Ribble Valley
Local Development Framework

Ribble Valley Core Strategy
Regulation 19 Comments Form

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

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**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.
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?
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 □
   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.

See Attached
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

[Check box] 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.) Please continue on a separate sheet if required.

TO ENSURE THAT THE ISSUE IS ADEQUATELY HEARD AND REPRESENTED

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.

SEE ATTACHED

Q12 Date of completion 06.06.2012

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
Ribble Valley Borough Council; Core Strategy
Regulation 19 Comments
Representations Submitted by

This submission should be read in conjunction with the completed Part A and Part B forms.

Paragraph 4.11
The proposed strategic pattern of housing distribution is detailed in the table. We are supportive of the proposed distribution. However, given that the only proposed allocation is at Standen and that settlement boundaries are drawn tight to the built up areas of all settlements, we are concerned about deliverability. The Core Strategy (CS) should provide an immediate and clear steer as to how decisions on planning applications would be made, ie give greater certainty to developers. The lack of such a 'clear steer' is evident from some of our further submissions.

Paragraph 6.2 / Strategic Spatial Policy H1: Housing Provision
We note the reference in the last paragraph of the policy to a formal review of the housing requirement within five years. We object to such 'short-termism'. We consider that the Cs should plan for the long-term. Indeed, NPPF paragraph 157 expects Local Plans ‘to be drawn up over an appropriate time scale, preferably a 15-year time horizon’. To build in an early review is unjustified, inappropriate, not in accord with national policy and would cerate uncertainty for communities, developers, those deciding planning applications and those involved in the phasing and delivery of necessary infrastructure.

Paragraph 6.5 / Strategic Spatial Policy H3: Affordable Housing
Paragraph 10.18 / Development Management Policy DMH1: Affordable Housing Criteria
The policies expect housing for the elderly to be provided as part of all housing developments. Such provision is not justified, nor is it practicable in all cases. The reasons for provision being impracticable will vary, but include site characteristics and site context. More particularly, such provision is impractical within small developments. The Council has previously acknowledged this to be the case. For
instance, within the ‘Addressing Housing Needs in Ribble Valley’ policy document (only adopted by the Council in January 2012) expected (paragraph 5.1) that delivery of elderly persons’ housing within developments of 30 units or more. We consider that to be an appropriate threshold and should be included within the above policies.

**Development Management Policies - General**

We note the inclusion of a wide range of Development Management policies, intended (along with the Strategic Spatial Policies) to replace all of the saved Local Plan policies. We acknowledge the need for a range of such policies. However, all such policies should be positively prepared, justified, effective and consistent with national policy (NPPF paragraph 182 refers).

The Development Management policies are simply listed within the CS. No justification for the polices is provided, nor is it demonstrated how the polices would be effective in implementation or consistent with national policy. In addition, many of the Development Management policies are expressed in the negative and do not reflect the NPPF expectation of ‘positive preparation’ and the in principle support for sustainable development. There is also considerable imprecision in the drafting of the polices, eg to consider various ill-defined factors where possible. This level of imprecision fails to provide clear guidance to communities, developers and those deciding planning applications.

Finally, the inter-relationship of the policies with the Proposals Map is entirely unclear (see later references in this regard).

We consider there to be a need to wholly overhaul the drafting of this section of the CS to address the above issues.

**Paragraph 10.20 / Development Management Policy DMH3: Dwellings in the Open Countryside**

The final paragraph categorically states that all applications for removal of holiday let conditions will be refused. Such a negative stance is entirely inappropriate, is not justified and does not accord with the NPPF. Rather, the policy should set out clear criteria against which such planning applications would be considered. This
would allow an appropriate assessment of the relative benefits / dis-benefits of the proposal to take place.

Paragraph 10.21 / Development Management Policy DMH4: The Conversion of Barns and Other Buildings to Dwellings
We note that the policy presumes against the conversion of buildings deemed to be isolated in the landscape. We submit that such an approach is not justified or reasonable. We also note that no such presumption applies in relation to policy DMB2 relating to the conversion of buildings to employment uses. There is, thus, an inconsistent and unjustified differential in the approach to conversions based on the end use. We consider that policy on the conversion of buildings to dwellings should be based on criteria that relate to discernible impacts. It may be that conversion of some buildings isolated in the landscape may unacceptable because of landscape impacts. However, that need not be the case in all instances and a judgement should be made on the merits of each case.

It should also be noted that as drafted the policy refers to the conversion of all buildings to dwellings, wherever located (eg within settlements). We would suggest that was not the intention and should be clarified.

Resultant Changes to the Proposals Map
The intentions for the Proposals Map (PM) are entirely unclear and ambiguous

In the first instance, it should be noted that all saved polices of the adopted Local Plan will be replaced by policies of the CS. That is, the Local Plan as it stands will cease to exist apart from the PM. Accordingly, none of the designations on the PM would have corresponding Local Plan policies. The Council detail a few policy designations on the PM that would not be replaced (Table 1) and a few policy designations relating to polices not saved (Table 2). Apart from the allocation of the Standen strategic site, no other changes appear to be proposed to the PM designations.

The Council go on to indicate that there would be changes to keys and policy references on the PM. However, these are not specified. We consider that any
changes must be detailed; otherwise, it is not possible for interested parties to understand what is intended nor to make any informed comment / representation.

The Council also indicate that some changes may be undertaken at a later stage through a DPD. This only adds to the uncertainty and ambiguity.

We note that some policies specifically refer to settlement boundaries and designations such as 'Open Countryside' (eg polices H3, DMG2, DMH3, DMH4, and DMB2). In such instances, the decision on any planning application would depend upon its designation on the PM. With regards to the delivery of housing, the Council has previously acknowledged that extensive areas of greenfield land outside of settlement areas would have to be developed to accommodate housing needs. The only change to the PM settlement boundaries is at Standen. Accordingly, and on the basis of the settlement boundaries as drawn (and presumed to remain for the time being), there would be a general presumption against housing development on the outer edge of the main settlements Clitheroe (excepting Standen), Longridge and Whalley and all other settlements to which that table at paragraph 4.11 correctly distributes substantial housing numbers.

Such an arrangement is at best confusing and uncertain and at worst would form a severe impediment to much needed development being delivered with consequent inconsistent decision-making.

May 2012