Ribble Valley Borough Council
Forward Planning Section
Attn Joanne Macholc
Council Offices
Church Walk
Clitheroe
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11th June 2012

Dear Joanne

Ribble Valley Core Strategy: Publication Version


The NPPF seeks to deliver sustainable development and describes the three dimensions to sustainable development with economic, social and environmental gains to be sought jointly and simultaneously with the planning system playing an active role in guiding development to sustainable solutions. In addition it explains that pursuing sustainable development involves seeking positive improvements in the quality of the historic environment. The historic environment is defined broadly to include all aspects of the environment resulting from the interaction between people and places through time.

The policies in the Local Plan must guide how the presumption in favour of sustainable development is to be applied in Ribble Valley and how the conservation and enhancement of the historic environment is integrated with this.

The NPPF sets out 12 core planning principles to under-pin plan making all of which can be related to a greater or lesser extent to the historic environment. Principally heritage assets should be conserved, the character of places recognised and enhanced, high quality design secured, cultural well-being and facilities delivered and reuse and conversion of existing buildings encouraged.
The Local Plan needs to set out a positive vision for the future of the borough and more specifically it should set out a positive strategy for the conservation and enjoyment of its historic environment.

The spatial portrait for Ribble Valley underlines the importance of its high quality environment and its impressive “unique built heritage” and says; “a key requirement of the Core Strategy will be that these special characteristics of the area are preserved for future generations, whilst ensuring appropriate development is facilitated”.

It is not clear in the document but it is assumed that the Key Statements are the policies. It is also important to clearly indicate which are strategic policies; again it is assumed that these are DS1 through to DMI3. The strategic site box on page 75 does not have a number, but I assume again it is a strategic policy. Section 10 is titled Development Management Policies yet includes Key Statements additionally there is no clear reasoned justification for the policies.

**DS1 and un-numbered strategic site policy (?) for Standen on page 75**

Unsound – not consistent with national policy

The Local Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF. Sustainable development constitutes all the policies in the NPPF from paragraph 18 to 219. Paragraph 126 requires local planning authorise to set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, and to recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

For the Standen site it is noted (page 76) that any development of the site “should take account of the presence of the line of the Roman Road that runs through the site, which is of archaeological and historic significance”. In addition but not mentioned in the Core Strategy, there are a number of other designated heritage assets nearby including the II* Standen Hall, The Old Bothy grade II and 1-9 and 11-15 Little Moor grade II. The setting of a heritage asset can be a key element in its significance and this would relate not only to nearby heritage assets but those further away such as Clitheroe Castle. In addition to the Roman Road itself there may also be associated settlement or burial activity. There may also be archaeological remains relating to other periods. The presence of non-designated heritage assets within and close to the site also needs to be identified. None of these matters would necessarily preclude the development of this site in principle but it is necessary for evidence on these matters to be sought to inform the allocation on the quantum, shape and form of development and any measures necessary for protection, enhancement or mitigation and for these matters to be included in and given the weight of policy.
We welcome the proposed preparation of master plans, development and design briefs but question whether the detailed work proposed in the CS to address potential visual impact issues should be deferred. It is important that an early start is made on a phased programme of archaeological investigation to inform the development of the site which it is suggested will take 20 years to complete.

EN5: Heritage Assets, page 47
Unsound – not consistent with national policy
It is assumed that this is the “strategic policy” for the historic environment. The NPPF paragraph 126 sets out what should be included in a local plan and in addition matters relating to the historic environment can be found throughout the Framework. EN5 fails to provide the positive strategy required by the NPPF. In summary it should cover:

- The conservation of heritage assets in a manner appropriate to their significance
- Seeking opportunities and having a clear strategy for enhancing the historic environment
- Heritage at risk
- Sensitive re-use of heritage assets
- Using the historic environment to inform new development proposals to retain local character and sense of place
- Approach to non-designated heritage assets, developing a local list
- Using the historic environment to encourage investment
- The role of historic town centres, markets and shopping streets
- How the large scale development at Standen impacts on the historic environment and should reflect the character and appearance of the local area
- Ensuring net gains across all three dimensions of sustainable development, including the historic environment
- Strategic policy for cultural infrastructure
- Identifying land inappropriate for development because of its historic significance

Development Management Policies
Section 10 of the document is titled development management policies yet it is not clear from the Key Statements what constitutes the policy and whether or not there is any justification include. It is not clear if this represents the totality of development management policies or what the proposed “DPMSE” might contain. Some important areas for the conservation and enhancement of the historic environment are not addressed, for example, advertisements and shop fronts.

DME4: Protecting Heritage Assets, page 87
Unsound – not consistent with national policy
The NPPF talks of “protection and enhancement” and “sustaining and enhancing the significance of heritage assets”. The historic
environment is wide ranging and heritage assets can be statutorily designated or locally identified. As the document explains the development management policies are aimed at informing decision making on planning applications. DME4 as worded lacks the clarity and comprehensiveness to achieve this. The opening sentence refers to “important heritage assets” – how are these to be defined. Heritage assets are defined in Annex 2 to the NPPF whilst paragraph 132 discusses the weight to be given different heritage assets.

In summary the policy should cover;
- the need for reference to the historic environment record, other evidence on the historic environment and use of appropriate expertise when developing proposals
- identifying areas of archaeological potential and when appropriate archaeological assessment is required
- the avoidance, minimisation and mitigation of any harmful impact on the historic environment
- measures to address the loss of heritage assets and to ensure development proceeds
- enabling development
- measures to ensure new development enhances the significance of conservation areas
- housing density considerations and where appropriate the value of gardens to character of the local area
- the considerations necessary to integrate new development into historic places
- local design review arrangements
- approach to advertisements and shop fronts in historic places
- approach to Article 4 Directions
- approach to enforcement

I appreciate the current stage of the Local Plan however I would be pleased to discuss with you in more detail the content of policies relating to the historic environment

Yours sincerely

Planner – North West

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