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From: [Redacted]
Sent: 30 May 2012 17:48
To: Core19
Subject: Core Strategy Publication
Our Ref.: RF/4270

Core Strategy Publication

Thank you for your letter of 3 May consulting The Theatres Trust on the publication of the Core Strategy. We note from your website that you have already adopted the Clitheroe Town Centre Masterplan despite our requests to be consulted on this document!

We are unable to complete the pdf response form as a Word version has not been supplied.

Q3 Our comments relate to the whole document which has not addressed the issue of social and cultural wellbeing as identified on page 2 of the National Planning Policy Framework.

Q4 Legally Compliant - Yes – Sound - No

Q5 Unsound because the document is not justified, effective nor consistent with the NPPF.

Q6
- The CS should give a clear message about the ways in which the area will change by its end date. It must be very clearly focussed on the locality and how it will change, giving specific local examples. It does not do this. There are few specifics as to the scale of development, the range and mix of uses, how they relate to each other and the infrastructure necessary to achieve this.
- It is also unsound because item 7 on page 2 of the published National Planning Policy Framework states that there are three dimensions to support economic development, one being a social role to support communities’ health, social and cultural well-being.
- None of the policies are robust enough to provide protection and enhancement for existing social, community and cultural facilities and services in the towns and villages. Key Statement EC2 is inadequate as there is no explanation either in the accompanying text or on the Glossary to define the term ‘community facilities’. We suggest for clarity - community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. At least with this description there would be a link to the NPPF.
- The document mentions the Clitheroe Town Centre Masterplan on page 28 but the Core Strategy should contain a policy to specifically address this matter and reflect the details of the Masterplan.
- Item 7.6 on page 61 has the word ‘leisure’ in its title, and the last two words of the 3rd bullet point in the background to the Strategic Spatial Policies on page 37 are ‘and relax’. There are no policies giving guidance for infrastructure regarding leisure activities.
- Key Statement DMR1 provides much guidance for shops but none for other town centre uses as recommended by item 23 on page 7 of the NPPF, regarding the vitality of town centres, which states that a range of suitable sites should be allocated to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that need for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites.

Q7 We find the whole document to be insubstantial, especially as it also contains Development Management Policies, and with no provision for adequate guidance to support
existing infrastructure and specific targets for new developments.

Q8 We do not wish to participate in the examination.

Q10 Please advise when the Core Strategy is Submitted, when the Inspector’s Report is published and when the Core Strategy is adopted.

Q11 Any other comments:
- Explanations for the redundant PPSs should be removed from the Glossary.
- In Key Statement DMR1 we take issue with your statement on page 99 that the inclusion of building societies and estate agents between shops can threaten the vitality of the town. People need to visit their building societies and banks, even estate agents, and these are much better placed within easy reach in main shopping areas than outside.

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We are also a consultee on Neighbourhood Development Orders and Community Right to Build Orders, and encourage local authorities, parish councils and local groups to consult the Trust on Local and Neighbourhood Development Plans.

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12/06/2012