Part B

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?
   Policy EN4 Biodiversity and Geodiversity
   Part of document eg Key Statement reference, 'Vision' section etc...

   Paragraph No.

Q4 As a consequence do you consider the Core Strategy is:
   Yes ❌ No ✗
   i) Legally compliant  ❌
   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)
   ☑ Consistent with national policy
   ☐ Effective
   ☐ Justified

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.

stated in our previous comments on the document "Making New Plans for Ribble Valley" we are concerned that the protection for ancient woodland proposed in the core strategy is weaker than that provided by policy ENV12 of the Ribble Valley Local Plan. This stated that "There is clearly sufficient land available for various types of development without destroying the last remaining areas of ancient woodland. This wording recognised that ancient woodland is an irreplaceable habitat and that once it is lost it cannot be replaced. The proposed wording in EN4 contains a welcome recognition of the need to avoid fragmentation of habitats and lists ancient woodland as a habitat to be protected and enhanced but the first sentence says it will be protected "wherever possible". The second paragraph talks about adverse effects being "mitigated or compensated for" and states that there should be no net loss of biodiversity. We do not believe that this wording gives adequate protection in that it does not recognise the irreplaceable nature of habitats such as ancient woodland which have developed over many hundreds or even thousands of years; with complex ecosystems which are not capable of replication; for example; by new woodland planting. We also do not believe that the policy is compliant with the National Planning Policy Framework or the Natural Environment White Paper in which the relevant wordings are: · The Government’s Natural Environment White Paper – The Natural Choice: securing the value of nature (HM Government: July 2011;para 2.56) states that: ‘The Government is committed to providing appropriate protection to ancient woodlands,...’ · The National Policy Planning Framework clearly states: ‘...planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats; including ancient woodland and the loss of aged or veteran trees found outside ancient woodland,...'
Q7 Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test(s) 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 as precise as possible.

I have explained this in the previous section. The change which we are looking for is absolute protection for ancient woodland and other irreplaceable semi natural habitats or at least a replication of the wording in the 1998 local plan.

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

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.)
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

If you have any other comments to make on the Core Strategy that have not been covered elsewhere, please use the box below.

We are also disappointed that there is no reference to woodland creation in the Core Strategy. Woodland provides a wide range of social, economic and environmental benefits for local communities and for this reason; we believe it is important that residents in both rural and urban areas have good access to woodland as part of a well planned and integrated network of green infrastructure. We would like to see the Council adopt woodland creation targets or to adopt an access standard such as the Woodland Trust's Access to Woodland Standard; details of which we have set out in our submissions at earlier stages in the core strategy consultation process and at a meeting with council policy planning officers.

Date of completion

15/06/12

Thank you very much for taking the time to complete this comments form, your comments are very much appreciated. Please click the submit button below to send us your comments.