



CPRE

CAMPAIGN TO PROTECT  
RURAL ENGLAND



## Lancashire Branch, including Merseyside and Greater Manchester

[www.cprelancashire.org.uk](http://www.cprelancashire.org.uk)

*working locally and nationally for a  
beautiful and working countryside*

HED DPD Reg 19 Publication consultation  
Council Offices  
Church Walk  
Clitheroe  
Lancashire  
BB7 2RA

8 June 2017

Dear Local Plan Team,

1. The Lancashire Branch of the Campaign to Protect Rural England is delighted to respond to the consultation concerning: A Local Plan for Ribble Valley 2008 - 2028: Housing and Economic Development- Development Plan Document (HED DPD) Regulation 19 (Publication).
2. CPRE and its members view the English countryside as iconic. It is unique, essential and precious, and it's in danger. Every year, a little more is lost forever to urban sprawl, new roads, housing and other developments. Rural shops and services are under pressure and intensive farming is changing the character of the countryside. Based on evidence, we believe climate change will have serious impacts on the rural environment and local plan policies must address this important environmental issue.
3. The Ribble Valley is renowned for its beautiful rural landscapes and is home to the Forest of Bowland Area of Outstanding Natural Beauty and no less important to many the other 'ordinary' countryside that must also be protected and enhanced in the future.
4. CPRE advocates local plan making to form the legal bedrock of all local planning decisions. Local plan policies and allocations should accord with the National Planning Policy Framework (NPPF) and enable sustainable development within local environmental limits. And, it should not be forgotten that environmental capacity issues include air quality and carbon emissions.
5. Essentially CPRE supports 'smart growth', the right development, in the right places for the right reasons. We ought to identify where needed development should go based on sound town and country planning principles, such as urban concentration, reliance on sustainable travel patterns, improvement of existing infrastructure, reuse of previously developed (brownfield) land and provision of high quality green spaces to achieve true sustainable development.

6. CPRE is keen to see that local planning authorities have properly exercised the new 'duty to co-operate' to ensure 'strategic issues' are adequately addressed and by doing so ensure greenfield development, particularly Green Belt loss, is avoided, minimised or where absolutely unavoidable is adequately planned. We believe policies need to require adequate community infrastructure, such as affordable housing, school places, public transport to be provided to ensure development is sustainable in the long term. New development ought to be designed to enhance the natural environment and reflect local character.

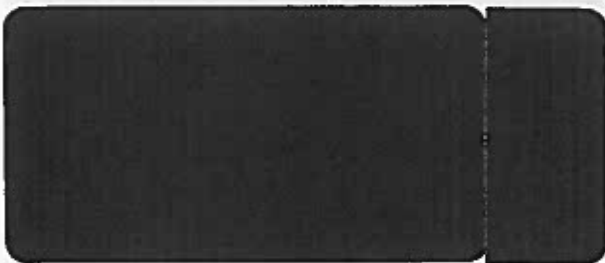
7. Our key points concerning rural issues, as set out below:

*Housing and Economic Development DPD Publication version*

Key Statement DS1: Development Strategy

8. CPRE Lancashire is broadly supportive of Key Statement DS1: Development Strategy in allocating development, the Council will have regard to the AONB, Green Belt and similar designations when establishing the scale, extent and form of development to be allocated under this strategy. The relevant constraints are set out as part of the strategic framework included in this plan.
9. Naturally, CPRE Lancashire agrees that enough needed homes should be planned over the plan period. We do however express concern over the assumptions used in the calculations and believe there is justification to plan for a reduced number of homes. Developers have an interest in pushing for high housing 'demand' figures to boost the amount of land with permission for housing for profit motive rather than housing provision and this is not the same as housing 'need'. CPRE has evidenced the problem of bloated housing figures, see here: <http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4158-set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside> .
10. Ribble Valley Borough Council may well 'set itself up to fail'. The Council will be assessed against this high Housing Requirement figure in the future. It should be remembered that the Council can only allocate land and process applications, it cannot actively build itself. Developers have a 'trump card' with the operation of five year housing land supply rule and are able (arguably unfairly) to pursue the development of land never intended for development if the Council is identified as 'failing', to achieve an impossibly high Housing Requirement. In this way the National Planning Policy Framework, 2012 unfairly promotes development of greenfield land in the countryside, in advance of brownfield.
11. CPRE Lancashire has been advocating to the Government changes to improve the NPPF, and seeks a more cautious 'plan, monitor and manage' approach rather than the current crude 'predict and provide' and the phasing of housing delivery to test whether in reality the employment and housing is needed, before allocating land in the countryside.
12. CPRE agrees that adequate affordable housing and types of homes suitable for aging population, especially in rural communities, should be built.

13. Like most people, CPRE Lancashire prefers urban brownfield land to be used in advance of greenfield land in the countryside. However where needed development cannot be met through existing brownfield land we prefer to see planned urban extension of settlements, rather than speculative application of open countryside.
14. Under DS1, CPRE Lancashire calls for an improved policy reference to effectively encourage the reuse of brownfield land in urban areas in advance of greenfield land in the countryside. In recent times we have witnessed a worrying trend of speculative applications on farmland never intended for development by housing developers aggressively pursuing consents at appeal against local wishes. Often this promotes an acceleration of countryside loss, in unsustainable locations. What is more it fails to deliver much needed affordable housing and the community facilities required to make a place truly sustainable.
15. We are concerned that the Tier 1 Villages are planned to have suitable community facilities especially sustainable public transport links and convenience shopping to limit the number of additional trips on the local road network which is predominately rural and comprised of country lanes.
16. The Tier 2 Village settlements are in a number of cases very small settlements. New development must include affordable homes and be sensitively designed, using local styles and materials. We encourage Neighbourhood Plans to be made by parish councils to provide additional planning policy covering the issue of 'distinctiveness' and design aspects to ensure the new development best protects and enhances rural settlements.
17. We strongly advocate the proper masterplanning of HAL1 Land off Mellor Lane (adjacent to Weavers Fold), Mellor (0.29ha) and HAL2 Land at Wilpshire (5.67ha) to ensure adequate green infrastructure and open space within the housing developments to ensure a good tradition of quality place making. There should be protection for trees, hedgerows and other elements that have a positive value to landscape, flood risk and ecology, among other factors. An explicit reference to masterplanning is needed in the local plan policy wording.
18. We wish the Council every success with progressing a sound local plan to enable 'needed' development to come forward in sustainable locations.
19. With our thanks for your consideration of this matter and with kind regards.



Patron  
Her Majesty the Queen  
President  
Emma Bridgewater CBE  
Chairman  
Nick Thompson

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The first stage of the project was to identify the key stakeholders and their interests. This was done through a series of interviews and focus groups. The next stage was to conduct a detailed site analysis, including a topographic survey and a geotechnical investigation. This was followed by the preparation of a preliminary design, which included a site plan and a conceptual layout of the proposed development. The final stage was to prepare a detailed design, which included a full set of architectural and engineering drawings. This was followed by the submission of a planning application to the local planning authority.

The second stage of the project was to obtain planning permission. This was done through a series of consultations with the local planning authority and the public. The third stage was to obtain the necessary consents from the relevant authorities, including the Environment Agency and the Highways Authority. The fourth stage was to commence construction of the development. This was done in accordance with the approved design and in compliance with the relevant building regulations. The fifth stage was to complete the development and hand it over to the client. The sixth stage was to provide a post-project evaluation, which included a review of the project's performance and a report on the lessons learned.

The final stage of the project was to provide a post-project evaluation. This was done through a series of interviews and focus groups with the client and the project team. The evaluation report identified the strengths and weaknesses of the project and provided recommendations for future projects. The project was completed on time and within budget, and the client was satisfied with the results.

The project was a success, and the client was very pleased with the results. The project team was praised for their hard work and dedication. The project was a valuable experience for the team and provided a number of lessons learned. The project was a success because of the team's hard work and dedication, the client's support, and the local planning authority's cooperation. The project was a valuable experience for the team and provided a number of lessons learned. The project was a success because of the team's hard work and dedication, the client's support, and the local planning authority's cooperation.

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