Before using this form to make any comments please ensure that you have read the Core Strategy document and the Guidance Notes, which can be found on Ribble Valley Borough Council's website - www.ribblevalley.gov.uk and follow the Core Strategy link. If after reading the Guidance Notes you should have any queries in completing the form please telephone 01200 425111.

This form has two parts:
- Part A - Personal Details (you need only complete one copy of Part A)
- Part B - Your comment(s) (Please complete a separate Part B for each comment you wish to make)

All completed comments forms must be received by the Council no later than 5:00pm on Friday 15th June 2012.

Please return paper copies marked 'CORE STRATEGY CONSULTATION' to Council Offices, Church Walk, Clitheroe, BB7 2RA

**Part A**

Q1 Please can you provide the following information which will assist us in contacting you if we need to discuss any of your comments further.

- Name
- Name of Organisation (if you are responding on behalf of an organisation)
- Database Reference number (if you have one)
- Address
- Post Code
- Email address
- Phone number

Copies of all comments made in Part B of the form will be put in the public domain and are not confidential, apart from any personal information. All personal information within Parts A and B will only be used by the Council in connection with the Local Development Framework and not for any other purpose and will be held in accordance with the Data Protection Act 1998. The Council will summarise the comments and all representations will be made available to the Planning Inspectorate.
Please use a separate form for each individual comment.

Q2  Name / Name of Organisation (if you are responding on behalf of an organisation)

Q3  To which part of the Core Strategy does this comment relate?
Part of document eg Key statement reference, 'Vision' section etc...
Paragraph No.

Q4  As a consequence do you consider the Core Strategy is:

   i) Legally compliant

   ii) Sound *

   Yes  [ ]  No  [✓]

* The considerations in relation to the Core Strategy being sound are explained in the Guidance Notes

Q5  If you consider the Core Strategy is unsound, is this because it is not... (please tick the appropriate box)

   Justified
   Effective

   Consistent with national policy  [✓]
   Positively prepared

Q6  Please give details of why you consider that the Core Strategy is not legally compliant or sound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments. Please continue on a separate sheet if required.

PLEASE SEE ATTACHED SHEET
Q7  Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness.

You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible. Please continue on a separate sheet if required.

Please note: your comment should cover succinctly all the information, evidence, and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be another opportunity to make further comments based on the original comment made at the publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination in the forthcoming Examination in Public. Please note also that the Inspector is not obliged to consider any previous comments that have been made in respect of the Core Strategy. You are urged, therefore, to re-submit on this form any previously submitted comments that, in your view, remain valid and that you wish the Inspector to consider.

Q8  If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination  Yes, I do wish to participate at the oral examination

☐
Part A, Q6

The RVBC Core Strategy Consultation Draft offered for comment was published in May 2012 (with an introduction dated April 2020) yet it does not respond to the National Planning Policy Framework (NPPF) which was published in March 2012. Indeed the Core Strategy Consultation Draft suggests that the NPPF is still, itself, the subject of consultation (Consultation Draft p9) and states that the Council "will of course have to ensure, once the NPPF is formally published that our Core Strategy does not conflict with it." (p9).

This is not satisfactory as the NPPF is extant and a draft of the key LDF document presented for consultation at this important stage could, and should, explain how it links to the key national guidance document and is consistent with it. In particular the Core Strategy Consultation Draft should provide an explanation of how it will follow the approach of a 'presumption in favour of sustainable development' - the "golden thread running through both plan - making and decision-taking". (NPPF p4).

Part A, Q7

The RVBC Core Strategy should be amended where appropriate to have regard to the NPPF, in particular to explain how it will follow the approach of a 'presumption in favour of sustainable development'.
Q9  If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Please note that the Inspector will determine who participates.) Please continue on a separate sheet if required.

Q10  If you wish to be kept informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the box(es) below.

- Submission of the Core Strategy to the Secretary of State for independent Examination
- The publication of the Inspector's report following the Examination
- The formal adoption of the Core Strategy

Q11  If you have any other comments to make on the Core Strategy that have not been covered elsewhere, please use the box below. Please continue on a separate sheet if required.

Q12  Date of completion

[13/04/12]

Q13  Signature

Thank you very much for taking the time to complete this comments form, your comments are very much appreciated.

If after reading the Guidance Notes you should have any queries in completing this form please telephone 01200 425111
Please use a separate form for each individual comment.

Q2  Name / Name of Organisation (if you are responding on behalf of an organisation)

Q3  To which part of the Core Strategy does this comment relate?
Part of document eg Key statement reference, 'Vision' section etc...
Paragraph No.

Q4  As a consequence do you consider the Core Strategy is:

   i) Legally compliant  Yes  No
   ii) Sound  

* The considerations in relation to the Core Strategy being sound are explained in the Guidance Notes

Q5  If you consider the Core Strategy is unsound, is this because it is not... (please tick the appropriate box)
   Justified
   Effective  Consistent with national policy

Q6  Please give details of why you consider that the Core Strategy is not legally compliant or sound. Please be as precise as possible.

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   PLEASE SEE ATTACHED SHEET
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the Core Strategy legally compliant or ward your suggested revised wording sible. Please continue on a separate

 SHEET

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Yes, I do wish to participate at the al examination
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Please see attached sheet

Please note: your comment should cover succinctly all the information, evidence, and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be another opportunity to make further comments based on the original comment made at the publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination in the forthcoming Examination in Public. Please note also that the Inspector is not obliged to consider any previous comments that have been made in respect of the Core Strategy. You are urged, therefore, to re-submit on this form any previously submitted comments that, in your view, remain valid and that you wish the Inspector to consider.

Q8 If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?
   No, I do not wish to participate at the oral examination  □   Yes, I do wish to participate at the oral examination  □
Part A, Q6

Key Statement DS1 on p38 of the Core Strategy Consultation Draft sets out the borough’s policy in relation to housing provision but appears to mix the requirement to identify sites to meet a defined minimum level of housing development with policies that will restrict sustainable development elsewhere. For example the policy in relation to housing development in smaller settlements (3rd paragraph of Key Statement DS1) will prevent sustainable development unless it also meets additional criteria: ‘recognised regeneration benefits, is for identified local needs or satisfies neighbourhood planning legislation’. This proposed policy is more restrictive than the current Local Plan policy in relation to housing development within smaller settlements (Local Plan policy G4) and will have the effect of preventing certain small scale sustainable developments for no obvious wider planning benefit. This is contrary to the NPPF presumption in favour of sustainable development and also to the wider NPPF themes, of supporting housing delivery and encouraging economic activity.

Part A, Q7

The RVBC Core Strategy should be amended to have regard to the NPPF and, in relation to DS1, it should explain the development strategy response to the NPPF’s ‘presumption in favour of sustainable development’.

DS1 should be re-written so that permission for otherwise acceptable sustainable development within all of the borough’s settlements is not constrained by compliance with other criteria. i.e. if the development is within a settlement boundary and is sustainable, an appropriate use, acceptable in amenity, environmental and other general planning terms then it should be approved.
Q9 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Please note that the Inspector will determine who participates.) Please continue on a separate sheet if required.

Q10 If you wish to be kept informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the box(es) below.

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Q12 Date of completion

[ ] 1/3 [ ] 9/6 [ ] 11/2

Q13 Signature

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