

BOLTON BY BOWLAND AND GISBURN FOREST NEIGHBOURHOOD PLAN

Bolton by Bowland and Gisburn Forest
Neighbourhood Plan Examination
A Report to Ribble Valley Borough Council

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Introduction

The Neighbourhood Plan

- 1 Where modifications are recommended, they are presented as bullet points and highlighted in **bold print**, with any proposed new wording in *italics*.
- 2 This Report provides the findings of the examination into the Bolton by Bowland and Gisburn Forest Neighbourhood Plan (referred to as the Neighbourhood Plan).
- 3 Neighbourhood planning provides communities with the power to establish their own policies to shape future development in and around where they live and work.

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.” (Paragraph 183, National Planning Policy Framework)
- 4 The Neighbourhood Plan was prepared by the Bolton by Bowland, Gisburn Forest and Sawley Parish Council Steering Group.
- 5 As set out on page 3 of the Basic Conditions Statement, submitted alongside the Neighbourhood Plan, Bolton by Bowland, Gisburn Forest and Sawley Parish Council is the *Qualifying Body*, ultimately responsible for the Neighbourhood Plan. This is in line with the aims and purposes of neighbourhood planning, as set out in the Localism Act (2011), the National Planning Policy Framework (2012) and Planning Practice Guidance (2014).
- 6 This Examiner's Report provides a recommendation with regards whether or not the Neighbourhood Plan should go forward to Referendum. Were it to go to Referendum and achieve more than 50% of votes in favour, then the Plan would be *made* by Ribble Valley Borough Council. The Neighbourhood Plan would then form part of the development plan for the Bolton by Bowland and Gisburn Forest Neighbourhood Area. As such, its made Policies would sit alongside those of the Ribble Valley Core Strategy (2014) and any other adopted planning policies, and would be used to help determine planning applications and guide planning decisions.

Role of the Independent Examiner

- 7 I was appointed by Ribble Valley Borough Council, with the consent of the Qualifying Body, to conduct an examination and provide this Report as an Independent Examiner. I am independent of the qualifying body and the local authority. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I possess appropriate qualifications and experience.
- 8 I am a chartered town planner and an experienced Independent Examiner of Neighbourhood Plans. I have extensive land, planning and development experience, gained across the public, private, partnership and community sectors.
- 9 As the Independent Examiner, I must make one of the following recommendations:
- that the Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements;
 - that the Neighbourhood Plan, as modified, should proceed to Referendum;
 - that the Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.
- 10 If recommending that the Neighbourhood Plan should go forward to Referendum, I must then consider whether the Referendum Area should extend beyond the Bolton by Bowland and Gisburn Forest Neighbourhood Area to which the Plan relates.

Neighbourhood Plan Period

- 11 A neighbourhood plan must specify the period during which it is to have effect. The front cover of the Neighbourhood Plan specifies that the document covers the period:

"2014 to 2028."

- 12 In addition, the Basic Conditions Statement submitted alongside the Neighbourhood Plan confirms, on page 3, that the plan period:

"...is from 2014 to 2028 (the same period as the Ribble Valley Core Strategy)."

- 13 Taking the above into account, the Neighbourhood Plan satisfies the relevant requirement in respect of specifying the plan period.

Public Hearing

- 14 According to the legislation, *when the Examiner considers it necessary* to ensure adequate examination of an issue, or to ensure that a person has a fair chance to put a case, then a public hearing must be held.
- 15 However, the legislation establishes that it is a general rule that neighbourhood plan examinations should be held without a public hearing – by written representations only.
- 16 Further to consideration of the information submitted, I confirmed to Ribble Valley Borough Council that I was satisfied that the Ribble Valley Neighbourhood Plan could be examined without the need for a Public Hearing.
- 17 In making the above decision I was mindful that the Neighbourhood Plan has emerged through robust consultation (see *Public Consultation*, later in this Report) and that people have been provided with significant and appropriate opportunities to have their say.

2. Basic Conditions and Development Plan Status

Basic Conditions

- 18 It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the “basic conditions.” These were *set out in law*¹ following the Localism Act 2011. A neighbourhood plan meets the basic conditions if:
- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - the making of the neighbourhood plan contributes to the achievement of sustainable development;
 - the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - the making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union (EU) obligations; and
 - the making of the neighbourhood plan is not likely to have a significant effect on a European site or a European offshore marine site, either alone or in combination with other plans or projects.²
 - An independent examiner must also consider whether a neighbourhood plan is compatible with the Convention rights.³
- 19 In examining the Plan, I am also required, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:
- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;

¹ Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

² Prescribed for the purposes of paragraph 8(2) (g) of Schedule 4B to the 1990 Act by Regulation 32 The Neighbourhood Planning (General) Regulations 2012 and defined in the Conservation of Habitats and Species Regulations 2010 and the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007.

³ The Convention rights has the same meaning as in the Human Rights Act 1998.

- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

20 Subject to the content of this Report, I am satisfied that these three points have been met.

21 In line with legislative requirements, a Basic Conditions Statement was submitted alongside the Neighbourhood Plan. This sets out how, in the qualifying body's opinion, the Neighbourhood Plan meets the basic conditions.

European Convention on Human Rights (ECHR) Obligations

- 22 I am satisfied that the Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998 and there is no substantive evidence to the contrary.
- 23 In the above regard, I note that Information has been submitted to demonstrate that people were provided with a range of opportunities to engage with plan-making in different places and at different times. Representations have been made to the Plan, some of which have resulted in changes and the Consultation Statement submitted alongside the Neighbourhood Plan provides a summary of responses and shows the outcome of comments.

European Union (EU) Obligations

- 24 There is no legal requirement for a neighbourhood plan to have a sustainability appraisal⁴. However, in some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a Strategic Environmental Assessment.
- 25 In this regard, national advice states:
- "Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects."*
(Planning Practice Guidance⁵)
- 26 National advice then goes on to state⁶ that the draft plan:
- "...must be assessed (screened) at an early stage of the plan's preparation..."*
- 27 This process is often referred to as a screening or scoping report. If the report identifies likely significant effects, then an environmental report must be prepared.

⁴ Paragraph 026, Ref: 11-027-20150209, Planning Practice Guidance

⁵ Paragraph 027, ibid

⁶ Planning Practice Guidance Reference ID: 11-028-20150209.

28 Further to undertaking a scoping report, which was commented upon by the statutory consultation bodies, English Nature, Historic England and the Environment Agency, Bolton by Bowland and Gisburn Forest Parish Council determined to undertake a Strategic Environmental Assessment (SEA).

29 The SEA identified a number of areas where the Neighbourhood Plan could be strengthened:

“to ensure delivery of a sustainable approach...and...produce a sustainable plan which enhances biodiversity, historic assets and landscape character.”

30 A Habitats Regulations Assessment was carried out. This identified three European sites within ten kilometres of the Neighbourhood Area. These comprise the Special Areas of Conservation (SACs) at Ingleborough Complex and at North Pennine Dales Meadows; and the Bowland Fells Special Protection Area.

31 The Habitats Regulations Assessment concluded that:

“...it is not considered that significant adverse effects...will arise. A project level HRA of any development-related strategies undertaken under the Neighbourhood Plan will be more effective at addressing potential impacts on European sites.”

32 The SEA was consulted upon in its entirety and there are no substantive objections to its findings.

33 In addition to the above, national guidance establishes that the ultimate responsibility for determining whether a draft neighbourhood plan meets EU obligations lies with the local planning authority:

“It is the responsibility of the local planning authority to ensure that all the regulations appropriate to the nature and scope of a neighbourhood plan proposal submitted to it have been met in order for the proposal to progress. The local planning authority must decide whether the draft neighbourhood plan is compatible with EU regulations” (Planning Practice Guidance⁷).

34 Ribble Valley Borough Council has raised no objections or concerns with regards European obligations. Taking this and the above into account, I am satisfied that the Neighbourhood Plan meets the basic conditions in respect of meeting European obligations.

⁷ Planning Practice Guidance Reference ID: 11-031-20150209,

3. Background Documents and the Bolton by Bowland and Gisburn Forest Neighbourhood Area

Background Documents

35 In undertaking this examination, I have considered various information in addition to the Bolton by Bowland and Gisburn Forest Neighbourhood Plan. This has included (but is not limited to) the following main documents:

- National Planning Policy Framework (the Framework) (2012)
- Planning Practice Guidance (2014)
- Town and Country Planning Act 1990 (as amended)
- The Localism Act (2011)
- The Neighbourhood Plan Regulations (2012) (as amended)
- Ribble Valley Core Strategy 2008-2028 (2014)
- Basic Conditions Statement
- Consultation Statement
- Strategic Environmental Assessment
- Statement of Environmental Particulars
- Bolton by Bowland, Gisburn Forest and Sawley Housing Needs Survey

Also:

- Representations received

36 In addition, I spent an unaccompanied day visiting the Bolton by Bowland and Gisburn Forest Neighbourhood Area.

Bolton by Bowland and Gisburn Forest Neighbourhood Area

- 37 Bolton by Bowland and Gisburn Forest Neighbourhood Area covers the individual parishes of Bolton by Bowland and Gisburn Forest. Whilst the parish of Sawley is administered by Bolton by Bowland, Gisburn Forest and Sawley Parish Council, Sawley parish was not included in the Neighbourhood Area. This followed a vote at a public meeting in Sawley in January 2013, when the majority of voters determined against the inclusion of Sawley.
- 38 The plan provided on page 4 of the Neighbourhood Plan confirms the location of the Neighbourhood Area and its boundary.
- 39 Ribble Valley Borough Council approved the designation of Bolton by Bowland and Gisburn Forest as a Neighbourhood Area in May 2014. This satisfied a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

4. Public Consultation

Introduction

- 40 As land use plans, the policies of neighbourhood plans form part of the basis for planning and development control decisions. Legislation requires the production of neighbourhood plans to be supported by public consultation.
- 41 Successful public consultation enables a neighbourhood plan to reflect the needs, views and priorities of the local community. It can create a sense of public ownership, help achieve consensus and provide the foundations for a 'Yes' vote at Referendum.

Bolton by Bowland and Gisburn Forest Neighbourhood Plan Consultation

- 42 A Consultation Statement was submitted to Ribble Valley Borough Council alongside the Neighbourhood Plan. The information within it sets out who was consulted and how, together with the outcome of the consultation, as required by the neighbourhood planning *regulations*⁸.
- 43 Following the decision to produce a Neighbourhood Plan to cover Bolton by Bowland and Gisburn Forest, four workshops were held, with the aim of identifying the issues that the Neighbourhood Plan should address. Following these workshops, in July 2014, a newsletter was produced and delivered to households. This set out the progress made and identified a timetable for plan production.
- 44 A consultation event, attended by 63 people, was held to consider the allocation of land for housing. The Consultation Statement sets out that two sites were initially "*identified*" for housing and that a third site was included following "*further work*" with the landowner.

⁸Neighbourhood Planning (General) Regulations 2012.

- 45 A plan was then completed and underwent a six week consultation period during January-March 2015. The consultation period was supported by a flyer to all households and businesses, and display of the flyer on three Parish Council notice boards. Hard copies of the relevant documents were made available in various locations.
- 46 Taking the above into account, the Neighbourhood Plan was supported by consultation that met the statutory requirements.
- 47 The Neighbourhood Plan seeks to allocate land for development. The allocation of development land can be a matter of major contention. Taking into account representations received during the Submission Consultation period, it is apparent that, with specific regard to the proposed allocation of development land at Tosside, there are members of the local community who consider public consultation to have been insufficient.
- 48 Paragraph 183 of the Framework affords communities direct power to develop a "*shared vision*." Given the above, there is concern that the proposed land allocation at Tosside is not the result of a shared vision. I consider land allocations in more detail later in this Report.

5. The Neighbourhood Plan – Introductory Section

49 The introduction to the Neighbourhood Plan and the historical context that follows, provides a clear and distinctive opening to the document.

50 Whilst it may have been useful during earlier drafts of the Neighbourhood Plan, the background information set out on page 11 has largely been overtaken by events and I recommend:

- **Delete page 11**

51 The wording of legislation relating to neighbourhood planning is precise and paraphrasing runs the risk of misinterpretation. Taking this into account and for clarity, I recommend:

- **Page 12, Para 3.1, change to “...Plan must *have regard to* national planning policy.”**
- **Para 3.3, change to “...been prepared “in general conformity” with the *strategic* policies in the...”**

6. The Neighbourhood Plan – Neighbourhood Plan Policies

Housing

Policy BBGF1 – Scale and Type of New Development

- 52 The Neighbourhood Plan should not promote less development than set out in the Ribble Valley Core Strategy (Core Strategy), nor undermine that document's strategic policies, having regard to Paragraph 185 of the National Planning Policy Framework (the Framework).
- 53 Bolton by Bowland and Tosside are defined in the Core Strategy as *"Tier 2" settlements, "which are the less sustainable of the (Borough's) 32 defined settlements."*
- 54 Core Strategy Key Statement DS1 (*"Development Strategy"*) requires development in Tier 2 settlements to meet proven local needs, deliver regeneration benefits or satisfy neighbourhood planning legislation. It provides for *"small-scale development in the smaller settlements that are appropriate for consolidation and expansion or rounding-off of the built-up area."*
- 55 Further, Key Statement DS1 requires development to have regard to the AONB and *"to reflect existing population size, the availability of, or the opportunity to provide facilities to serve the development and the extent to which development can be accommodated within the local area."*
- 56 The first two Criteria of Policy BBGF1 seek to allocate land for the development of 8 dwellings at Bolton by Bowland and 12 dwellings at Tosside. Whilst there is no Core Strategy requirement for the allocation of residential development sites in Tier 2 settlements, the Neighbourhood Plan seeks to do so to *"increase the sustainability"* of the settlement of Bolton by Bowland and to *"try to retain the services that are presently available within the village."* To do this, the Neighbourhood Plan states that *"it is essential to retain younger residents in the area by providing suitable housing."*

- 57 In addition, the Neighbourhood Plan states that a site in Tosside *"has been identified which could be used to satisfy local housing needs."* It goes on to state that, *"with the appropriate mix of affordable and open market homes"* the site *"could regenerate the village."*
- 58 Consequently, Policy BBGF1 identifies residential development sites in Bolton by Bowland and Tosside. Whilst Criterion a) refers to *"the preferred site,"* the relevant plan (Map 1) identifies two development sites to the east of Bolton by Bowland. The final part of the Policy provides for one of these sites, the site to the south of the road, to provide for development *"should there be a problem"* with the other site. These sites provide for *"up to a maximum"* of 8 dwellings.
- 59 Criterion b) refers to a site in Tosside on land close to the Listed church. This site provides *"for up to 12 dwellings"* at a density *"consistent with the context of the surrounding area."*
- 60 The above approach raises a number of concerns when considered against the basic conditions.
- 61 Planning Practice Guidance⁹ states that:
- 62 *"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."*
- 63 In respect of the Bolton by Bowland allocations, no evidence is provided to demonstrate that they will provide suitable housing to retain younger residents. The allocations are simply for up to 8 dwellings. The Policy contains no precise specification of housing types or tenures.
- 64 Also, no substantive evidence is provided to demonstrate that the provision of up to 8 dwellings will *"retain the services that are presently available within the village,"* as per the stated objective of the Policy. Whilst it could reasonably be anticipated that new residents might use existing services, there is nothing to show what these existing services are and how the provision of 8 dwellings would impact on their retention or otherwise.

⁹ Paragraph: 042 Reference ID: 41-042-20140306

- 65 Similarly, there is no evidence to demonstrate that the allocations in Bolton by Bowland will *"increase the sustainability of the settlement."*
- 66 During my site visit, I observed that both sites are located within the immediate setting of Bolton by Bowland Conservation Area, as well as within that of a Listed Building defined as a focal building in the Bolton by Bowland Conservation Area Appraisal. Both sites are in the open countryside within the AONB.
- 67 Whilst the very brief *"Site Assessments"* report in Appendix E states that *"siting and design could mitigate any impact,"* there is an absence of information to demonstrate that this is the case.
- 68 Taking the above into account, the Neighbourhood Plan seeks to allocate residential development land in the countryside, within the AONB and within the immediate setting of a Conservation Area and a Listed Building, without any substantive evidence to demonstrate that the land could be developed without harm to these nationally significant assets.
- 69 In addition to the above, it is not clear why land is allocated for *"up to a maximum of 8 dwellings."* There is an absence of evidence to demonstrate that there is a requirement for 8 dwellings of any type or tenure in Bolton by Bowland or that the land allocated can most appropriately be developed by providing for a maximum of 8 dwellings. Equally, there is nothing to demonstrate how the provision of 8 dwellings might add to the sustainability of the settlement. This suggests that the allocation of a maximum of 8 dwellings is something of an arbitrary figure and it exacerbates the concerns highlighted above.
- 70 The supporting text to Policy BBGF1 refers to a Housing Needs Survey undertaken in 2014. This Housing Needs Survey states that Tosside is *"very remote and isolated from services."* Given this, the Housing Needs Survey, which it is suggested supports the allocations, appears to identify Tosside as an unsustainable location. During my site visit I observed that Tosside, whilst attractively rural, is an isolated hamlet with very few services or facilities. As such, it appears to be an isolated and potentially unsustainable location for the allocation of land for up to 12 new dwellings. There is no substantive evidence to the contrary.

- 71 Given this, to enable it to contribute to the achievement of sustainable development, it would seem important for a residential land allocation in Tosside to meet a specific objective or purpose. In this respect, the Neighbourhood Plan suggests that the allocation could satisfy local housing needs, through a mix of open market and affordable housing, and regenerate the village.
- 72 However, no specific local housing need linked to Policy BBFG1, which does not, in any case, provide for a mix of open market and affordable housing, has been identified. I am also mindful that no substantive evidence has been provided to demonstrate that the allocation in Tosside will “regenerate” the village, as per one of its stated objectives.
- 73 Further to the above, it is unclear why land is allocated for up to 12 dwellings in Tosside. This figure does not reflect any specific, identified need for the settlement and like that for Bolton by Bowland, it appears as an arbitrary figure. This is a concern as the allocation comprises a site in the open countryside, within the AONB and in the immediate setting of a Grade 2 Listed church.
- 74 Furthermore, whilst Appendix E states that “*full account of heritage assets has been undertaken,*” it fails to include any assessment of the land allocation at Tosside. There is no evidence to demonstrate that up to 12 dwellings can be developed without undue harm to the setting of a designated heritage asset.
- 75 During my site visit, I observed the proposed allocation at Tosside to comprise a prominent field, visible from many surrounding aspects. Consequently, it appeared to me that any development would inevitably impact on the appearance and character of the AONB. There is no substantive evidence to demonstrate that such development could enhance the AONB or even be achieved without harm to it.
- 76 In addition to all of the above, Appendix E refers to the allocated sites as having emerged through “*a robust selection and appraisal process.*” The appraisal process largely amounted to the Steering Group choosing three sites identified in the Ribbles Valley SHLAA Update 2013. One of these was found to flood. The other two sites were then included in the Neighbourhood Plan. There is little, if any, evidence to demonstrate that the allocated sites emerged through a robust selection and appraisal process.

- 77 Taking all of the above into account, I am mindful of the potentially harmful impact of the allocations in the Neighbourhood Plan on designated heritage assets and to the AONB. Without clear evidence, it is difficult to draw the clear conclusion that the proposed allocations are not contrary to the requirements of national and local planning policy – which affords considerable protection to such assets.
- 78 Furthermore, there is no substantive evidence to demonstrate that the allocations will result in development that will bring benefits so significant that they would mitigate against, or outweigh any potential for harm.
- 79 Consequently, it is my consideration that the allocations fail to contribute to the achievement of sustainable development and that they do not meet the basic conditions.
- 80 In addition to the above, the first paragraph of Policy BBGF1 could be taken to imply that the settlement boundaries for Bolton by Bowland, Tosside and Holden are defined by the Neighbourhood Plan. This is not the case. The settlement boundaries are defined by the Core Strategy. To avoid confusion, this should be made clear (and the boundaries checked to ensure that they are the same as those carried forward by the Core Strategy). I refer to this in the recommendations below.
- 81 I recommend:
- **Policy BBGF1, change opening paragraph to *“New small scale housing development within the settlement boundaries of Bolton by Bowland, Tosside and Holden will be supported where:”***
 - **Delete Criteria a) and b)**
 - **Change Criterion d) to *“It provides safe and secure access; and”***
 - **Add *“It”* to the beginning of Criteria e) and f)**
 - **Delete Criterion g) (see comments on Policy BBGF2 below, in respect of cross-referencing)**
 - **Delete last two paragraphs (*“Development in Bolton by...surrounding area.”*)**

Policy BBGF2 – Housing in Existing Hamlets and Farmsteads

- 82 National policy allows for the re-use of redundant or disused buildings in the countryside where this would lead to an enhancement of the immediate setting (Paragraph 55, the Framework). It also provides for the development of new dwellings of exceptional quality or innovation, subject to stringent criteria; and for development essential for the purposes of agriculture.
- 83 Core Strategy Key Statement EN2 ("*Landscape*") requires all development to contribute to the natural beauty of the Forest of Bowland Area of Outstanding Natural Beauty (AONB). In addition, Core Strategy Policies DMH3 ("*Dwellings in the Open Countryside and AONB*") and DMH4 ("*The Conversion of Barns and Other Buildings to Dwellings*") provide for the conversion of buildings in the countryside to dwellings.
- 84 Generally, Policy BBGF2 seeks to provide for the conversion of rural buildings to dwellings and as such, it has regard to national policy and is in general conformity with the strategic policies of the development plan. However, the Policy opens with a general and ambiguous statement, without any indication of what is or is not "*appropriate.*" The opening paragraph then goes on to preclude forms of development that would meet the requirements of national policy, as set out in Paragraph 55, without justification.
- 85 The first part of the Policy is imprecise and consequently, it fails to have regard to national advice, as set out earlier in this Report.
- 86 The criteria in Policy BBGF2 largely repeat, or are in general conformity with Core Strategy Policies. The final criteria, h) and i) comprise a word-for-word repetition of part of Core Strategy Policy DMH3. It is not the role of the Neighbourhood Plan to simply repeat existing policy. In a similar vein, the final paragraph of Policy BBGF2 cross-references other policies in the Neighbourhood Plan and the Core Strategy. This is a cumbersome and unnecessary approach as the policies of the development plan should be considered as a whole.
- 87 I recommend:
- **Policy BBGF2, delete first two sentences and replace with "*The conversion of agricultural buildings to dwellings will be supported where:*"**

- Delete “The rebuilding or replacement...new dwelling” (including Criteria h) and i)
- Change final paragraph to “*Proposals should have regard to the Historic Environment Local Management (HELM) Good Practice Guide on the Conversion of Traditional Farm Buildings.*”

Design and the Built Environment

Policy BBGF3 – Protecting Heritage Assets

- 88 National policy recognises that heritage assets are irreplaceable. Chapter 12 of the Framework, *“Conserving and Enhancing the Historic Environment,”* requires heritage assets to be conserved in a manner appropriate to their significance and establishes that it is desirable to enhance heritage assets and put them to uses consistent with their conservation.
- 89 Core Strategy Policy DME4 (*“Protecting Heritage Assets”*) requires the conservation and where appropriate, enhancement of Conservation Areas and their settings; and seeks to protect the significance of heritage assets, including Listed Buildings, from harm.
- 90 To some extent, Policy BBGF3 has regard to national policy and is in general conformity with Core Strategy Policy DME4, in that it aims to conserve and protect heritage assets. As set out, however, the requirements of Policy BBGF3 are significantly more onerous than national policy.
- 91 No evidence is provided to demonstrate that it would be necessary, or even possible, for all development within the Bolton by Bowland Conservation Area, or its setting, to enhance its positive attributes¹⁰. Such an approach fails to have regard to Paragraph 173 of the Framework, which establishes that:

“Plans should be deliverable. Therefore, the...scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”

¹⁰ In considering the above, I have considered Core Strategy Policy DMG1 Criteria “Environment 3” which states that *“All development must protect and enhance heritage assets and their settings.”* This Policy is in conflict with national policy (including Chapter 12 and Paragraph 173 of the Framework) and there is no evidence to demonstrate that all development can achieve the requirements set out.

- 92 In accordance with the national presumption in favour of sustainable development, Chapter 12 of the Framework establishes a clear and carefully worded approach to provide for the balanced consideration of development proposals affecting heritage assets. This enables benefits to be weighed against any harm arising. However, the second paragraph of Policy BBGF3 would serve to simply prevent development that results in any detrimental impact to heritage assets, regardless of the significance of such harm, or of any benefits that might arise as a result of development. This part of the Policy does not have regard to the Framework.
- 93 Much of the criteria listed in Policy BBGF3 would not be relevant to every form of development proposal. Consequently, “*expecting*” all development to achieve the requirements set out is unrealistic and fails to have regard to Paragraph 173 of the Framework. The prescriptive requirements of Criteria a) and d) (in respect of building lines and street frontage; and the proportion of wall to openings and detailing) provide examples of this and furthermore, are not justified by the provision of detailed evidence. In any case, matters relating to these Criteria would largely be covered by less prescriptive requirements set out elsewhere in the Policy.
- 94 The final paragraph of the Policy comprises a vague statement and does not provide for precision or clarity. The Policy fails to identify the assets referred to and does not provide any indication of how “*a presumption in favour of retention*” might work in practice. This part of the Policy does not provide a decision maker with a clear indication of how to react to a development proposal having regard to Paragraph 154 of the Framework.
- 95 The penultimate paragraph of the supporting text to Policy BBGF3 reads as though it comprises a Policy, which it does not.
- 96 Taking the above into account, I recommend:
- **Policy BBGF3, delete first and second sentences**
 - **Replace third sentence with “*Development should conserve and where possible, enhance the Bolton by Bowland Conservation Area. Development should:*”**

- **Delete Criteria a) and d)**
- **Delete final sentence (“There will be...Area.”)**
- **For consistency, use capitals as in “Conservation Area” throughout the Policy (and the Neighbourhood Plan)**
- **Delete Paragraph 5.2.9**

Policy BBGF4 – General Design Principles

- 97 Good design is recognised by the Framework as comprising:
- “a key aspect of sustainable development...indivisible from good planning.”*
(Paragraph 56)
- 98 Also, national policy requires good design to contribute positively to making places better for people (Chapter 7, The Framework). Paragraph 58 of the Framework goes on to require development to:
- “...respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation...”*
- 99 In addition to the above, Core Strategy Policy DMG1 (“*General Considerations*”) promotes a high standard of design.
- 100 Policy BBGF4 seeks to set out a long list of Criteria ultimately aimed at encouraging good design and in this way, its overall intent might be considered to have regard to national policy and be in general conformity with Core Strategy Policy DMG1. However, as set out, the Policy is unduly prescriptive and imposes requirements for “*all new development*” without supporting evidence to demonstrate that it would be viable, deliverable or even possible for all development to comply with. As a consequence, the Policy appears to be in direct conflict with Paragraph 173 of the Framework.
- 101 For example, the first Criterion places a requirement on all development to demonstrate that consideration has been given to the use of brownfield land or existing buildings. This will simply not be relevant to many forms of development and there is no evidence provided in the Neighbourhood Plan of the existence of brownfield land for development.
- 102 Also, by way of example, it is unclear why, say, a proposal for an advertisement, or the changing of windows in the Conservation Area would need to be “*capable of connection to essential infrastructure or services*” as required by Criterion b).
- 103 In addition to the above, in simple terms, the Policy effectively states that development that meets every policy in the development plan, in addition to the requirements of the Criteria set out, will be permitted. Whilst this might be a matter of fact, it provides little in the way of a useful or helpful land use planning Policy.

- 104 The use of the phrase "*will be permitted*" in the first line of the Policy runs the risk of pre-determining the planning application process. It fails to allow for all relevant considerations, such as balancing benefits against harm, to be taken into account and as a consequence, the Policy runs the risk of placing an obstacle in the way of the achievement of sustainable development.
- 105 It may be that some degree of harm could arise from a development proposal in respect of noise, local character or any number of other things. The national planning policy presumption in favour of sustainable development provides for harm to be weighed against benefits. As set out, Policy BBGF4 simply requires development not to result in any detrimental effects on noise, disturbance or local character, regardless of any benefits that might outweigh, or mitigate against, harm. The Policy does not meet the basic conditions in this regard.
- 106 Further to the above, I note that the phrase "*designated area*" is undefined. This leads the opening sentence of the Policy to be imprecise, as all kinds of designations exist.
- 107 Criterion k) is also imprecise. No indication is provided of what "*acceptable*" movement might comprise, or of who will judge this, or on what basis.
- 108 It is not clear how a development might encourage originality, innovation or initiative and no information is provided in this respect. A plan might provide policies that are worded in a way that they encourage originality or innovation, but the Neighbourhood Plan does not do so.
- 109 As set out, Policy BBGF4 is, in part, confusing and it fails to meet the basic conditions. However, taking all of the above into account, I recommend:
- **Policy BBGF4, delete first sentence and replace with "*All new development will be expected to demonstrate good design. Development that meets the following Criteria, where appropriate and viable, will be supported:*"**
 - **Delete Criteria a), k), j) and o)**

Transport/Infrastructure

Policy BBGF5 – Transport Improvements

110 Paragraph 204 of the Framework states that:

“Planning obligations should only be sought where they meet all of the following tests: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.”

111 The first part of Policy BBGF5 largely comprises a general statement, in respect of what the Parish Council will seek to do. It does not comprise a land use planning policy that has regard to Paragraph 204 of the Framework.

112 The Policy goes on to “expect” undefined “transport improvements” to enhance landscape character. There is no evidence to demonstrate that this imprecise requirement, which goes beyond those of national policy, has regard to Paragraph 173 of the Framework, in respect of viability and deliverability.

113 The final part of Policy BBGF5 relates to a non-land use planning policy matter and sets out something that the Parish Council will seek to do.

114 Taking the above into account, I recommend:

- **Delete Policy BBGF5**
- **Provide new Parish Action on page 56: “The Parish Council will seek to ensure that developer contributions and Community Infrastructure Levy payments are put towards highway improvement schemes to promote the safety of pedestrians and cycle users; traffic calming measures, pedestrian priority schemes and the reduction in traffic speeds on routes through the village centre; increasing public and community transport to and from the designated area.**

The Parish Council will seek to work with and encourage providers of public transport to provided as full as service as is needed to support future development in the village.”

Policy BBGF6 – Supporting Development of Communications Infrastructure

115 The first part of Policy BBGF6 is a positive land use planning policy that supports the provision of high quality communications infrastructure.

116 The Policy has regard to Paragraph 42 of the Framework, which recognises that:

117 *“Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.”*

118 The last sentence is unduly onerous and fails to have regard to Paragraph 173 of the Framework. There is no evidence to demonstrate that it would be viable, deliverable, or even relevant, for all development to make provision for high speed broadband.

119 I recommend:

- **Policy BBGF6, delete final sentence (“All new development...broadband.”)**

Policy BBGF7 – Footpaths/Connectivity

120 Chapter 4 of the Framework, *“Promoting sustainable transport,”* supports sustainable patterns of movement. In addition, Paragraph 75 of the Framework states:

“Planning policies should protect and enhance public rights of way and access.”

121 The first part of Policy BBGF7 supports the improvement of footpaths and linkages and has regard to national policy.

122 However, the second part of the Policy runs the risk of placing an insurmountable barrier in the way of the Policy intention to enhance rights of way. It requires all proposals to provide enhanced access and signage, new footpaths and cycle routes to both existing and new networks, linkages to wildlife corridors and *“actions”* to promote biodiversity conservation. Together, this sets out a long and onerous wish-list and there is no evidence, or information, to demonstrate that the requirements of the Policy are viable or deliverable. As such, the second part of the Policy may prevent the achievement of sustainable development.

123 Taking all of the above into account, I recommend:

- **Policy BBGF7, delete third sentence and replace with *“Provision of the following, to maximise accessibility and support local biodiversity, will be supported:”***

Employment

Policy BBGF8 – Supporting Existing Local Employment

- 124 Chapter 3 of the Framework supports economic growth in rural areas to create jobs and prosperity. Further, Core Strategy Policy DMB1 (*“Supporting Business Growth and the Local Economy”*) seeks to protect employment sites, whilst providing flexibility for appropriate changes of use.
- 125 In general terms, Policy BBGF8, in seeking to afford protection to employment sites, seeks to provide some flexibility to allow for changes of use where such sites are no longer viable. In this way, the Policy meets the basic conditions.
- 126 As set out, Policy BBGF8 refers to undefined *“sources of employment.”* No indication is provided of what these might comprise – an entrepreneur, a bank, raw materials ? - and consequently this part of the Policy is imprecise.
- 127 The use of the phrase *“will only be permitted”* in the second sentence of the Policy runs the risk of pre-determining the planning application process. It fails to allow for all relevant considerations, such as balancing benefits against harm, to be taken into account and as a consequence, the Policy places an obstacle in the way of the achievement of sustainable development.
- 128 The second Criterion in the Policy comprises an unnecessary cross-reference.
- 129 I recommend:
- **Policy BBGF8, delete first sentence**
 - **Change second sentence to *“...will be supported when the employment premises have...employment use.”***
 - **Delete Criterion b)**

Policy BBGF9 – New Local Employment Opportunities

- 130 Having regard to Chapter 3 of the Framework, referred to earlier in this Report, Policy BBGF9 generally promotes economic growth.
- 131 However, it is not clear what “*a new local employment opportunity*” might be and why this is necessarily related to development. The Policy and its title is imprecise in this regard. As with previous Policies, Policy BBGF9 also runs the risk of pre-determining the planning application process and consequently, places a hurdle in the way of the achievement of sustainable development, through use of the phrase “*will be permitted.*”
- 132 The various Criteria set out in Policy BBGF9 are imprecise. Neither “*open space*” nor “*green infrastructure*” are defined and consequently, it is not clear when development might lead to the loss of these things. In general terms, development where none currently exists will inevitably result in the loss of open space.
- 133 The Policy does not provide for the balanced consideration of development proposals, such that harm can be weighed against benefits. It could be, for example that some, minor harm to residential amenity is outweighed by a significant community benefit, resulting in the achievement of sustainable development. The Policy fails to provide for this and does not meet the basic conditions.
- 134 No indication of what “*an unacceptable impact on traffic*” might be is provided and it is not clear what “*close to existing highways*” means – 1 metre away, 100 metres away ? The Policy is imprecise in these respects.
- 135 I recommend:
- **Policy BBGF9, delete and replace with “*Proposals for employment development will be supported where they respect local character, residential amenity and highway safety.*”**
 - **Change title of Policy to “*New Employment Development*”**

Policy BBGF10 – Rural Enterprise and Farm Diversification

- 136 The restrictive approach of the opening paragraph of Policy BBGF10 is in direct conflict with the preceding Policy. In addition, as set out earlier, national policy promotes the development of the rural economy, whereas the wording of Policy BBGF10 results in an approach that may serve to stifle economic development, without justification in the form of evidence to the contrary.
- 137 However, much of the Policy is concerned with supporting the controlled conversion of traditional agricultural buildings in the AONB to employment use. In general terms, this is in general conformity with Core Strategy Policy DMB2 (*"The conversion of barns and other rural buildings for employment uses"*), which supports the conversion of barns and other rural buildings for employment uses.
- 138 Taking this into account, I recommend:
- **Policy BBGF10, delete opening paragraph and replace with *"The conversion of traditional agricultural buildings for employment uses will be supported where."***
 - **Change final paragraph to *"Proposals should have regard to the Historic...Buildings."***

Policy BBGF11 – Tourism Development

139 In seeking to promote a strong rural economy, Paragraph 103 of the Framework supports:

“...sustainable tourism and leisure developments that benefits businesses in rural areas, communities and visitors, and which respect the character of the countryside...”

140 Generally, Policy BBGF11 supports tourism development and has regard to national policy.

141 As set out, the first sentence of the Policy relies upon Policies within another document not within the control of the Neighbourhood Plan and its second sentence sets out a negative approach, rather than positive policy framework that has regard to national policy.

142 The first Criterion of Policy BBGF11 requires development to be *“in a sustainable location”* but provides no indication of where this might be. This part of the Policy is imprecise and fails to provide a decision maker with a clear indication of how to react to a development proposal.

143 The third Criterion of the Policy comprises unnecessary cross-references and the final Criterion refers to undefined *“curtilage space.”* The definition of curtilage can involve complex legal issues and without providing clarity, in the form of substantive information, the Neighbourhood Plan appears imprecise in this regard.

144 I recommend:

- **Policy BBGF11, change first sentence to *“...and new visitor accommodation will be supported.”***
- **Change second sentence to *“...permanent residential use will be supported where:”***
- **Change Criterion a) to *“It forms part of an existing group of buildings;”***

- **Change Criterion b) to “*There is evidenced...*”**
- **Delete Criterion c)**
- **Change Criterion e) to “Sufficient *external* space can be provided...”**

Community Facilities

Policy BBGF12 – Protection of Local Green Spaces

145 Local communities can identify areas of green space of particular importance to them for special protection. Paragraph 76 of the Framework states that:

“By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.”

146 Consequently, Local Green Space is a restrictive and significant policy designation. The Framework requires the managing of development within Local Green Space to be consistent with policy for Green Belts. A Local Green Space designation therefore provides protection that is comparable to that for Green Belt land.

147 National policy establishes that:

“The Local Green Space designation will not be appropriate for most green areas or open space.” (Paragraph 77)

148 Thus, when identifying Local Green Space, plan-makers should demonstrate that the requirements for its designation are met in full. These requirements are that the green space is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance; and it is local in character and is not an extensive tract of land. Furthermore, identifying Local Green Space must be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.

149 Policy BBGF12 seeks to allocate six areas of Local Green Space and these are shown on Map 1. However, Map 1 is not entirely clear, such that the precise boundaries of each Local Green Space are not easily identifiable. Given the importance of the Local Green Space designation there should be no uncertainty in this respect and consequently, I make a related recommendation below.

150 The Policy text is cumbersome to the point of being unclear, in that it states that land will be protected in accordance with the Framework, but then goes on to state how land will be protected. This is a matter also addressed in the recommendations below.

151 Table 1 sets out the reasons why each allocation meets the requirements of the Framework. However, during my site visit I found Site 6, "*Parkland towards King Henry Mews*," to comprise an extensive tract of land. The Site encompasses several very large fields. It covers an area of land not hugely dissimilar in size to that of the whole of the settlement of Bolton by Bowland. It also covers an area considerably larger than that of the combined area of all five of the other areas of Local Green Space. There is no substantive evidence to demonstrate that the Site does not comprise an extensive tract of land.

152 Whilst it might be the case that a smaller area of Site 6, closer to the settlement could meet the relevant tests set out in the Framework, Policy BBGF12 does not seek to designate a smaller area – and any such reduced site has not been subject to public consultation.

153 Given the above, Site 6 does not meet the basic conditions.

154 I recommend:

- **Policy BBGF12, change first sentence to "*The areas listed below and shown on the following plan(s) and Proposals Map are designated as Local Green Space where development is ruled out other than in very special circumstances.*"**
- **Delete final sentence of Policy**
- **Delete Site 6 (and delete from Proposals Map/Table 1)**
- **Provide new plan(s) showing the precise location of each Local Green Space, such that all boundaries can be clearly identified**
- **Delete Para 5.5.8**

Policy BBGF13 – Protection of Local Community Facilities

155 Chapter 8 of the Framework, "*Promoting healthy communities,*" recognises the important role that planning can play in facilitating the creation of healthy, inclusive communities. In so doing, it requires planning policies to:

"guard against the unnecessary loss of valued facilities and services...ensure that established shops, facilities and services are retained for the benefit of the community" (Paragraph 70)

156 Policy BBGF13 seeks to protect community facilities and in this respect, it has regard to national policy.

157 The first sentence of the Policy is confusing. No indication is provided of why there is a need to state a presumption in favour of re-using something for a similar use, or of how any such presumption might work in practice. This part of the Policy does not provide a decision maker with a clear indication of how to react to a development proposal.

158 The "*defined and demonstrable benefits*" referred to by the Policy appear vague and imprecise. It is not clear, for example, what the "*investigation*" of another site entails, how it will be monitored and why "*investigation*" is a relevant land use planning policy requirement. No indication is provided of what "*satisfactory evidence*" might comprise, or who would be the judge of this and on what basis. Further, this part of the Policy relies on another Policy not under the control of the Neighbourhood Plan. I also note that it would be unusual and unviable to require re-provision of a facility for which there is no longer a need.

159 The final part of the Policy supports the provision of new community facilities, having regard to the Framework, but like other Policies in the Neighbourhood Plan, it runs the risk of pre-determining the planning application process. It fails to allow for all relevant considerations, such as balancing benefits against harm, to be taken into account and as a consequence, the Policy places an obstacle in the way of the achievement of sustainable development.

160 Taking all of the above into account, I recommend:

- **Policy BBGF13, delete first sentence**

- **Change second sentence to “*The change of use of existing community facilities to other uses will only be supported where it can be demonstrated that there is no longer a need for the existing facility; or that the existing facility will be replaced in an easily accessible location elsewhere in the Neighbourhood Area.*”**
- **Delete Criteria a), b) and c)**
- **Change middle paragraph to “...Development of new community facilities will be supported where:”**
- **Change Criterion h) to “*the proposal would not unduly harm local character or residential amenity*”**
- **Delete Criterion i)**

Landscape and Natural Environment

Policy BBGF14 – Protecting and Enhancing Local Landscape Character

161 Core Strategy Key Statement EN2 (“*Landscape*”) seeks to protect, conserve and wherever possible enhance the landscape character of the AONB.

162 In general terms, Policy BBGF14 seeks to protect landscape character and is in general conformity with Key Statement EN2. However, not all of the Criteria set out within the Policy will be relevant to “*all development.*” I also make comments in respect of cross-referencing and settlement boundaries earlier in this Report.

163 I recommend:

- **Policy BBGF14, change opening paragraph to “*Development must have regard to the distinctive landscape character of the Forest of Bowland Area of Outstanding Natural Beauty (AONB), where appropriate:*”**
- **Change Criterion a) to “*Outside settlement boundaries, retaining the development form...*”**

Policy BBGF15 – Water Management and surface water run-off

164 Chapter 10 of the Framework, "*Meeting the challenge of climate change, flooding and coastal change,*" supports the appropriate provision of sustainable drainage systems and Policy BBGF15 has regard to this.

165 However, by requiring all development sites to provide water attenuation facilities, regardless of the type of site or development proposed, appears unduly onerous and is not justified by any substantive evidence. Further, no indication is provided of how the Neighbourhood Plan will "*encourage*" the storage of rainwater.

166 I recommend:

- **Policy BBGF15, third paragraph, change to "*The provision of appropriate water attenuation facilities such as lagoons, ponds and swales will be supported.*"**
- **Change fourth paragraph to "*The provision of rain water harvesting facilities and/or facilities for the storage of rain water for non-drinking water purposes such as watering gardens and flushing toilets will be supported.*"**

Policy BBGF16 – Renewable Energy

- 167 Chapter 10 of the Framework, *“Meeting the challenge of climate change, flooding and coastal change,”* supports the increased use and supply of renewable and low carbon energy.
- 168 The second part of Policy BBGF16 supports the provision of renewable energy and has regard to national policy. However, the Policy begins by stating that, *“where appropriate,”* energy schemes *“may”* be accommodated. This part of the Policy is imprecise and vague to the point that it fails to provide a decision maker with a clear indication of how to react to a development proposal.
- 169 The first part of the Policy then goes on to make the general statement that micro scale wind energy *“is likely to be the most appropriate form of wind energy development for the AONB.”* Whether or not this is the case, it does not set out comprise a clear, precise land use planning Policy. The ambiguous nature of the Policy is continued by the statement that *“Small scale wind farms may be appropriate for the AONB...”*
- 170 The final sentence of the Policy seeks to afford a guidance document not under the control of the Neighbourhood Plan with development plan Policy status, affording carte blanche Policy support without any supporting detail.
- 171 For clarity, I recommend:
- **Policy BBGF16, delete first two paragraphs (“Where appropriate...development should:”)**
 - **Begin Policy *“Micro and small scale wind energy development and micro hydro development will be supported where it:”***
 - **Delete “be” at beginning of 1st, 2nd, 5th and 6th bullet points**
 - **Begin 3rd bullet point *“is not sited...”***
 - **Begin 4th bullet point *“does not have...”***
 - **Delete final sentence *“Development for...Core Strategy.”***

7. The Neighbourhood Plan: Other Matters

172 I make recommendations with regards the Proposals Maps, Parish Actions and Site Assessments earlier in this Report.

173 The recommendations made in this Report will have a subsequent impact on Policy, page, plan and paragraph numbering.

174 I recommend:

- **Update the Policy, page, plan and paragraph numbering, taking account of the recommendations contained in this Report.**

8. Summary

175 Having regard to all of the above, a number of modifications are recommended in order to enable the Neighbourhood Plan to meet the basic conditions.

176 Subject to these modifications, I confirm that:

- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- the making of the neighbourhood plan contributes to the achievement of sustainable development;
- the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- the making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union (EU) obligations; and
- the making of the neighbourhood plan is not likely to have a significant effect on a European site or a European offshore marine site, either alone or in combination with other plans or projects.

177 Taking the above into account, I find that the Bolton by Bowland and Gisburn Forest Neighbourhood Plan meets the basic conditions. I have already noted above that the Plan meets paragraph 8(1) requirements.

9. Referendum

178 I recommend to Ribble Valley Borough Council that, subject to the modifications proposed, **the Bolton by Bowland and Gisburn Forest Neighbourhood Plan should proceed to Referendum.**

Referendum Area

179 I am required to consider whether the Referendum Area should be extended beyond the Bolton by Bowland and Gisburn Forest Neighbourhood Area.

180 I consider the Neighbourhood Area to be appropriate and there is no substantive evidence to demonstrate that this is not the case. Whilst I note that the nature of administrative boundaries means that people living close by, or adjacent to, the Neighbourhood Area will not have the right to vote at Referendum, this is neither a unique nor an unusual situation.

181 Consequently, I recommend that the Plan should proceed to a Referendum based on the Bolton by Bowland and Gisburn Forest Neighbourhood Area approved by Ribble Valley Borough Council in May 2014.

Nigel McGurk, August 2017
Erimax – Land, Planning and Communities



EST. 2011