

Comments on the 'Pre-Publication Draft Craven Local Plan - Consultation Document'

Thank you for the opportunity to comment on this. The Local Plan is an impressive document and we appreciate all the effort and thought that has gone into its construction. The Plan does raise some issues and questions that are important to the parishioners of Ribble Banks Parish Council and Rathmell village in particular. We will address these in the order in which they arise in the document.

1.15 - Neighbourhood Plans

We welcome the encouragement of these but have previously been advised by CDC planners that our parish council is too small to merit a neighbourhood plan. They are also expensive to produce in terms of both time and money. Parishes with completed or near-completed plans may well have the opportunity to influence and improve development in their areas but, in other cases, it might take five years for a neighbourhood plan to reach fruition regardless of the support available from CDC. In these instances, any initiatives and proposals brought forward by their communities could simply be ignored by planners until neighbourhood plans were in place.

Question - In the absence of fully approved neighbourhood plans are initiatives and proposals from local communities valueless?

4.00 - Housing Growth

We consider option C for housing growth to be a sensible choice. We are also encouraged by the value that the local plan puts on the construction of a high proportion of smaller family dwellings with a target of just 17% for properties of four or more bedrooms and, consequently, 83% being three bedrooms or less.

It is worth considering how CDC planners will approach this 17/83 ambition. If these targets are to apply uniformly across Craven then the Local Plan will have to take precedence in planning decisions and, given the current weak nature of planning regulations, this is a questionable assumption. If, on the other hand, 17/83 is merely an overall target for Craven then it seems to us that smaller properties will simply be concentrated in larger conurbations with a disproportionate number of large properties constructed in smaller settlements. We already have experience of this in Rathmell where an attractive, 25/75 outline plan was supported by RBPC on the grounds that it would provide affordability and diversity in the village. Ultimately, the development turned out to be an incongruous 75/25 arrangement; fully supported by CDC planners.

Question - How will CDC ensure that the Local Plan target of a 17/83 proportion of larger and smaller properties is met?

4.23 - The Additional 12%

We are not convinced by the claim that an additional, compensatory 12% needs to be added in order to achieve the target of 4280 properties by 2032. Losses of this order might well have occurred in the historic 10 year period that is cited but the assumption cannot legitimately be made that this will continue in the future, particularly when a large proportion of projected Local Plan development is on greenfield sites. In Rathmell, for example, we are unaware of any housing loss; indeed windfall gains in housing are, in our experience, more likely. We would imagine that this is common to many Craven parishes. If significant losses were to become apparent over the life of the Local Plan then we would hope that the Plan would be sufficiently flexible to accommodate these shortfalls in the areas concerned - a much better approach than adding a global and statistically suspect 12%.

4.39 - 32 Dwellings per Hectare

We do understand what a density of 32 dwellings/hectare looks like. We have a half-complete development in Rathmell that comprises four dwellings on a 1255m² plot (CDC planning website) and we calculate this to be 32 dwellings/hectare. In a larger settlement this density might be commonplace and acceptable but in this small rural village it is totally out of character and totally at odds with the Good Design sentiments expressed in the Local Plan 5.25. CDC planners have also endowed the village with another recent small development at a density of 41 dwellings/hectare.

We wonder if the authors of the Local Plan have ever visited the village. If they have, they will have seen that the Rathmell is deeply rural, and that properties tend to be small but well-spaced with generous garden provision. They might also have gathered that the relative remoteness of the village requires many households to own two vehicles.

We note that for both proposed development sites in Rathmell the number of dwellings is calculated on a density of 32 dwellings/hectare but we have difficulty understanding how this can be done whilst maintaining the rural character of the village, providing adequate gardens and parking space, and allowing for the thoughtful landscaping that will be needed if the rural integrity and environmental quality of the sites are to be maintained or enhanced.

Question - Can you help our understanding?

4.47 - Villages with Basic Services

We see that the Local Plan defines Rathmell as a 'Village with Basic Services' along with eight other settlements. However, a comparison of Rathmell with these other villages reveals that it is hugely different in terms of character, population, connectivity, and services available. In comparison with Rathmell these other places are cities and we are surprised that these differences seem to have gone unnoticed.

Rathmell Primary School closes this week; not just for the summer holidays but for good. This is, therefore, an appropriate time to update the Local Plan on the extent of services in Rathmell.

We have:

An Anglican Church, a Methodist Chapel, a small, leased community centre, and a post box. The Tosside/Settle/Horton bus goes through the village three times a day.

We do **not** have:

A school, a shop, a pub, a play area, pavements, street lighting, on-road parking, mains gas, good internet services and lots of other things.

Question - What are the criteria for villages with basic services?

4.61 - Table 7 Inaccuracy?

We note that this table specifies just 1 completion in Rathmell up to 31/3/17. Without researching the issue further, we suspect that the Beauty development in Rathmell was completed before this. Certainly there was an open day before this time and we imagine the first property had been sold by then. If this was indeed the case then the net completions would be 5 and the residual requirement 29. The dubious 12% tariff would now, to the nearest whole number, be 3, the gross residual figure would be 32, and the OPPs 13.

Question - Does this make the Gross requirement 19 rather than 20?

Policies Map 8

Can we also draw your attention to errors in the Local Plan Policies Map, Inset Map 8; Rathmell so that this can be amended.

Three areas on this map are shaded yellow indicating 'Open Space, Sport and Recreational Facilities'.

One of these areas is the primary school playing field. This area is not owned by the school and, since the primary school has now closed, it is our understanding that it will be assimilated into the adjoining pasture.

Another area, to the south, was, at one time, the Rathmell cricket pitch. It is no longer in use as a cricket pitch and has reverted to pasture.

The third shaded area, to the east, is the church graveyard. This has no sporting or recreational purpose. It remains an open space though it is filling up.

RA001 & RA004

We agree with the development principles listed for these two sites. RA001 is rightly recognised as being in a prominent location but it needs to be remembered that both sites are on the edge of open countryside and thoughtful design will be required if their boundaries are to be diffuse and harmonious. This will be very difficult given the crude approach adopted by the Local Plan - site area x 32. We imagine there will be a number of sites in Craven where the x32 model is inappropriate because the consequences for the surrounding areas are too damaging and we are concerned that this may well be the case in Rathmell. **It is odd for the Plan to state that 'proposals should be carefully and sensitively designed to minimise visual impact on the character and appearance of the area' but then to make little space available for this to happen.** The Rathmell sites merit more than buildings, roads, and the odd, token, flowering cherry if they are to enhance rather than diminish their surroundings.

'Rathmell is one of many small settlements in Craven which has a high quality of environment. There is little, if any, potential for new development to be accommodated here without detriment to the village's basic form and character therefore local plan policies should respect the parish's rural character and development should be limited to conversion, infilling and small scale development appropriate to the existing form and character of the settlement'.

The paragraph above is not written by us - it is the final paragraph written by Craven planners in their 'Local Plan - Survey and Appraisal of the Parish of Rathmell - July 1994'. We are happy that the conclusions that were reached on that occasion still apply today.

The Local Plan contains much that is praiseworthy and we would agree with its stance on many of the issues it addresses. In particular, we would fully support its ambitions on biodiversity, climate change, low carbon energy, light pollution, sustainability, and good design. If this Local Plan is adopted, however, it remains to be seen if its aspirations can be translated into genuine

improvements on the ground. We do hope that CDC planners, supported by the Local Plan, will have the interest, capacity, and powers needed to ensure delivery of the Plan's qualities.

The comments that we have made about the Local Plan are honest and, we hope, constructive. We trust that they will be considered fully and that the questions we have raised will gain responses. We would also wish to be assured that this submission will be made available to the Inspector when the Plan is formally submitted for approval. It may be that the authors of the Plan have not had the opportunity to visit Ribble Banks and Rathmell in particular to see for themselves the opportunities and challenges posed by development in the parish. If this is the case, then we are happy to organise and host a visit.

Cllr. John Ketchell