Save Whalley Village	Inappropriate designation of Whalley as Key Service centre
	Level of housing requirement for Whalley
	Traffic and congestion issues in Whalley (including provision of commissioned report)
	Consideration of community views
	Challenge education forecasts/education infrastructure
	Impact on sustainability matters (housing need, transport, public transport, land use, economic growth)
	Impact conservation area and tourism
	Views of community gathered in a survey

NAME	ISSUES RAISED
Blackburn with Darwen BC	Support for housing matters
Natural England	Matters relating to compliance with final version of NPPF in relation to Environment Chapter.
	Incorrect conservation objectives used for SPA and SAC in relation to the HRA
	Infrastructure Plan comment in relation to natural environment sections compliance with NPPF.
Lancashire County Council (Environment Directive)	Supports the Core strategy in principle and welcomes the plan.
	Matters relating to compliance with final version of NPPF in relation to Environment Chapter
	States commitment to work with District on Infrastructure/CIL
	Stress importance of phasing the strategic site.
	Request for updates regarding Enterprise zone to be included.
	Delete DM policy reference to Minerals and Waste Developments (not a s106 issue).
	Clarify Key Statement EC2 relating to public sector property.
	Include reference to travel plans and sustainable provision.
	Implications of development on both designated and undesignated heritage assets and amend DME4 to reflect final NPPF.
	Include reference to upland landscapes and associated habitats
	Include reference to BHSs
	Clarify open space contributions on smaller sites
	Amend source for monitoring indicator
	Reference Forest of Bowland AONB renewable Energy Position Statement
	Amend SSSI, BHS and priority habitats and species figures.
Forest of Bowland AONB	Welcomes the Core Strategy
	Provide sufficient reference to wider landscape and visual impact of development on landscape character of AONB.
	Reference botanically-rich roadside verges
	Reference AONB Landscape Character Assessment 2010
	Highlight ecosystem services offered by blanket bog habitat
	Reference Forest of Bowland AONB renewable Energy Position Statement
Clitheroe Residents Action Group	Matters relating to infrastructure, leisure provision
	Considers Infrastructure Plan does not meet DMG1 points.
	Matters relating to housing distribution calculations
Hyndburn BC	Requests further detail of DM policies
The Woodland Trust	Matters relating to compliance with final version of NPPF in relation to Environment Chapter (specifically ancient woodland other irreplaceable semi natural habitats)

NAME	ISSUES RAISED
Lancashire Fire and Rescue	Core Strategy does not have the potential to increase the risk profile of the area from a fire and rescue perspective.
Clitheroe Civic Society	Matters relating to housing distribution calculations
	Matters relating to infrastructure
	Matters relating to affordable housing provision- request for clarification
Read PC	Matters relating to housing distribution calculations
Whalley PC	Matters relating to housing distribution calculations
	Matters relating to infrastructure
Whittingham PC	Matters relating to housing distribution calculations- considers it not clear why development is needed in the area.
	Development on boundary not acceptable
	Request for option D- consider that this would make plan sound.
	Matters relating to infrastructure
Preston City Council	Notes the identification of Longridge as a KSC
	Considers the focus on Longridge contributes to a sustainable pattern of development
	Acknowledges meetings proceeding the duty to cooperate have taken place at officer and Member level to discuss impact on the highway network towards Broughton and Grimsargh
	Notes protection of AONB and is consistent with Central Lancs. Core Strategy and Preston Site Allocations DPD
	Affordable housing percentages consistent with requirements in Central Lancs.
Grimsargh PC	Matters relating to infrastructure
Lancashire County Council (Adult and Community Services)	Welcomes changes/additional inclusions that have been made to the Core Strategy at DMG2.
	Welcomes changes/additional inclusions that have been made to the Core Strategy at DMH1: Affordable Housing:
	Welcomes changes/additional inclusions that have been made to the Core Strategy at DMG3: Transport and Mobility:
The Coal Authority	Welcomes the inclusion of the supporting text associated with Key Statement EN3 drawing attention to the fact that reference should also be made to relevant policies within the Lancashire Minerals and Waste development Framework.
	Matters relating to compliance with final version of NPPF in relation to Environment Chapter.
The Wildlife Trust	Matters relating to compliance with final version of NPPF.
	Amend SSSI, BHS and priority habitats and species figures.
	Consider ANGSt
	Suggest RVBC should have an Environmental Strategy
	Define wider local environment
	Further reference SUDSs
	Clarify text relating to 'local sites'

NAME	ISSUES RAISED
	Request clarification in relation to monitoring
	Update Phase 1 habitat survey
	Sustainability appraisal to any potential ecological impact of EN4.
	Matters relating to planning obligations
	Request for statement regarding the need to protect any retained trees / adjoining habitats during the construction process.
	Reference to a presumption against development, which has an adverse effect on protected areas etc
	Supports DME1, DME2, DME6 and DMH2
	Further reference to bats
	Reference potential impact on biodiversity
	Include reference to any existing nature conservation aspects of the existing structure being properly surveyed, then any loss adequately mitigated.
	Highlights significant potential for open spaces to contribute towards the enhancement of biodiversity.
	Include additional monitoring indicator
	Amend BHS definition in glossary
	Amend evidence base author of an evidence base document
	Request further detail of having worked with neighbouring authorities to develop the policies
Clitheroe Town Council	Housing distribution comments/requests
	Requests Infrastructure clarifications and environmental policy detail
	Request involvement in future Clitheroe development (as a technology hub and in Town Centre Masterplan work)
Sport England	Compliance of evidence base in relation to NPPF in terms of an open space assessment.
Stonyhurst Carter Jonas	Acknowledges that the Core strategy has been positively prepared. Principle concern relates to the soundness of the Strategy and subsequent legal compliance of the approach as a result of publication of NPPF. In order to address deficiencies the strategy needs to be extensively reviewed together with the SA/HRA and the evidence base to ensure consistency with NPPF. Promotes the inclusion of the “model policy to reflect the Presumption in favour of sustainable development.
	Concern that text does not reflect NPPF and that the approach in the document to include detailed policies may not be appropriate and would be best delivered through an allocations DPD
	Suggests as appropriate a reference to Stonyhurst college be included as a significant employer and unique collection of heritage assets in the borough. The section would benefit from some clarification of definitions and meanings and to a more consistent approach to the referencing of the evidence base with relevance to the Core Strategy explained and findings summarised.
	Concern that the objectives are not consistent with NPPF and some clarification is needed. Absence of NPPF core principles relating to High quality design and health and well being should be addressed.
	Concern that the derivation of the spatial principles is not referenced
	The general approach of policies that seek to protect the high quality

NAME	ISSUES RAISED
	environment is viewed as unsound as it policy should also reflect the need to both conserve and enhance in line with NPPF
	Does not think that green Belt policy is a relevant environment policy but would be better located within the spatial/strategic element of the Core Strategy.
	A reference to the AONB management plan would assist with clarity
	Considers that the policy would be better re titled Sustainable Construction Standards but that a balance is maintained between standards and viability
	Broadly support the policy however suggest reference should be made to linkage and the creation of a network of sites
	Broadly support the policy however consider it could be more positively phrased by replacing preservation with conserve and enhance
	Support for an uplift of housing requirements above RSS provision.
	For consistency suggest that wording is amended to refer to “at least 4000” dwellings The policy wording needs to reflect viability and economic return in order to comply with NPPF. Concern is expressed about the focus upon SHMA which may not reflect prevailing market conditions
	Broadly supported but need to take account of market conditions and the constraints of SHMA assumptions
	Reference is sought to importance of Stonyhurst to the local economy
	Policies in the Core Strategy should support housing growth in rural settlements where it will underpin community facilities and services.
	Core Strategy should give regard to viability and costs.
	Core Strategy should give regard to the need to recognise competitive economic returns.
	No need seen for the policy nor should it refer to retention of specific sites rather it should be done by way of site allocations DPD
	Not clear what the purpose of the policy is and therefore should be deleted
	General question around the need for many of the policies, concern regarding repetition and the impact the inclusion of the suggested model policy would have by removing need for duplication
	Does not consider the provisions of the policy to add significantly to national policy and that the drafting could be clarified
	General concern re iterated about the format and clarity of the policies and unnecessary duplication
	Policy needs to be updated to reflect NPPF
	Concern that the policy contradicts itself in terms of application of the policy and there is a need to recognise viability
	Seeks amended policy wording to enable consideration to be given to there being “no greater impact upon the landscape” rather than no adverse impact. The restriction on change of use for holiday accommodation is viewed as contrary to policy.
	Considers the policy to be contrary to national policy provisions consequently the 1 st bullet should be deleted. The requirement for genuine history is meaningless and unnecessary.

NAME	ISSUES RAISED
	Provision 2 of the policy is meaningless and should be deleted
	The narrative to the first part of the policy is unclear and provides no guidance or certainty
Mike Gee	Supports the housing distribution set out in Development Strategy. Concerned about deliverability and certainty for developers.
	Object to proposed review of housing requirements identified in the policy.
	Does not support provision for elderly in all housing developments
	Does not support provision for elderly in all housing developments
	Concerned that the DM policies do not provide adequate clarity guidance and certainty. The policies need to be fully justified and written in a more positive manner. The intention to refuse the removal of holiday let conditions is seen as inappropriately negative and a criteria based approach setting out when applications would be approved is suggested.
	Objects to the presumption against the conversion of isolated buildings to residential use.
	Concerned that the Core Strategy should be accompanied with a comprehensive proposals map and that the intentions are not clear.
Trustees of Huntroyd Estate and Clitheroe Auction Mart Dickman Associates	Objects to references to NLP report as being out of date and does not reflect NPPF.
	Paragraph needs to be updated to reflect NPPF
	The vision is not achievable as highways and background documents do not categorise the accessibility of different locations and weigh them to provide a comparison.
	Allocation of a Strategic site will not address housing requirements. Other sites should be identified. Standen will create an isolated development that will not relate to Clitheroe. The need for Infrastructure will not enable the site to be sustainable or contribute to supply in the first 5 years. The distribution of development in the strategy to smaller settlements is not justified.
	This policy is supported. Clients site is highlighted as the most sustainable site in Clitheroe
	Concerned that paragraph makes a confusing reference to RSS and does not reflect the proposed housing requirement or the NPPF consideration for supply buffering
	The policy does not address the need for a mix of housing by type and tenure across all sectors of society and overemphasises elderly needs. Any elderly provision needs to be reflected in education requirements
	Comment expressing the suitability of Standen as an employment site
	Object to continued recognition of long standing employment site contrary to NPPF
	Considers the wording needs revising to say "others should be involved in the implementation"
	Objects to the extent of list of potential contributions and considers the

NAME	ISSUES RAISED
	wording should reflect economic circumstances and not be optimistic
	Considers the requirements too onerous and reference should not be made to CIL
	Concerned that the policy implies a priority for rail and should be worded so that no grading or priority to transport modes is given
	Concerned that the options have not been adequately tested. The strategic site will fail to achieve the objectives of NPPF or address housing requirements in RVBC. Other sites should be identified. Standen will create an isolated development that will not relate to Clitheroe. The need for Infrastructure will not enable the site to be sustainable or contribute to supply in the first 5 years. The council will be unable to meet its 5 year requirement. The strategic site may be better suited to employment use. The reality of the connectivity the site is questioned.
	Support the wording of the paragraph. Identifies a lack of physical features at Standen and highlights the view that the clients site is better defined, closer to town centre and the transport interchange.
	The considerations listed need to be prioritised and weighted to help interpretation
	The policy is too restrictive
	Glossary needs to reflect relevant strategic housing requirement
	The appendix needs to be updated to show current housing land supply figures and should not be based on RSS
Trustees of Standen Estate Steven Abbott Associates	The representation highlights a range of factors in relation to the Strategic site that demonstrate the proposals consistency with NPPF. These are set out in an associated supporting statement and overview to which reference should be made.
	Supports the Key diagram and the identification of the Standen Strategic Site. Suggests as good practice the inclusion of a separate OS based plan.
	Identifies the need to show the boundary of the Strategic Site on an OS base and highlights that the boundary is in fact shown in the document. The paragraph therefore needs to be updated.
	Want to see the word “necessitate” replaced with “secure”
	The policy is supported with the proviso that reference to the strategic allocation is incorporated. Concerns are raised regarding some of the supporting text and views expressed in paragraphs 4.3 – 4.5 Clarification is sought on paragraph 4.11, namely to ensure the context of the site is not misunderstood.
	Want to see the word “necessitate” replaced with “secure”.
	Support for the policy expressed. DS1
	Support for the policy expressed. EN2
	Support for the policy expressed. EN3
	Support for the policy expressed. EN5
	Support for the policy expressed. H1
	Support for the policy expressed. H2
	Support for the policy expressed. Concern raised about need to clarify when viability assessments are required and a need to define elderly provision
	Support for the policy expressed. EC1

NAME	ISSUES RAISED
	Support for the policy expressed. DM2
	Support expressed for the policy. DMG1
	Support expressed for the policy. DMG2
	The policy needs to be clarified to avoid ambiguity.
	Concerned about the implementation of the policy, particularly if applicants are required to undertake Need surveys
	Support expressed for the policy DME1
	Consider the policy exceeds what is necessary given other controls and that the policy should be written in the positive.
	Supports the policy although considers that there are no such features on the strategic site
	Supports the policy. DME6
	Supports the policy. DMB5
The Co-operative	Considers the Strategy is unsound as the distribution of housing development is not justified and that more development should be directed towards the main settlements.
	Supports the proposed housing provision but promotes the inclusion of the NPPF based supply buffer
Tom Croft Janet Dixon Town Planners	Supports the housing distribution set out in Development Strategy. Concerned about deliverability and certainty.
	Object to proposed review of housing requirements identified in the policy.
	Does not support provision for elderly in all housing developments
	Concerned that the DM policies do not provide adequate clarity guidance and certainty. The policies need to be fully justified and written in a more positive manner.
	The intention to refuse the removal of holiday let conditions is seen as inappropriately negative and a criteria based approach setting out when applications would be approved is suggested.
	Objects to the presumption against the conversion of isolated buildings to residential use.
	Concerned that the Core Strategy should be accompanied with a comprehensive proposals map and that the intentions are not clear.
SAINSBURY's Supermarkets Turley Associates	Vision and supporting text should be expanded to acknowledge the importance of retail for local employment opportunities.
	Objectives and supportive text should be expanded to acknowledge the importance of retail for local employment opportunities.
	Objective should be expanded to make provision for future expansion of existing large scale retailers.
	Policy should acknowledge non B class uses as important employment generators and act as buffers between employment uses and residential
	Seeks the expansion of the policy to recognise that additional convenience retail floorspace may be allowed to serve community needs in sustainable locations. In addition that non B class uses can promote sustainable development in Greenfield locations
	The policy is not consistent with NPPF in ensuring the vitality of retail centres by supporting sustainable economic growth.

NAME	ISSUES RAISED
Mr and Mrs Hartley De Pol Associates	The policy should be more explicit regarding the role of the existing Barrow Enterprise Park to remove uncertainty and clarify if its expansion would be acceptable. Clarification is sought with regard to the role of Samlesbury Enterprise Zone in contributing towards the identified employment land requirements.
Duchy of Lancaster Smith Gore	Objects to the use of a strategic site at Clitheroe. A broader distribution is promoted to support smaller settlements. The ability for Dunsop Bridge to accommodate additional sustainable development is identified.
	Considers that the opportunity should be taken to review Green Belt boundaries
	Supports the protection of the AONB and the principles of policy EN2
	Considers that the housing numbers proposed should be uplifted to circa 220 – 260, although notes that some flexibility is included in the policy
	Supports the approach in policy H2 however promotes the importance of recognising the viability of schemes
	Supports the approach in policy H3 with regard to affordable housing thresholds but highlights the need to recognise viability
	Supports the proposals in policy EC1 however would prefer to see the importance of Greenfield sites recognised
	Need to consider residential conversions as alternatives to tourism or economic use in the context of the presumption in favour of sustainable development
	Supports the approach to planning obligations and the recognition of viability
	Policies do not adequately reflect NPPF with regard to re use of rural buildings for residential use and needs to be amended
Adlington	Promotes the need to include a specific policy in the Core Strategy for Specialist older persons accommodation
Trustees of the Standen Estate Steven Abbott Associates	Supports the approach in the Development Strategy and highlights a clients site in Sabden that would help address issues relating to car parking community infrastructure and affordable housing
Barratt Homes and David Wilson Homes Turley Associates	Policy H2 is not positively worded and needs to recognise flexibility in determining housing mix. There is duplication with other policies and it should be part of the DM policy section
	Definition of affordable housing in policy H3 does not match that of annex 2 of NPPF
	Clarification is needed in DS1 to explain how development will be accommodated. Concerns about the approach to establishing the distribution. Deliverability and over-reliance upon a single strategic site, need to demonstrate why Whalley should not accommodate larger share of development
	Does not accept the proposed housing requirement as it has not been fully justified why it was selected in preference to other scenarios and that it fails to address the requirements of NPPF to boost significantly the supply of housing.
	Needs to be made clear that settlement boundaries will need to be reviewed and clarification given on how the new development will be

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	accommodated.
	Strategic site is not justified, is too inflexible to rely on a single site and there is a need to evidence the deliverability of the site. There is a risk of the site preventing other sustainable development coming forward.
Hawthorne Farm Ltd ARUP	Suggests additional housing land will need to be identified. Account needs to be taken of NPPF supply buffering. Clarification on delivery of the Strategic site proposal needs to be given and phasing in relation to other sites. Limited information is available on-line regarding the Standen Proposal.
Vernon & Co.	The responder states that the Core Strategy needs to be updated to take into account the new requirements of the NPPF, particularly with regards to housing numbers and the need for supply buffering as per paragraph 47 of NPPF
Gladman Developments	The Core Strategy provides for insufficient Housing development and is not adequately evidenced. This will have an impact upon affordable housing delivery and deprives the community of an adequate supply of market housing and housing opportunity to live and work in Ribble Valley. Need will be displaced outside the borough. There is no evidence under the duty to co-operate that any co-operation agreement is in place with neighbouring authorities to support displacement. The CS vision will not be achieved. The Cs needs to provide for a total of around 330 to 350 dwellings per year.
	The Development Strategy fails to recognise the scale of population growth and the need for additional development that is much higher than the proposed 200 dwellings per annum. The use of a Strategic Site is not supported, as it will not provide sufficient housing within the plan period.
BAE SYSTEMS BNP PARIBAS	Supports the approach to the recognition of Bae Samlesbury as a key strategic employment location.
	Supports the recognition of Bae Samlesbury in policy EC1, however considers that the policy should more closely reflect South Ribble Borough Council's strategy as this would demonstrate collaborative working and would support the duty to co-operate. It would also wish to see wider operations and opportunities at the site supported directly in the policy.
	Supports the recognition of the Enterprise Zone in policy DMG2 .
	Policy DMB 1 is not consistent with NPPF as it will not accommodate development expected at the EZ and could restrict future expansion of activities at Bae Samlesbury. Similarly it could restrict expansion of other firms that would contribute to the local economy.
W MONKS JWPC	Concerned that the approach within the document is unclear with inconsistencies to the presentation of policies and questions whether sufficient justification is set out.
	Seeks clarification on the justification of Housing requirement and that the requirement should be increased and more aspirational given likely opportunities for growth in Ribble Valley. The policy needs to set out a strategic approach to guide subsequent allocations..
	The policy should recognise that some of the 4000 units proposed are already committed the Core Strategy will not influence these and this should be recognised.

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	Considers that the scale of development proposed is too great for a single site within Clitheroe. In addition the ability to deliver the site within the plan period is questioned and in any event would have a significant impact on the housing market. The allocation of the site needs to be clarified and a contingency recognised if delivery is delayed.
	Concerned about impact of the strategic site on the opportunities to provide growth at Clitheroe with a range of sites and its impact therefore upon the settlement strategy. The policy should promote greater growth at Longridge than proposed and that the CS fails to justify why less development is proposed. Concerns that the distribution to other settlements is not appropriate and should provide more detail on the amount of development each settlement would accommodate.
	Clarification on the reliance on SHMA information to determine planning applications
	The thresholds established in the policy are not sufficiently evidenced and may prevent a site coming forward.
	Concerned that there will be no flexibility for minor changes to the Green Belt and this should be referenced as an exception.
The Clitheroe RGS Foundation JWPC	Concerned that the approach within the document is unclear with inconsistencies to the presentation of policies and questions whether sufficient justification is set out.
	Seeks clarification on the justification of Housing requirement and that the requirement should be increased and more aspirational given likely opportunities for growth in Ribble Valley. The policy needs to set out a strategic approach to guide subsequent allocations..
	The policy should recognise that some of the 4000 units proposed are already committed the Core Strategy will not influence these and this should be recognised.
	Considers that the scale of development proposed is too great for a single site within Clitheroe. In addition the ability to deliver the site within the plan period is questioned and in any event would have a significant impact on the housing market. The allocation of the site needs to be clarified and a contingency recognised if delivery is delayed.
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	Clarification on the reliance on SHMA information to determine planning applications
	The thresholds established in the policy are not sufficiently evidenced and may prevent a site coming forward.
	Concerned that there will be no flexibility for minor changes to the Green Belt and this should be referenced as an exception
Beck Developments	Concerned that the approach within the document is unclear with inconsistencies to the presentation of policies and questions whether

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JWPC	sufficient justification is set out.
	Seeks clarification on the justification of Housing requirement and that the requirement should be increased and more aspirational given likely opportunities for growth in Ribble Valley. The policy needs to set out a strategic approach to guide subsequent allocations..
	The policy should recognise that some of the 4000 units proposed are already committed the Core Strategy will not influence these and this should be recognised.
	Considers that the scale of development proposed is too great for a single site within Clitheroe. In addition the ability to deliver the site within the plan period is questioned and in any event would have a significant impact on the housing market. The allocation of the site needs to be clarified and a contingency recognised if delivery is delayed.
	Concerned about impact of the strategic site on the opportunities to provide growth at Clitheroe with a range of sites and its impact therefore upon the settlement strategy. The policy should promote greater growth at Longridge than proposed and that the CS fails to justify why less development is proposed. Concerns that the distribution to other settlements is not appropriate and should provide more detail on the amount of development each settlement would accommodate.
	Clarification on the reliance on SHMA information to determine planning applications
	The thresholds established in the policy are not sufficiently evidenced and may prevent a site coming forward.
	Concerned that there will be no flexibility for minor changes to the Green Belt and this should be referenced as an exception
Clitheroe Royal Grammar School JWPC	Concerned that the approach within the document is unclear with inconsistencies to the presentation of policies and questions whether sufficient justification is set out.
	Seeks clarification on the justification of Housing requirement and that the requirement should be increased and more aspirational given likely opportunities for growth in Ribble Valley. The policy needs to set out a strategic approach to guide subsequent allocations..
	The policy should recognise that some of the 4000 units proposed are already committed the Core Strategy will not influence these and this should be recognised.
	Considers that the scale of development proposed is too great for a single site within Clitheroe. In addition the ability to deliver the site within the plan period is questioned and in any event would have a significant impact on the housing market. The allocation of the site needs to be clarified and a contingency recognised if delivery is delayed.
	Concerned about impact of the strategic site on the opportunities to provide growth at Clitheroe with a range of sites and its impact therefore upon the settlement strategy. The policy should promote greater growth at Longridge than proposed and that the CS fails to justify why less development is proposed. Concerns that the distribution to other settlements is not appropriate and should provide more detail on the

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	amount of development each settlement would accommodate.
	Clarification on the reliance on SHMA information to determine planning applications
	The thresholds established in the policy are not sufficiently evidenced and may prevent a site coming forward.
	Concerned that there will be no flexibility for minor changes to the Green Belt and this should be referenced as an exception
Fort Vale Engineering	Concerned that the approach within the document is unclear with inconsistencies to the presentation of policies and questions whether sufficient justification is set out.
JWPC	
	Seeks clarification on the justification of Housing requirement and that the requirement should be increased and more aspirational given likely opportunities for growth in Ribble Valley. The policy needs to set out a strategic approach to guide subsequent allocations..
	The policy should recognise that some of the 4000 units proposed are already committed the Core Strategy will not influence these and this should be recognised.
	Considers that the scale of development proposed is too great for a single site within Clitheroe. In addition the ability to deliver the site within the plan period is questioned and in any event would have a significant impact on the housing market. The allocation of the site needs to be clarified and a contingency recognised if delivery is delayed.
	Concerned about impact of the strategic site on the opportunities to provide growth at Clitheroe with a range of sites and its impact therefore upon the settlement strategy. The policy should promote greater growth at Longridge than proposed and that the CS fails to justify why less development is proposed. Concerns that the distribution to other settlements is not appropriate and should provide more detail on the amount of development each settlement would accommodate.
	Clarification on the reliance on SHMA information to determine planning applications
	The thresholds established in the policy are not sufficiently evidenced and may prevent a site coming forward.
	Concerned that there will be no flexibility for minor changes to the Green Belt and this should be referenced as an exception
Leehand Properties	Concerned that the approach within the document is unclear with inconsistencies to the presentation of policies and questions whether sufficient justification is set out.
JWPC	
	Seeks clarification on the justification of Housing requirement and that the requirement should be increased and more aspirational given likely opportunities for growth in Ribble Valley. The policy needs to set out a strategic approach to guide subsequent allocations..
	The policy should recognise that some of the 4000 units proposed are already committed the Core Strategy will not influence these and this should be recognised.
	Considers that the scale of development proposed is too great for a single site within Clitheroe. In addition the ability to deliver the site within the plan period is questioned and in any event would have a significant

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	impact on the housing market. The allocation of the site needs to be clarified and a contingency recognised if delivery is delayed.
	Concerned about impact of the strategic site on the opportunities to provide growth at Clitheroe with a range of sites and its impact therefore upon the settlement strategy. The policy should promote greater growth at Longridge than proposed and that the CS fails to justify why less development is proposed. Concerns that the distribution to other settlements is not appropriate and should provide more detail on the amount of development each settlement would accommodate.
	Clarification on the reliance on SHMA information to determine planning applications
	The thresholds established in the policy are not sufficiently evidenced and may prevent a site coming forward.
	Concerned that there will be no flexibility for minor changes to the Green Belt and this should be referenced as an exception
Commercial Estates Group INDIGO Planning	The draft Core Strategy is neither legally compliant nor sound as it does not reflect the Council's evidence base in a number of ways, in particular, with regards its approach to housing delivery.
	The draft Core Strategy does not appear to plan for economic growth which is contrary to the principles underpinning the NPPF.
	With regards housing provision, the Council's evidence suggests a requirement of 220 dwellings per annum (NLP) but our own independent research identifies that there is actually scope for in the order of 310 dwellings per annum. Therefore, the overall residential requirement over the plan period should be a minimum of 4,200 dwellings, but if the Council is planning for economic growth (in line with NPPF) then the housing requirement should be more in the order of 6,200 dwellings over the plan period.
	The Council's evidence base points to apportionment based around existing key service centres, namely Clitheroe, Whalley and Longridge, i.e. to benefit from, sustain and potentially improve access to existing services, facilities and public transport. This points to even apportionment in key centres but the Council's approach is to suppress growth outside of Clitheroe with 50% of new development being focused into Clitheroe. There is a significant lack of evidence that supports this approach which will result in an unsustainable pattern of development and will undermine delivery of growth in other key centres, to the detriment of meeting inter alia local housing needs. On this basis, we can only conclude the approach is politically motivated rather than based on a sound evidence.
	Overall, the Council should plan to deliver between 4,200 and 6,200 dwellings over the next 20 years, with 25%-30% of this growth apportioned to the key service centre of Whalley. In order to demonstrate deliverability of this approach, strategic sites should be identified to ensure development in the most appropriate locations comes forward. In this regard, the Lawsonsteads site represents a suitable and sustainable location for meeting planned growth in Whalley.
Barrow Lands Company Ltd	Consider that the housing requirement is far too low and will not meet identified need or address affordability issues and the under-provision of

NAME	ISSUES RAISED
(David Lock Associates)	housing experienced in the recent years. The requirement is not justified or consistent with National Policy and is fundamentally unsound.
	Policy H3 will not address identified need given the scale of housing requirement proposed.
	The development strategy does not represent the most appropriate strategy and is unjustified. It is too reliant on the Strategic site and ignores the potential of Barrow as a receptor for housing growth given the relationship with strategic employment land.
	The strategic site to the exclusion of Barrow is unjustified. Deliverability is not evidenced and there is inadequate assessment of its impacts upon heritage assets. The site has poor connectivity to Clitheroe and insufficient jobs to serve the population within Standen.
	Querying size of strategic site- believe that the site has increased from previously published location plan.
	SHLAA shows the Barrow site as not available immediately but the site now is. Considers SHLAA should be re-written.
	Approach to affordable housing is a narrow approach with no justification as to why.
	Considers that Barrow has not been given adequate weight in choosing where to locate new housing growth and that housing should not be distributed on basis of existing population.
	Barrow should be named as not just 'other settlements' with an allocation for a minimum of 500 homes.
	Wording of policy EN5 should be amended to remove "a presumption in favour"
	Believes the housing figures are lower than national projection and are not justified by any evidence and should be increased to at least 330dpa.
	Phased approach to the release of land should not be the approach due to the scale of housing shortage in the borough.
	Photographs used to separate sections of the plan are misleading
	Omission of Barrow from Borough overview is not justified
	Use of inflammatory language in relation to effects of "in migrants" on house prices; misrepresents causes of high house prices. Need to explain role of shortage of housing on house prices; need for more homes and affordable homes in particular
	Need to amend reference to A59 as a key to strategic employment development in the Borough
	Housing requirement should be increased to reflect affordable needs
	Adequacy of Settlement Hierarchy
	An up to date Vision is required
	Distribution of housing
	Absence of timetable for Site Allocations DPD
	Consider there is an error in the justification to DS1 regarding Sustainability Appraisal and explanation of Preferred Option
	Lack of clarity on detailed distribution of remaining housing development
	Preferred Option does not address issues in SA Options report
	Distribution of employment sites within Borough only to key settlements re DS1
	Effect on status of Barrow employment sites of recent housing

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	permissions re EC1
	Status of Barrow as in relation to transport accessibility re DMI2
	Evidence of Infrastructure capability of Standen site re P 76
	Evidence of boundaries, capacity and viability of Standen site as marked on images P77
	Implications of development of Standen on heritage assets DMG1
	Appropriateness of Barrow site for a railway station re SA re 10.6
	Development at Standen re settings of listed buildings re 10.15
	Justification and evidence underlying overall housing requirement figure re 15.1
	Graphic acknowledgement of Barrow Enterprise Zone on Key Diagram p 139
Edward Hine LPA receiver for Papillion Properties Avalon Town Planning (Late Representation)	Concerned at a mis-match between aim of the policy and distribution of development. Deliverability of employment land at the Strategic site is questioned, as is the principle of the proposal for growth at the site at Standen. The amount of employment land at Barrow is too great for the size of the village. There is a need to direct a larger proportion of housing provision to Barrow and acknowledge that it can no longer be a small village. Given the constraints elsewhere it is appropriate to allow development in areas like Barrow.
	The housing requirement is not high enough
	No definition of elderly is provided in the glossary and there is inadequate controls relating to elderly provision
	The policy EC1 does not make reference to Barrow Enterprise Site and the policy should be more closely linked with DS1

Identified changes

Changes to be made to the Core Strategy necessary to deliver a sound plan

Identified changes:
Changes to be made to the Core Strategy necessary to deliver a sound plan

The table below sets out the proposed changes identified in the response to representations, to reflect NPPF or improve clarity and meaning. *Text in Italics/blue represents a proposed insertion* and ~~Strikethrough-Text represents a proposed deletion.~~

No.	Details of change
1	<p>1 Introduction and Context</p> <p>Amend/update para. 1.2 in relation to NPPF/remove references to PPSs</p>
2	<p>2 Understanding the Area</p> <p>Amend second sentence of para. 2.8 as follows:</p> <p>There are 39 293 Biological Heritage Sites, 6 16 Sites of Special Scientific Interest (SSSIs).....</p>
3	<p>2 Understanding the Area</p> <p>Amend para 2.9 as follows:</p> <p>“Equally impressive is Ribble Valley’s unique built heritage. Across the borough there are 21 Conservation Areas, and over 1000 Listed Buildings, 29 Scheduled Ancient Monuments and 4 Registered Historic parks and gardens.” <i>The historic town of Clitheroe has an impressive skyline which includes the Castle set on a limestone knoll.</i> The Ribble Valley village of Ribchester is particularly special as it is built on the site of a Roman station and is home to a superb museum, housing information and artefacts relating to Roman life. Both Whalley and Sawley are also home to Cistercian Abbeys, Billington dates back to Saxon times and a pre-historic burial site was discovered at Worston. <i>The borough also has a significant mill heritage. In the village of Hurst Green, Stonyhurst College is an important heritage asset and significant employer.</i>”</p>
4	<p>2 Understanding the Area</p> <p>Add new text at the end of para 2.24:</p> <p><i>“A more detailed Level 2 SFRA will be required if insufficient land is available to accommodate the required levels of development outside the areas identified as being at risk of flooding”</i></p>
5	<p>3 Setting a Vision for the Area</p> <p>Amend final sentence of para. 3.9 as follows:</p> <p>“The biodiversity of the district will continue to be protected and enhanced with waste reduction, recycling and energy efficiency being promoted.”</p>

6	<p>3 Setting a Vision for the Area</p> <p>Insert sentence at end of sentence 1 of para. 3.9 as follows:</p> <p>“The physical, social, environmental and economic regeneration of Clitheroe, Longridge and Whalley will be supported together with existing retail businesses, whilst also ensuring a high quality retail offer in the key service centres and smaller village settlements, <i>especially where this supports local employment opportunities.</i> Improvements will have been made...”</p>
7	<p>3 Setting a Vision for the Area</p> <p>Amend strategic objective at 3.11 as follows:</p> <p>Respect, protect and enhance the high quality environment and biodiversity in the borough. A large proportion of the Ribble Valley falls within an Area of Outstanding Natural Beauty, it has two Local Nature Reserves, thirteen priority habitats and species, and sixteen Sites of Special Scientific Interest (SSSI) and 293 Biological Heritage Sites. Protection, <i>enhancement</i> and conservation of these will form an important part of the Development Strategy. In addition the area has a rich built heritage with the most <i>more</i> significant elements <i>having statutory protection as designated heritage assets. protected through Conservation Area and Listed Building designations. In addition there may be nationally important but unidentified archaeological assets</i>”</p>
8	<p>3 Setting a Vision for the Area</p> <p>Amend final strategic objective at 3.19:</p> <p>Contribute to local, regional and wider sustainable development, <i>including addressing and mitigating against the impacts of climate change.</i> The overall Development Strategy will incorporate these aims. Development should be located where opportunities to reduce the use of the car can be encouraged. This issue has been gaining in importance over the past few years and has even been linked to issues such as overcoming obesity through the design of and location of developments. Facilitating employment growth in the area and providing more affordable housing will be key themes in addressing sustainability in the borough. <i>In addition, high quality services which meet the needs of the Borough’s communities and support their health, social and cultural well-being will be protected and enhanced.</i></p>
9	<p>4 Development Strategy</p> <p>Amend text at 4.1 (bullet point 1) as follows:</p> <ul style="list-style-type: none"> • Protect and enhance the wider local environment, <i>both natural and built environment, in rural and urban areas.</i>
10	<p style="text-align: center;">4 Development Strategy</p> <p>Amend text at 4.7 to add marked text at end of para. The number of units proposed for the strategic site has been reduced to 1040 dwellings</p>

	<p>over a 20-year period. This will result in an average annual provision of 52 units per year for the site. Phasing of the development will need to be considered and this will be done through the Development Management process including the detailed preparation of associated master plans, together with development and design briefs, working with the landowner <i>and considering the practical implications of, and timing for, the delivery of key infrastructure.</i></p>
11	<p>4 Development Strategy</p> <p>Amend figures at 4.11. Residual figures for Clitheroe, Longridge, Whalley, Standen and Other Settlements will be updated when revised housing figures (monitoring date June 2012) are ready for insertion.</p>
12	<p>Key Statement DS1: Development Strategy</p> <p>Add text to beginning of second para. As follows:</p> <p><i>“In addition to the identified strategic site at Standen, in general, the scale.....”</i></p>
13	<p>Key Statement DS1: Development Strategy</p> <p>Amend final sentence of Key Statement DS1 to reflect the NPPF: “Through this strategy, development opportunities will be created for <i>economic, social and environmental</i> well being and development for future generations”</p>
14	<p>Key Statement DS1: Development Strategy</p> <p>Add new paragraph to supporting text after 4.11 as follows: <i>4.12 The development strategy and the Core Strategy as a whole seek to deliver sustainable development. In particular this demonstrates the economic, social and environmental roles that planning has in contributing to sustainable development.</i></p>
15	<p>Key Statement DS2: Presumption in Favour of Sustainable Development</p> <p>Add new policy DS2:</p> <p><i>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</i></p> <p><i>Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</i></p> <p><i>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</i></p>

	<ul style="list-style-type: none"> • <i>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</i> • <i>Specific policies in that Framework indicate that development should be restricted.</i>
16	<p>Key Statement EN3: Sustainable Development and Climate Change</p> <p>Add new paragraph after the second paragraph:</p> <p><i>"New development in vulnerable areas should ensure that risks can be managed through suitable measures, including through the conservation of biodiversity, improvement of ecological networks and the provision of green infrastructure."</i></p>
17	<p>Key Statement EN3: Sustainable Development and Climate Change</p> <p>Add new paragraph after third paragraph</p> <p><i>Ribble Valley Borough Council will liaise with the County Council over development within Mineral Safeguarding Areas (MSAs) in both proposing future site allocations and in determining planning applications. This liaison will include consideration of the issue of preventing the unnecessary sterilisation of mineral resources within MSAs and, where feasible and practicable, the prior extraction of mineral resources.</i></p>
18	<p>Key Statement EN3: Sustainable Development and Climate Change</p> <p>Add new sentence to end of para. 5.3:</p> <p>Lancashire County Council has responsibility for the designation of Mineral Safeguarding Areas, which will be shown on the Proposals Map for Ribble Valley Borough Council.</p>
19	<p>Key Statement EN4: Biodiversity and Geodiversity</p> <p>Add new sentence to end of first paragraph</p> <p>"Where appropriate, cross-Local Authority boundary working will continue to take place to achieve this".</p>
20	<p>Key Statement EN4: Biodiversity and Geodiversity</p> <p>Amend second paragraph:</p> <p><i>"Negative impacts on biodiversity through development proposals should be avoided. Development Proposals that adversely affect a site of recognised environmental or ecological importance will only be permitted where a developer can demonstrate that the negative effects of a proposed development can be mitigated, or as a last resort, compensated for. This could be managed through a variety of mechanisms such as conservation credits....."</i></p>

21	<p>Key Statement EN4: Biodiversity and Geodiversity</p> <p>Amend third paragraph/bullet list of policy as follows:</p> <p>These sites are as follows:</p> <ul style="list-style-type: none"> • Sites of Special Scientific Interest (SSSIs) • Local Nature Reserves (LNRs) • County Local Biological Heritage sites (CBHs) • Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) • Local Geodiversity Heritage Sites • Ancient Semi-Natural Woodlands • Lancashire Biodiversity Action Plan priority habitats and species • European Directive on Protected Species and Habitats - Annex 1 Habitats and Annex II Species • Habitats and Species of Principal Importance in England
22	<p>Key Statement EN4: Biodiversity and Geodiversity</p> <p>Add new final sentence at end of final paragraph:</p> <p><i>For those sites that are not statutorily designated any compensation could be managed through a mechanism such as biodiversity off-setting via conservation credits.</i></p>
23	<p>Key Statement EN5: Heritage Assets</p> <p>Amend Key Statement EN5: Heritage Assets to read as follows:</p> <p>There will be a presumption in favour of the preservation of heritage assets and their settings where they are recognised as being of importance.</p> <p>The Historic Environment and its Heritage Assets and their settings will be conserved and enhanced in a manner appropriate to their significance for their heritage value; their important contribution to local character, distinctiveness and sense of place; and to wider social, cultural and environmental benefits.</p> <p><i>This will be achieved through:</i></p> <ul style="list-style-type: none"> • The Authority Recognisinges that the best way of ensuring the long term protection of heritage assets is to find an optimum viable use that strikes the correct balance between economic viability or other uses and their impact on the significance of the asset. • Keeping Conservation Area Appraisals will be kept under review to ensure that any development proposals respect and safeguard are in keeping with the historic character and architectural interest of the area the character, appearance and significance of the area. • Carefully considering any development proposals that adversely affect a designated heritage asset or its setting will be given careful consideration in line with the Development Management policies.

	<ul style="list-style-type: none"> • <i>Requiring all development proposals to make a positive contribution to local distinctiveness/sense of place.</i> • <i>The consideration of Article 4 Directions to restrict permitted development rights where the exercise of such rights would harm the historic environment.</i> <p>Note: final policy wording subject to agreement with English Heritage</p>
24	<p>Key Statement EN5: Heritage Assets</p> <p>Amend first sentence of 5.5 as follows:</p> <p>The SA Scoping report highlighted a need to protect and enhance the historic environment of Ribble Valley. <i>This includes heritage assets and their settings.</i></p>
25	<p>Key Statement H2: Housing Balance</p> <p>Planning permission will only be granted for residential development providing it can be demonstrated that it delivers a suitable mix of housing that accords with the projected future household requirements and local need across the Ribble Valley as a whole as evidenced by the Strategic Housing Market Assessment. Determination of planning applications for residential development will be informed by the most recent Housing Needs Surveys, Addressing Housing Needs statement and the most recently adopted SHMA, to identify the type, tenure and size of residential dwellings, required at different locations throughout the borough, <i>as well as reference to relevant housing market information as appropriate.</i></p>
26	<p>7 Economy</p> <p>Add sentence at the end of sentence 7.4 as follows:</p> <p><i>The Council considers Barrow Enterprise Pak to be an important employment land resource that has the significant potential to provide for economic growth and deliver sustainable development for the borough.</i></p>
27	<p>7 Economy</p> <p>Amend penultimate sentence of 7.4 as follows:</p> <p>“Growth at the BAe Samlesbury site is anticipated to occur given that it is a regionally significant site and now intended to form part of the Lancashire Enterprise Zone”.</p>
28	<p>Key Statement EC1: Business and Employment Development</p> <p>Amend final sentence of last paragraph</p> <p>“The Council considers, in line with neighbouring authorities and other bodies that the BAe Samlesbury site is a regionally significant employment site with considerable</p>

	<p>potential to accommodate a variety of advanced knowledge based industries in the future. This has been recognised by the Government’s proposal to create creation of an Enterprise Zone at this location”. <i>As such the site is not considered part of the boroughs general employment land supply.</i></p>
29	<p>Key Statement EC2: Development of Retail, Shops, and Community Facilities and Services</p> <p>Further supporting text to be added to 7.12 as follows:</p> <p>This is predominantly led by evidence base research that confirms the requirement for the development of retail, shops and the facilities on offer. <i>The NPPF identifies a range of uses that are appropriate to the town centre which contribute to their vitality and viability and include retail, leisure, commercial, office, tourism, community, cultural and residential uses.</i> The Clitheroe Town Centre Masterplan will inform the preparation of more detailed policies as appropriate. Recommendations and suggestions from this work will be disseminated across the borough where applicable.</p>
30	<p>8 Delivery Mechanisms and Infrastructure</p> <p>Amend para 8.3 to add text at end of para</p> <p>Each have had the opportunity to contribute to the development of the evidence base for the LDF and in drawing up the options presented at this stage. As the preferred strategy is formed and greater certainty is established these groups and bodies will be involved further as detail is established. <i>The need for infrastructure improvements has been identified in the infrastructure plan. The exact implications for infrastructure can only be determined once more detail on the location of the sites and the nature of the development is known. This allows a better understanding of the implications for infrastructure and the identification of holistic solutions in the context of all the development that is proposed in an area through the details established in the site allocations development plan document. It is clear that the phasing of development will be necessary to ensure the capacity of infrastructure can be enhanced.</i></p>
31	<p>8 Delivery Mechanisms and Infrastructure</p> <p>Remove tenth bullet point from 8.7</p> <p>• Minerals and Waste Development</p>
32	<p>Key Statement DMI2: Transport Considerations</p> <p>Insert new text in second para as follows:</p> <p>“In general, schemes offering opportunities for more sustainable means of transport <i>and sustainable travel improvements</i> will be supported. Sites for potential future railway stations at Chatburn and Gisburn will be protected from inappropriate development.”</p>
33	<p>Key Statement DMI3: Development Management</p> <p>Delete policy text box DMI1: Development Management</p>

	To help determine planning applications and deliver the vision and objectives of the Core Strategy, the Council will apply a range of Development Management policies.
34	<p>9 Strategic Site</p> <p>Amend 3rd and 4th paragraphs of text underneath text in highlighted box</p> <p>Work undertaken on infrastructure planning as part of the Core Strategy process has shown that in principle, there are no significant barriers to the development and that the site is deliverable within the plan period <i>with appropriate phasing of the development to allow infrastructure enhancements to be co-ordinated and delivered</i>. It is envisaged that the site will be accessed by a minimum of two access points from the existing local highway network with a through route for public transport. The development will also necessitate <i>secure</i> improvements to the strategic highway network at the A59/Clitheroe Road/Pendle Road Junction. Any development should take account of the presence of <i>heritage assets within and in the vicinity of the site, including</i> the line of the Roman Road that runs through the site, which is of archaeological and historic significance. There will be a need for high quality structural landscaping to contribute a good quality development and address the landscape impacts of a development of this scale. <i>On the basis of currently known development in the area and regulatory requirements, United Utilities has stated that the development of this strategic site would necessitate the need for improvements in water and wastewater infrastructure and has therefore identified a need for appropriate phasing to allow for the practical implications associated with infrastructure enhancement.</i></p> <p>The Core Strategy is seeking to identify the site in principle. and t.The precise mix of uses, developable areas, and development, <i>detailed infrastructure requirements and the need for phasing</i> will be determined in more detail in subsequent Development Plan Documents, Supplementary Planning Documents which will be subject to separate consultation and through the Development Management process.</p>
35	<p>10: Development Management policies</p> <p>Presentation of the text will be amended to make clearer what is policy and what is reasoned justification for all Development Management policies (chapter 10).</p>
36	<p>Key Statement DMG1: General Considerations</p> <p>Insert new bullet point between 6th and 7th bullet points as follows:</p> <ul style="list-style-type: none"> <i>“Consider the protection and enhancement of public rights of way and access”.</i>
37	<p>Key Statement DMG1: General Considerations</p> <p>Replace 7th bullet point:</p> <ul style="list-style-type: none"> • Also consider the implications of development on heritage assets such as Scheduled Ancient Monuments, listed buildings, conservation areas, registered

	<p>parks and gardens.</p> <ul style="list-style-type: none"> • All development must protect and enhance heritage assets and their settings.
38	<p>Key Statement DMG1: General Considerations</p> <p>8th bullet point to be amended:</p> <ul style="list-style-type: none"> • “With regards to possible effects upon the natural environment, the council propose that the principles of the mitigation hierarchy be followed. This gives sequential preference to the following: 1) enhance the environment 2) avoid the impact 3) minimise the impact 4) restore the damage 5) compensate for the damage 6) offset the damage”
39	<p>Key Statement DMG1: General Considerations</p> <p>11th bullet point to be amended:</p> <ul style="list-style-type: none"> • Consider the density, layout and relationship between buildings, which is of major importance. Particular emphasis will be placed on visual appearance and the relationship to surroundings, including impact on landscape character, as well as the effects of development on existing amenities.
40	<p>Key Statement DMG1: General Considerations</p> <p>Add new bullet point.</p> <ul style="list-style-type: none"> • Consider the potential impact on social infrastructure provision
41	<p>Key Statement DMG1: General Considerations</p> <p>Bullet point one to be amended to state the following:</p> <ul style="list-style-type: none"> • Be of a high standard of building design which considers the 8 building in context principles (from the CABE/ English Heritage building on context toolkit)
42	<p>Key Statement DMG1: General Considerations</p> <p>Amend bullet 17 and add a new bullet 19 as follows</p> <ul style="list-style-type: none"> • Consider the potential impacts of development on air quality and mitigate adverse impacts where possible. • The Code for Sustainable Homes and Lifetime Homes should be incorporated into schemes. • Have regard to the availability of key infrastructure with capacity. Where key infrastructure with capacity is not available it may be necessary to phase development to allow infrastructure enhancements to take place.

43	<p>Key Statement DMG2: Strategic Considerations</p> <p>Need to insert a definition of “Settlement” within Glossary to allow full understanding of this and other policies that refer to settlement</p> <p>Additional paragraph to be added at end of 10.5:</p> <p>For the purposes of this policy the term settlement is defined in the Glossary. Current settlement boundaries will be updated in subsequent DPDs.</p> <p>Definitions of “consolidate”, “expansion” and “rounding off” to be included in the Glossary.</p>
44	<p>Key Statement DMG3: Transport and Mobility</p> <p>Amend first bullet point:</p> <ul style="list-style-type: none"> • “the availability and adequacy of public transport <i>and associated infrastructure</i> to serve those moving to and from the development”
45	<p>Key Statement DMG3: Transport and Mobility</p> <p>Amend third bullet point:</p> <ul style="list-style-type: none"> • Proposals which promote development within existing developed areas <i>or extensions to them</i> at locations which are highly accessible by means other than the private car.
46	<p>Key Statement DMG3: Transport and Mobility</p> <p>Further supporting text to be added at the end of Key Statement DMG3: “In using this policy reference will be made to the Guidance on Transport Assessments. <i>This should also include an assessment of the impacts on existing bus and rail infrastructure, including level crossings. Where necessary developers will be expected to contribute towards improvements in public transport provision and infrastructure.</i>”</p>
47	<p>Key Statement DME1: Protecting Trees and Woodlands</p> <p>Text will be added to at end of first paragraph of 10.7 as follows: <i>“The Council encourages successional tree planting to ensure tree cover is maintained into the future”</i></p>
48	<p>Key Statement DME1: Protecting Trees and Woodlands</p> <p>Amend text at para. 10.10 to include additional wording. as follows: “Veteran and Ancient Trees The Borough Council will take measures through appropriate <i>planning conditions</i>, legislation and management regimes to ensure that any tree classified identified as veteran/ancient tree is afforded sufficient level of protection and appropriate management in order to ensure its long term survivability”.</p>

49	<p>Key Statement DME2: Landscape and Townscape Protection</p> <p>Amend first sentence of 10.13:</p> <p>Development proposals will be refused which <i>significantly</i> harm important landscape or landscape features including</p>
50	<p>Key Statement DME2: Landscape and Townscape Protection</p> <p>Add new bullet point to DME2 para. 10.13 as follows:</p> <ul style="list-style-type: none"> • <i>Upland landscapes and associated habitats such as blanket bog</i>
51	<p>Key Statement DME2: Landscape and Townscape Protection</p> <p>Add new bullet point to list a 10.13 of DME2 as follows:</p> <ul style="list-style-type: none"> • <i>botanically rich roadside verges (that are worthy of protection)</i>
52	<p>Key Statement DME2:Landscape and Townscape Protection:</p> <p>Amend second sentence of final paragraph of 10.13 as follows:</p> <p>In applying this policy reference will be made to a variety of guidance including the Lancashire County Council Landscape Character Assessment, <i>the AONB Landscape Character Assessment 2010</i> and the AONB Management Plan.</p>
53	<p>Key Statement DME3: Sites and Species Protection and Conservation</p> <p>Amend final two sentences of 10.14 as follows:</p> <p>In terms of the protection of the soil resource and high quality agricultural land development and land management practices should seek to avoid soil erosion; avoid contamination of land and promote restoration, protect the peat resource and recognise the importance of peat in particular for its carbon sequestration value, <i>water quality improvements for both drinking water and biodiversity, reduction of local flood risk and reduction of moorland wildfire risk. The and recognises the</i> important link between soil quality, the natural environment and the landscape <i>should be recognised.</i></p>
54	<p>Key Statement DME4: Protecting Heritage Assets</p> <p>Amend opening sentence of Key Statement DME4 as follows:</p> <p>10.15 In considering development proposals the Council will make a presumption in favour of the preservation of important <i>protection and enhancement of</i> heritage assets and their settings.</p>
55	<p>Key Statement DME4: Protecting Heritage Assets</p> <p>Amend text at 10.15 of DME4</p>

	<p>Conservation Areas</p> <p>Proposals within or closely related to Conservation Areas should not harm the Area. This should include considerations as to whether it is in keeping with respects and safeguards the architectural and historic character of the area as set out in the relevant Conservation Area Appraisal. Development in these areas will be strictly controlled to ensure that it reflects respects the character of the area in terms of its location, scale, size, design and materials and also respects trees and important open space existing buildings, structures, trees and open spaces .</p> <p>In the Conservation Areas there will be a presumption in favour of the preservation of elements that make a positive contribution to the character or appearance of the Conservation Area.</p> <p>Listed Buildings and Other Buildings of Significant Heritage Interest</p> <p>Development proposals on sites within the setting of listed buildings or buildings of significant heritage interest, which cause visual harm to the setting of the building, will be resisted. Any proposals involving the partial or full demolition of or loss of important historic fabric from listed buildings will be refused unless it can be demonstrated that this is unavoidable.</p> <p>Registered <i>Historic</i> Parks and Gardens of Special Historic Interest <i>and other Gardens of Significant Heritage Interest</i></p> <p>Developments within or immediately adjacent to registered parks and gardens will be expected to take their special qualities into account and, where appropriate, to make a positive contribution to them.</p> <p><i>Proposals affecting Registered Historic Parks and Gardens and Other gardens of significant heritage interest, or their settings, should respect and safeguard their character.</i></p> <p>Scheduled Monuments</p> <p>Applications for development that would impact a Scheduled Monument will need to demonstrate that they have taken the particular importance of the monument and its setting into account and that Scheduled Monument Consent has either already been obtained or is likely to be granted. Planning Policy Statement 5 (PPS5) and its associated practice guide, National policy gives additional policy guidance on dealing with both designated and undesignated heritage assets, and will be applied by the Council when determining proposals. Proposals that affect such sites as those mentioned above should also give adequate consideration of how the public understanding and appreciation of such sites could be improved.</p> <p>Note: final policy wording subject to agreement with English Heritage</p>
56	<p>Key Statement DME4: Protecting Heritage Assets</p> <p>Include the following text at the end of policy DME4 (new paragraph following paragraph relating to Scheduled Monuments)</p> <p><i>In line with NPPF, Ribble Valley aims to seek positive improvements in the quality of the historic environment through the following:</i></p> <p>a) <i>Monitoring heritage assets at risk and;</i> <i>i) supporting development/ re-use proposals consistent with their conservation;</i></p>

	<p><i>ii) considering use of legal powers (Building Preservation Notices, Urgent Works Notices) to ensure the proper preservation of listed buildings and buildings within conservation areas.</i></p> <p><i>b) Supporting redevelopment proposals which better reveal the significance of heritage assets or their settings</i></p> <p><i>c) production of design guidance</i></p> <p><i>d) Keeping conservation area management guidance under review</i></p> <p><i>e) Use of legal enforcement powers to address unauthorised works where it is expedient to do so.</i></p> <p>Note: final policy wording subject to agreement with English Heritage</p>
57	<p>Key Statement DME5: Renewable Energy</p> <p>Delete second bullet point at 10.16 (it is a repeat of the first)</p> <p>• The immediate and wider impact of the proposed development on the landscape, including its visual impact and the cumulative impacts of development</p>
58	<p>Key Statement DME5: Renewable Energy</p> <p>Add additional bullet point at 10.16</p> <ul style="list-style-type: none"> • <i>The potential impact on biodiversity</i>
59	<p>Key Statement DME5: Renewable Energy</p> <p>Add further sentence to the end of second paragraph of 10.16 as follows:</p> <p>This target will be updated in line with national targets. Implementation of this requirement will be monitored and enforced by the planning authority. <i>The Council will also have regard to the AONB Renewable Energy Position Statement 2011 in assessing proposals.</i></p>
60	<p>Key Statement DME5: Renewable Energy</p> <p>Add reference to Biological Heritage Sites to penultimate paragraph of 10.16 as follows: “Development proposals within or close to the AONB, Sites of Special Scientific Interest, Special Areas of Conservation and Special Protection Areas, notable habitats and species, Local Nature Reserves, <i>Biological Heritage Sites</i> or designated heritage assets and their setting will not be allowed unless:”</p>
61	<p>Key Statement DME 6 Water Management</p> <p>Add new para at end</p> <p>All applications for planning permission should include details for surface water drainage and means of disposal based on sustainable drainage principles. The use of the public sewerage system is the least sustainable form of surface water drainage and therefore development proposals will be expected to investigate and identify more sustainable alternatives to help reduce the risk of surface water</p>

	flooding and environmental impact.
62	<p>Key Statement DMH2: Gypsy and Traveller Accommodation</p> <p>Amend final bullet point and add two additional bullet points as follows:</p> <ul style="list-style-type: none"> • Proposals must have good access <i>and not have an adverse impact on highway safety</i> • <i>Proposals should not place undue pressure on local infrastructure and services</i> • <i>Proposals are not located in areas at high risk of flooding</i> •
63	<p>Key Statement DMH3 Dwellings in the Open Countryside</p> <p>Amend title to Dwellings in the Open Countryside and AONB</p> <p>Also amend para 10.20 first sentence to</p> <p>Within areas defined as Open Countryside <i>or AONB</i> on the proposals map...”</p> <p>Also amend final para to: The creation of a permanent dwelling by the removal of any condition that restricts the occupation of dwellings to tourism/visitor use or for holiday use will be refused <i>on the basis of un-sustainability.</i></p>
64	<p>Key Statement DMH4: The Conversion of Barns and Other Buildings to Dwellings</p> <p>Add to the following bullet point after first five bullet points at 10.21</p> <ul style="list-style-type: none"> • <i>That any existing nature conservation aspects of the existing structure are properly surveyed and where judged to be significant preserved or, if this is not possible, then any loss adequately mitigated.</i>
65	<p>Key Statement DMH5: Residential and curtilage extensions</p> <p>Add in the following at the start of the last sentence in 10.22 (DMH5)</p> <p><i>Any existing nature conservation aspects of the existing structure should be properly surveyed and where judged to be Significant preserved or, if this is not possible, then any loss adequately mitigated.</i></p> <p>Also amend last para to</p> <p>Proposals to extend a curtilage in other circumstances will not be approved other than where it will support the health of the local economy <i>or for highway safety reasons.</i></p>

66	<p>Key Statement DMB4: Open Space Provision</p> <p>Text at second sentence of para 10.26 to be amended as follows: On all residential sites of over 1 hectare, the layout will be expected to provide adequate and usable public open space. On a site-by-site basis, the Council will also negotiate for provision on smaller sites, or seek to secure a an off-site contribution towards provision for sport and recreational facilities or public open space within the area where the overall level of supply is inadequate.</p>
67	<p>Key Statement DMB5: Footpaths and Bridleways</p> <p>Add new sentence at the end of the first sentence at para. 10.27 as follows: “In situations where a public right of way will inevitably become less attractive (due to adjacent/surrounding development), the policy should require compensatory enhancements such that there is a net improvement to the public right of way network.”</p>
68	<p>Key Statement DMR2: Shopping in Longridge and Whalley</p> <p>Amend policy as follows: “Proposals for new small scale shopping developments including expansion of existing facilities will be approved on sites which are physically closely related to existing shopping facilities. All proposed shopping developments, will be subject to other relevant policies in the plan and the Borough Council will have particular regard to the effect of the proposals on the character and amenities of the centre and the consequences in respect of vehicular movement and parking.</p> <p>Longridge and Whalley will continue to be the other main shopping areas of the Borough. Their size and facilities are more closely related to local shopping needs than those of Clitheroe. However it is recognised that Longridge serves a wide hinterland. This may change...”</p>
69	<p>11: Monitoring</p> <p>1. Respect, protect and enhance the high quality environment and biodiversity in the Borough: Amend source of monitoring indicator 1.4 from LCC to ‘AMR’</p>
70	<p>11: Monitoring</p> <p>1. Respect, protect and enhance the high quality environment and biodiversity in the Borough: Add new indicators 1.5 and 1.6 to monitoring framework: 1.5 Number of applications granted contrary to Natural England advice 1.6 The number or proportion of the population that has full access to the requirements of the Accessible Natural Green space Standard.</p>
71	<p>12 Glossary</p> <p>Definition of Biological Heritage Site to be amended:</p> <p>BIOLOGICAL HERITAGE SITE - A national designation A county designation given weight through the NPPF that carries with it certain obligations on the Local Planning Authority when formulating policy or assessing planning applications.</p>

72	<p>12 Glossary</p> <p>Definition of “community facilities” to be added to glossary as follows:</p> <p><i>Community Facilities: Facilities which provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community</i></p>
73	<p>12 Glossary</p> <p>Definition of “Heritage Assets”, “Setting of Heritage Assets” and “Significance (for Heritage Policy)” to be added to glossary as per NPPF as follows:</p> <p><i>“Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).</i></p> <p><i>Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.</i></p> <p><i>Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”</i></p>
74	<p>12 Glossary</p> <p>Add following definition:</p> <p><i>Elderly provision: Generally taken as provision for people aged 55 years or over.</i></p>
75	<p>12 Glossary</p> <p>Amend following definition:</p> <p>FIVE-YEAR SUPPLY - Each Local Planning Authority is required to demonstrate a five-year supply of land for housing <i>based upon the appropriate strategic requirement. The five year supply position is monitored on a quarterly basis..</i> Ribble Valley is required to provide 161 residential units each year and therefore is required to demonstrate that 805 units (161x5) can be provided. If a five-year supply cannot be demonstrated then it becomes difficult to resist applications for residential development, even if they are not suitable.</p>
76	<p>12 Glossary</p> <p>Remove references to:</p> <ul style="list-style-type: none"> ● PPS—Planning Policy Statements ● PPS1

	<ul style="list-style-type: none"> • PPS 3 • PPS12 • PPS 25
77	<p>12 Glossary</p> <p>Add reference to:</p> <p><i>NPPF- National Planning Policy Framework. This contains the Government’s planning policies for England and must be taken into account in preparing local and neighbourhood plans and is a material consideration in planning decisions. The NPPF was issued in March 2012 and supersedes guidance formerly contained in Planning Policy Statements and Guidance (PPS and PPGs).</i></p>
78	<p>12 Glossary</p> <p>Add a definition of “Settlement”. This will be the definition currently used in the District Wide Local Plan (see page 13, para 3.2.15 of the Local Plan) which was used to define village boundaries in the area and is considered to remain an adequate guide to settlements. It is</p> <p><i>A settlement for the purposes of this plan is an area that:</i></p> <ul style="list-style-type: none"> • <i>Includes all properties physically linked to the main (built) part of the settlement</i> • <i>Includes all undeveloped areas of existing planning consents relating to the settlement</i> • <i>Includes residential curtilages</i> • <i>Boundaries do not include properties separated from the main body of the settlement by areas of open land not forming a residential curtilage</i> • <i>In most cases single depth development (ribbon development) along roads leading out of settlements will be excluded unless they are physically well related to the settlement</i>
79	<p>12 Glossary</p> <p>Add definitions of <i>Consolidation, Expansion and Rounding off</i> (as per saved Local Plan)</p>
80	<p>12 Glossary</p> <p>Replace reference to Affordable Housing Memorandum of understanding (AHMU) with <i>Addressing Housing Need.</i></p>
81	<p>12 Glossary</p> <p>Add to definition of Open Countryside</p> <p>This is a designation <i>currently defined</i> within <i>the proposals map of</i> the RV Districtwide Local Plan mainly of land outside Settlement Areas but not designated Greenbelt or AONB.</p>

82	<p>13 Evidence Base Documents</p> <p>Add new sentence under chapter heading. Create new 13.1. Text as follows:</p> <p><i>13.1 In addition the Council has drawn on information submitted through extensive consultation, which is available for reference.</i></p>
83	<p>13 Evidence Base Documents</p> <p>Add:</p> <p style="text-align: center;">Addressing Housing Need in Ribble Valley June 2011 (RVBC) CABE/English Heritage Building in Context Toolkit Employment Land position Statement June 2011 (RVBC) Forest of Bowland AONB Renewable Energy Statement 2011</p> <p><i>G6 Essential Open Space Designation Audit 2011 (RVBC)</i> <i>LCC Historic Environment Record</i> <i>LCC Extensive Urban Survey reports</i></p>
84	<p>15 Appendices</p> <p>Amend footnote 20 at 15.1 of Appendix 2 to explain which are the other 32 settlements</p>
85	<p>15 Appendices</p> <p>Amend figures for housing requirement and distribution to reflect most up to date monitoring period (June 2012) once figures are ready for insertion.</p>
86	<p>Miscellaneous</p> <p>Any other minor textual/typographical/editorial/factual updates</p>
87	<p>Miscellaneous</p> <p>Amend any necessary issues relating to compliance with NPPF in relation to Wildlife Trust comments or other.</p>
88	<p>Miscellaneous</p> <p>Development Management policies: need to clarify what is policy/supporting text</p>