

RIBBLE VALLEY BOROUGH COUNCIL REPORT TO PLANNING AND DEVELOPMENT COMMITTEE

Agenda Item No.

meeting date: THURSDAY, 22 JUNE 2017
title: HOUSING AND ECONOMIC DEVELOPMENT PLAN DOCUMENT (DPD) –
REGULATION 19 RESPONSE AND PROPOSED SUBMISSION
submitted by: CHIEF EXECUTIVE
principal author: COLIN HIRST

1 PURPOSE

1.1 To receive information and consider issues arising from the regulation 19 consultation on the draft DPD, to confirm the approach to any changes arising and agree the submission of the DPD to the Secretary of State.

1.2 Relevance to the Council's ambitions and priorities:

- Council Ambitions - the HEDPD is part of the Local Development Framework (LDF) sitting together with the adopted Core Strategy. It will help in the delivery of housing, employment and the protection and enhancement of the environment, ultimately presenting the delivery strategy for implementing the vision for the Ribble Valley for the next 20 years.
- Community Objectives – as a tool for delivering spatial policy, the HEDPD identifies how a range of issues relating to the objectives of a sustainable economy, thriving market towns and housing provision will be addressed through the planning system.
- Corporate Priorities – the HEDPD is a key document of the LDF and will provide up to date planning policy tools which will aid performance and consistency.
- Other Considerations – the Council has a duty to prepare spatial policy under the LDF system.

2 BACKGROUND

2.1 The Council has recently completed the formal 'Regulation 19' consultation stage in preparing its HEDPD for the borough. Members have recently considered a report on taking the HEDPD forward and are now presented with information that summarises the issues raised in response to the consultation. The regulation 19, draft plan is available at the following link. Members may wish to have access to this at the meeting. https://www.ribblevalley.gov.uk/download/downloads/id/11036/reg_19_publication_hed_dpd_april_2017pdf.pdf

2.2 Members should be aware that at this stage, the information is intended to help an Inspector understand the range of issues that has emerged. At this stage, the Council does not present a full or detailed response to the representations as this will emerge through the Examination process. Copies of the full submissions are available for reference at the Council offices. As part of the submission process, the Council will

need to produce a regulatory statement that provides a summary of issues for the Inspector.

- 2.3 The consultation response has generated responses on a limited number of issues and at this stage in the process, it is not anticipated that substantive amendments are necessary. A number of points of technical accuracy have been identified and suggested refinements to wording to improve clarity and understanding. Members will be provided with more details at the meeting.
- 2.4 Having identified issues at this stage, any amendments that the Council considers are required will need to be highlighted and consulted upon.
- 2.5 For expediency it is proposed to submit the HEDPD incorporating any changes for Examination as per the approach accepted for the Core Strategy. This approach brings some risks as the changes will not have been tested nor will all parties have had opportunity to confirm if the proposals address the concerns raised before submission. Whilst it would be a more robust approach to build time into the process to undertake this work this will inevitably delay the programme to have an up to date plan in place.
- 2.6 The Council is moving towards the formal stage where the HEDPD is submitted to the Secretary of State for Examination. An Independent Inspector will be appointed to hold the Examination with the purpose of confirming that the plan is sound. The Council will need to be able to satisfy the Inspector that the plan has been prepared in accord with the duty to co-operate, legal and procedural requirements and whether it is fundamentally sound. (Paragraph 182 of the National Planning Policy Framework NPPF, refers). The NPPF sets out what constitutes a sound plan and consequently to be found sound the Council will need to demonstrate how it has addressed the NPPF tests. These tests are summarised as follows:
 - **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the framework.

3 SUBMISSION STAGE

- 3.1 The Council is now moving towards submission stage in the plan-making process which triggers the start of the Examination stage. As Members are aware, the completion of the HEDP and its adoption will complete the policy coverage in the borough with the HEDP and the proposals map in particular bringing the Local Development Framework up to date. It is important to have this in place as soon as possible and an early

examination will enable this. Progress on the plan has been the subject of input throughout from the Development Plan Working Group who have identified the importance of progressing the plan to adoption. What is important to bear in mind is that the HEDP process is not a review of the Core Strategy. A number of the matters raised in the representations are considered matters for the future review of the Core Strategy which will be the subject of a further report to this Committee, as part of the Council's Annual Authority Monitoring Report (AMR).

3.2 In terms of response to many of the representations the response will be that the issues are matters for the review. In some instances where additional allocations are being sought particularly employment land, it is considered that should applications come forward, they can be accommodated within the existing policy framework provided by the Core Strategy. As Members are aware, given the current housing supply position, it is considered that any need to address flexibility in supply can also be addressed within the framework of the Core Strategy and consequently it is not intended to be seeking to promote additional housing sites to meet the Core Strategy requirements. Sites can be considered against the Core Strategy as necessary but also will be subject to consideration in due course as part of the review process.

3.3 On this basis the programme of key dates is as follows:

STAGE	TARGET DATE
• Consideration of representations, the Council's response and proposed amendments, including resolution to formally submit	Planning and Development Committee 22 June
• Ratification of submission	Full Council 5 July
• Commence formal consultation on any proposed changes	w/c 31 July
• Formally submit to the Secretary of State	w/c 31 July
• Earliest likely hearing dates	October 2017

4 SUMMARY OF ISSUES

4.1 As indicated above, at this stage of the process the Council needs to identify, in general terms the range and extent of issues that have arisen from the publication of the HEDPD. This is not intended as a full and detailed response by the Council rather it will help inform the Inspector's deliberations. The summary schedule is attached at Appendix 1.

4.2 Broadly speaking there are a number of general topic areas that the issues can be broken down into namely:

- General responses from consultative bodies/organisations
- Responses to employment land – in particular land at Higher College Farm, Longridge
- Housing land allocations: Wilpshire
- Housing land allocations: Mellor
- General queries criticising lack of 5 year land supply, and flexibility in the plan
- Promotion of specific sites by land owners/agents
- A number of detailed points around open spaces and definition of settlement boundaries

- 4.3 Of the 138 responses made, some 20 individuals have indicated that they would wish to appear at a hearing. As Members will recall, significantly less than was the case with the Core Strategy.
- 4.4 Members will be provided with further information on any suggested amendments at the meeting due to the publication requirements for Committee papers and the close date of the consultation. As the number and nature of amendments are limited, it is proposed that where amendments are considered appropriate, a delegated approval process is put in place. The identified changes would be agreed by the Chair and Vice Chair of Planning and Development Committee, in consultation with the Chief Executive and the Development Plan Working Group. This will enable any proposed amendments to be considered and agreed for ratification by Full Council ahead of submission. If the submission is not ratified by Full Council on 15 July the next scheduled opportunity will be Council in October, which would not help deliver progress on the plan.
- 4.5 It is proposed that the HEDPD Regulation 19 draft as amended by any identified changes, is agreed to form the submission version of the HEDPD, from which a composite document will be prepared for reference. Submission of the HEDPD will also require the preparation of a number of supporting documents to meet the applicable regulations and these documents will be drawn up as part of the submission process.
- 4.6 Members' attention is drawn to the need to ensure that any amendments proposed in response to the Regulation 19 Consultation will need to be the subject of testing through the Sustainability Appraisal work. This will be undertaken by the Council's existing consultants, Acardis Consulting who have undertaken the appraisal work so far. This will be an additional cost to the core work already undertaken, the cost of which will be related of course to the extent of changes proposed. Members will recall that provision has been included in the HEDPD budget to meet such potential, additional consultancy needs.

5 NEXT STEPS

- 5.1 Subject to the consideration of any proposed changes the intention would be following ratification of this Committee's decision at Full Council to prepare the necessary documentation to enable the HEDPD to be formally submitted for Examination. In addition, in line with advice the changes would be published for consideration to enable the results to be available to the Inspector.
- 5.2 Upon submission the Council would be notified of the appointed Inspector and a date would be likely to be set for a pre-examination meeting, usually around 4 weeks after submission. That meeting would confirm the issues the Inspector considered pertinent to examine, raise any initial concerns identified by the Inspector and set the course for any hearing dates. The hearing dates would usually commence around 10 weeks from the pre-examination meeting depending on matters arising. PINS have indicated given the limited number of issues and people wishing to attend hearings that timeframes may be condensed.

6 RISK ASSESSMENT

- 6.1 The approval of this report may have the following implications:

- Resources – Members have agreed a budget to progress the HEDPD.
- Technical, Environmental and Legal – The Council has to follow the statutory regulations in preparing the HEDPD. The selected approach brings with it a series of risks that the Council may be challenged upon or that an Inspector may not be satisfied with which would have an impact on the process and costs incurred. As Members are aware the main evidence base is that of the Core Strategy. There is a risk that the Inspector may require some elements of this to be updated in order to progress the Examination.
- Political – There is public interest in the HEDPD.
- Reputation – Decisions taken in connection with the HEDPD will help demonstrate the Council's obligations to fulfil its statutory duties and meet its objective of being a well run Council.
- Equality & Diversity – No implications identified.

7 RECOMMENDED THAT COMMITTEE

- 7.1 Note the matters raised in the summary of representations set out in appendix 1 to this report and agree that the consideration of any resultant proposed amendments be delegated to the Chair and Vice Chair of Planning and Development Committee, in consultation with the Chief Executive and the Development Plan Working Group, and that any proposed amendments be published for 6 weeks public consultation.
- 7.2 Agree that the submission HEDPD be comprised of the published Regulation 19 document as amended by the agreed changes and that a composite document be prepared as the Submission HEDPD as soon as practicable.
- 7.3 That subject to confirmation by Full Council and having prepared the necessary submission documents in accord with the relevant regulations, to submit the HEDPD as amended to the Secretary of State for formal Examination as soon as possible.

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CHIEF EXECUTIVE

BACKGROUND PAPERS

HEDPD files – various.

For further information please ask for Colin Hirst, extension 4503.

HED DPD Regulation 19 Consultation Response Summary

Summary of representations by consultation bodies, special interest groups, landowners and developers and private individuals.

June 2017

Introduction

This report summarises the main issues raised by the wide variety of private individuals and organisations that responded to the Regulation 19 Core Strategy consultation. It is not intended as an exhaustive list of all the individual points made by each responder together with the Council's response to each point. This latter work is currently in progress and will be presented to the Planning Inspectorate as part of the preparations for the Housing and Economic Development DPD Examination in Public later this year.

The responses were made in a variety of formats; many of those supplied by adjacent local authorities, government agencies and planning consultancies followed the formal structure of the response forms supplied by the Council and specified the individual part of the document and the individual 'soundness' tests prescribed in planning legislation that were felt to be relevant. The majority of local private individuals tended to respond by letter or email. It should be borne in mind that many responders made more than one point so the number of responses and the number of responders will not be the same.

Table 1 sets out the issues raised during the consultation and provides an overview. Redacted copies of all responses made to the Council in the consultation are available on request at Planning reception in the Council Offices.

Section 1: Table 1

The following table provides a brief overview of the representations made to the Reg 19 HED DPD consultation received by consultation bodies, special interest groups, land owners, developers and private individuals.

NAME	BRIEF SUMMARY OF ISSUE(S) RAISED
Environment Agency (Env Ag 1)	Satisfied that the DPD is Sound from an Environment Agency perspective.
Blackburn with Darwen BC	Any transport assessments considering HAL2 must align with assessments undertaken on Blackburn side of boundary in terms of assumptions regarding planned and committed development traffic generation and impact. BwD must be consulted at scoping stage on any Transport assessment for site HAL2.
Pendle Borough Council	Do not consider that the HEDPD presents any significant cross boundary issues with Pendle.
Lancashire County Council (Sch 1)	Request an extension to deadline to make response.
Historic England	No comment to make
Natural England (Nat Eng1)	Makes specific reference to the Habitats regulations Assessment; seeking more information and explanation of how the conclusion has been reached.
Electricity North West	While noting that the proposed allocations could have an impact on their infrastructure this will be reviewed through the planning application process. No objection in principal.
Highways England	Consider that the allocations are unlikely to generate volumes of traffic sufficient to require RVBC to work with HE to improve the Strategic Highway Network in

	the area.
The Coal Authority	Considers all proposed allocations and the Proposals Map in the HED DPD are Positivity Prepared, Justified, Effective and Consistent with National Policy. Considers the Legal and Procedural requirements including duty to co-operate have been met.
North Yorkshire County Council	No specific comments. Discusses the NYCC LTP4.
Longridge Town Council	Considers that the HEDPD removes two of the original employment sites and regrets this. Feels also that the Core Strategy should have within it an Employment Strategy
Mellor Parish Council	Objects to HAL1 on the grounds of potential road drain flooding.
Wilpshire Parish Council	Consider that the southern boundary of HAL2 be redrawn further north to retain current woodland to act as a buffer along the boundary with Blackburn. Also offer observations about poor access; that the site should be related to latest housing needs and that the skyline be well screened.
Langho Parish Council (Langho PC1)	Support for the approach of the Council in not pursuing specific sites in the Langho area put forward at the "Call for Sites" stage. Support for the proposals for additional open space sites (OS1) at Brockhall and Langho. The PC is also keen to see land at Longworth Road Bilington protected from development because of flooding issues. The PC supports provision of employment sites especially the brownfield site at TIME (Simonstone)
Ribchester Parish Council (Rib PC1)	Objection to the employment allocation at Higher College Farm EAL3 and consider the plan is not sound because it fails to take account of the negative effects of the development summarised as: transport and highway impacts; visual and environmental impacts; possible pollution of local watercourses. Considers the proposed site is removed.
Barrow Parish Council (Bar PC 1)	Supports assertion that the housing allocation in Barrow has been satisfied. Supports the commitment to promoting employment opportunities at the Barrow Enterprise Park. Consider that the DPD does not recognise the importance of flood risk management within Barrow.
Chatburn Parish Council (Chat PC1)	Supports proposed settlement boundary for Chatburn and recommendations in the document.
Whittingham Parish Council (Whit PC1)	Concerns about impact of growth in Preston on Whittingham. Insufficient consultation between Ribble Valley, Preston CC and the parish council. Concerned to ensure local roads and infrastructure will be improves rather than contributions being spent county wide. The PC would like to see a masterplan showing development sites, infrastructure improvements and preferred access. Objection to Higher College Farm allocation (EAL3) due to major traffic impact on Whittingham area.

Hothersall Parish Council (Hoth PC1)	Objects to EAL3. Considers there is no evidential need, allocation of this site would allocate more than is needed, the choice of the site, the impact on its character and concerns relating to the deliverability of the site and therefore considers it is unsound. Windfall development would suffice. Consider that recent approvals have reduced the over residual need. Concerns over traffic impact, (and traffic impact on the school) public rights of way and the AONB as well as BHSs and flooding concerns.
Mellor Ward Councillor	Supports HAL1.
Rimington Ward Councillor	Considers that there are inaccuracies in the Sport England evidence document that in part underpins the Open Space and recreation Topic Paper.
Chatburn Cllr 1	Considers that the HED DPD will help to complete the LDF for the area. Fully support the new settlement boundary fort Chatburn.
Home Builders Federation (HBF)	Objects to approach to housing allocations. Plan considered unsound (not effective or positively prepared) due to lack of flexibility in meeting housing requirement. Buffer should be larger. Questions the 5-yr supply.
CPRE	Considers there is a justification to plan for a reduced number of homes. Requests that DS1 is referenced to encourage use of Previously developed land instead of greenfield. Advocate masterplanning of HAL1 and HAL2 to ensure green infrastructure and open space. Should be protection for trees, hedgerows flood risk and ecology.
Sport England (Spen 1)	Recommend additional wording to Policy OS1. Consider a link to the Council's evidence base on open space, sport and recreation. Considers there to be an evidence gap.
Barrow resident	General regret at perceived over development of Barrow due to permissions already granted.
Read and Simonstone resident (Read and S res resp 1) obo "Hammond Ground Residents' Group"	Support the proposed settlement boundary for Read and Simonstone and non-allocation of Hammond Ground site.
Newton resident (Newton res resp 1)	Objects to designation of DMB 4 Open Space site on his property at Lowood and attaches evidence of lack of public access.
Clitheroe resident (Clith res 1)	Objects to the granting of permission for housing at Wadow View. Feels that it should have been refused due to impact on wildlife, traffic, air pollution.
Clitheroe resident (Clith res 2)	Feels that, due to poor access, there should be no further development in that part of Clitheroe to the west of the railway line until better access supplied.
Clitheroe resident (Clith res 3)	Response relates to town centre boundary and settlement boundary for Clitheroe. Settlement Boundary should be redrawn to allow potential future development and address housing delivery issues.
Clitheroe resident (Clith res 4)	Settlement boundary should be amended to take account of dwelling under construction adjacent to the

	Black Horse Inn at Pimlico
Langho landowner (Langho site 1)	Proposes a housing site near to Langho
Longridge resident (Long res 1)	Objects to HEDPD on the following grounds: houses already permitted are over-priced in relation to needs of local people; there are no Traveller Sites on the Proposals maps; local roads are inadequate. Also objects to EAL 3 feels that there are more appropriate sites in Preston. Also feels that the plan is too dependent economically on the success of the BAe site at Samlesbury
Longridge resident (resident Willows Park)	Asserts that site 37 in the RVBC SHLAA of 2009 is unavailable for development due to restrictive land ownership issues. No allocation of this site is proposed within the HEDPD.
Chatburn resident (Chatsby res resp 1)	Supports proposed Chatburn settlement boundary
Chatburn resident (Chatsby res resp 2)	Support the revised settlement boundaries. These boundaries will protect the Ribble Valley from over development and specifically will keep Chatburn' s rural identity.
Tosside resident (Tosside res 1)	Feels that the current methodology for calculating housing need nationally is flawed. Also feels that Neighbourhood Plans are exploiting errors in the system to develop rural greenfield sites. Goes on to criticise the developing Bolton by Bowland and Gisburn Forest Neighbourhood Plan.
Whalley resident (Why res 1)	Objects to any more development in Whalley on the grounds of flood risk and impact on wildlife partly in relation to the Accrington Road permission.
Wilpshire resident (resident Wilpshire 1)	Supports HAL2 Also feels that adjacent boundary with Blackburn needs clearly marking.
Wilpshire resident (HAL2 resident resp 1)	Objects to HAL2 on grounds of impact on schooling; traffic generation; access, drainage and impact on wildlife.
Wilpshire resident (HAL2 resident resp 2)	Supports HAL2 but feels that only a (unspecified) part should be considered. Also feels that the southern wooded area south of pylons should be retained as a visual buffer with Blackburn
Wilpshire resident (HAL2 res resp 3)	Objects to HAL 2 on the grounds of impact on local wildlife and environment.
Wilshire resident (HAL2 res resp 3 additional)	Considers plan is unsound (not justified or effective). Object to inclusion of woodland at southern end of HAL2; seeks its removal from the allocation.
Wilpshire resident (HAL2 resident resp 4)	Objects to HAL2 on grounds of impact on wildlife; traffic generation; poor local transport.
Wilpshire resident (HAL2 resident resp 5)	Objects to HAL 2 on the grounds of impact on local wildlife and environment; presence of pylons and water pipeline; drainage
Wilpshire resident (HAL2 resident resp 6)	Objects to HAL 2 on the grounds of: drainage, Minerals designation; impact on wildlife and environment; access, traffic generation, noise generation, presence of pylons and water pipelines, impact on local schools and presence of a former landfill site 250m away; impact on local house prices; relationship of size of site

	to Wilpshire's quoted housing need.
Wilpshire resident (HAL2 resident resp 7)	Objects to HAL 2 on grounds of impact on wildlife.
Wilpshire resident (HAL2 resident resp 8)	Objects to HAL 2 on the grounds of: traffic generation; access, pressure on local schools; drainage, impact on local wildlife.
Wilpshire resident (HAL2 res resp 9)	Supports HAL2. Would like to see the southern boundary of HAL2 reconsidered to prevent development right up to the BwD border. The whole of HAL2 is not needed as the residual is lower than the amount that the site can provide. Also wishes to see the land on the east of the site removed from the allocation.
Wilpshire resident (HAL2 res resp 10)	Objection to HAL2. Response sent to BwD and forwarded to RV from Officers at BwD. Concern over wildlife habitats and congestion.
Wilpshire resident (HAL2 res resp 11)	Objects to HAL2 on grounds of drainage, wildlife (birds), privacy concerns on existing properties, increase in traffic and development on greenfield land. Also confusion regarding the site being 'safeguarded' in the DWLP.
Wilpshire resident (HAL2 resident resp 12)	Object to HAL2 on grounds of land drainage and access to the A666, particularly in relation to congestion.
Wilpshire resident (HAL2 res resp 13)	Objects to HAL2 and considers it not be sound due to traffic concerns and congestion and previous fatalities. Would make it difficult for emergency services to get to and from the A59 due to congestion.
Wilpshire resident (HAL2 res resp 14)	Objects to HAL2. Consider there to be ancient woodland on the site.
Wilpshire resident (HAL2 res resp 15)	Objects to HAL2. Impact on wildlife and natural habitat.
Wilpshire resident (HAL2 res resp 16)	Supports HAL2.
Wilpshire resident (HAL2 res resp 17)	Support for HLA2. Acknowledges that housing is needed.
Wilpshire resident (HAL2 re resp 18)	Considers that Wilpshire 3 (HAL2) is best to meet housing needs in the area. It has better access than the two smaller sites.
Wilpshire resident (HAL2 res resp 19)	Comments regarding housing sites in Wilpshire: Support the Council's decision not to allocate sites 1 & 2. Support inclusion of Wilpshire 3 (HAL2) in settlement boundary but that trees on southern part of site should be protected.
Wilpshire resident (HAL2 res resp 20)	Considers Wilpshire 3 is only realistic and viable place to build in Wilpshire. Other sites problematic.
Developer (Devpr 1)	Objects to plan as the Council cannot evidence a 5 year housing supply therefore the plan should not be adopted. Additional sites should be allocated to address this. Requests that the SB be altered and site at Higher Road Longridge should be allocated for housing.
Developer (Devpr 2)	Object to the DPD on basis it is unsound because it is not justified, effective, consistent with national policy or

	positively prepared. Details relate to: need to include the whole evidence base in consultation; need for updated SHMA, housing land position and review of objectively assessed housing need/requirement; concern that the housing requirement is treated as a maximum target not minimum; concerns about under delivery, including the strategic site at Standen; the need to allocate further sites; the need to deliver affordable housing; and the residual requirement in Longridge where it is considered further allocations should be made. In addition it is considered that the Settlement boundary should be amended to take account of the full extent of the approved housing site on land east of Chipping Lane.
Developer (Devpr 3)	Policy HAL- considers not Positively Prepared as there is no flexibility in meeting the housing requirement set out in the Core Strategy. Considers there to be a shortfall in land supply. Buffer should be greater. Advocate a site at Hawthorne Farm in Clitheroe. Wish to participate at EiP.
Developer (Devpr 4)	Considers plan lacks flexibility with only a small number of allocations. Don't agree with 5 year supply methodology. Consider a Local Plan review should be undertaken promptly.
Agent (Ag 1)	Supports withdrawal of Open Space designation as expressed in Resultant Changes document Map 8 "Proposed withdrawal of Open Space site – S of Pendle Street east, Sabden)
Agent (Ag 2)	Supports change proposed in HEDPD to the northern settlement boundary of Barrow (Resultant Changes document Map 2 "Proposed Alteration to Settlement Boundary – Barrow")
Agent (Ag 3)	Proposes an additional housing site adjacent to Clitheroe put forward in the HED DPD Reg 18 Call for Sites on the grounds that the site is suitable and sustainable one in relation to NPPF and the need for flexibility in housing land provision and the vulnerability of the council's 5 year supply position.
Agent (Ag 4)	Suggest modification to settlement boundary at Chatburn Old Road, Chatburn to include additional land and exclude it from EN2 designation. Considers that the site has potential for housing development and would provide more robust, logical and defensible boundary. Without modification the plan is considered unsound. (Site submitted at Reg 18 stage as "call for sites" for allocation for housing).
Agent (Ag 5)	Seeks modification to plan to allocate land at Highmoor Park for employment purposes and exclude it from EN2 and DMB4 designations. Without modification the plan is considered unsound. Submission to be read in conjunction with one relating to adjacent land seeking allocation for housing (Ag 3). Employment land requirement should not be considered a maximum. The site is well located, sustainable and deliverable

	and would provide flexibility and choice for employment land.
Agent (Ag 6)	Plan is legally compliant and sound in relation to Employment Allocation EAL3 Higher College Farm
Agent (Ag 7)	Considers that the SA contains errors and errors in relation to the site details for Hammond Ground, Read. Disagrees with tight settlement boundary in Read. Needs clarification that the 5600 dwellings over the plan period is not a maximum as this is currently misleading.
Agent (Ag 8)	Object to HAL2 as not Sound (not positively prepared, Justified or Consistent with National Policy) as no reasoned justification for progressing Wiltshire 3 is given. Considers that the SA contains errors. Needs clarification that the 5600 dwellings over the plan period is not a maximum as this is currently misleading.
Agent (Ag 9)	New site submitted at Langho. Noted.
Agent (Ag 10)	New site submitted at Clitheroe. Noted.
Agent (Ag 11)	Proposes additional employment site in Clitheroe (Land off Lincoln Way). Considers that SA omits information.
Agent (Ag 12)	Proposes additional employment site in Clitheroe (abutting Salthill Industrial Estate). Considers that SA omits information.
Agent (Ag 13)	Considers that HED DPD is only planning to meet the minimum requirements and should plan for more. All sites within or on the periphery of all settlements should be allocated. Site submitted on Longridge boundary. Consider that there are anomalies with the settlement boundary topic paper. Includes plans for areas consider should be in the settlement boundary.
Agent (Ag 14)	Considers that HED DPD is only planning to meet the minimum requirements and should plan for more. All sites within or on the periphery of all settlements should be allocated. Site submitted in Mellor Brow.
Agent (Ag 15)	Consider should allocating additional sites.
Agent (Ag 16)	Pleased with settlement boundary for Barrow. Considers more provision should be made for housing to deliver the 5,600 units. Objects to identification of allotments on Barrowlands site- request amendment to Proposals Map. OS1 should be based upon a robust assessment to be sound. OS1 wording is inconsistent with NPPF para 74 – alternative wording is suggested.
Agent (Ag 17)	Suggests boundary at Dale View, Billington be amended to take potential flood risk into account. Proposed alternative boundary provided.
Agent (Ag 18)	Submits site at Copster Green for allocation.
Agent (Ag 19)	Submits site in Gisburn for allocation for housing.
Agent (Ag 20)	Supports settlement boundary amendment.
Agent (Ag 21)	Support the inclusion of 'committed' housing sites on the Proposals Map. Couldn't see the draft Proposals Map as part of the Reg 19 consultation. Expect to see a composite Proposals Map at submission stage.

	Considers that more than the minimum housing requirements should be planned for and should have 'reserve housing sites'. 20% buffer should be included. Have undertaken own SA Scoring. Puts forward a site for housing (HLM land phases 2-4).
Agent (Ag 22)	Supports HAL2. Considers that should plan for more than the minimum housing requirement and submits a scheme for HAL2 for 120-140 dwellings. Suggests policy wording amendments.
Agent (Ag 23)	Site at Grimbaldeston Farm has been deferred and delegated for P&D committee and should therefore be included within the defined settlement boundary of Longridge.
Agent (Ag 24)	Suggests amendment to settlement boundary at Dale View, Billington to consider potential concerns over flood risk. Concur with representation Ag 17.
Agent (Ag 25)	Submitting a housing site at Copster Green (a resubmission of Reg 18 representations).
Agent 26 (Ag 26)	Plan considered unsound, not positively prepared. Council's approach of meet minimum housing requirements and seeking allocations in settlements with residual requirement is fundamentally flawed and will fail to deliver requirement. Additional suitable sites should be allocated including within Barrow. Specific site suggested.
Agent 27 (Ag 27)	Plan considered unsound (not justified, consistent with national policy or positively prepared) in relation to land at Mellor Brook. Settlement and Green Belt boundaries at Mellor Brook should be altered to include some modest housing and or employment development especially in vicinity of Mill Cottage.
Agent (Ag 28)	Promotes an additional housing site located north of the A59/B6245 at Copster Green
Agent 29 (Ag 29)	Plan considered unsound (not justified, effective, consistent with national policy or positively prepared). Stonyhurst College and its estate should be included in Hurst Green settlement boundary and specific policy drafted for the college to recognise educational and ancillary needs including limited residential development.
Agent 30 (Ag 30)	Considers that the plan is not legally compliant or sound. Land at and adjoining the old Zoo at Brockhall Village should be included within the Settlement Boundary, not Open Countryside; it provides a good infill opportunity for residential development.
Agent 31 (Ag 31)	Considers plan is unsound (not justified). Settlement boundary at Osbaldeston is inconsistent with methodology. Considers it should be changed to include all properties physically linked to main part of settlement. Would allow for limited infill.
Hothersall resident (Hoth 1)	Objects to EAL 3 on the grounds of being inappropriate within a rural area..
Hothersall resident (Hoth 2)	Objects to EAL 3 on the grounds of traffic and road

	safety and visual impact.
Hothersall resident (3017 Objector)	Objects to EAL 3 on grounds of: health and safety relating to road safety. Local roads already congested.
Hothersall resident (resident re BKW resp 1)	Objects to EAL 3 on the grounds of: increased traffic and road safety; impact on local views, effect on local school children, the lack of evidence that it will actually create genuinely new jobs.
Individual 1	Objects to EAL3 on grounds of impacts on ecology, woodlands (including ancient woodlands), damage to environment, open countryside and biodiversity.
Individual 2	Objects to EAL3 because of impacts on: nearby local heritage and biological heritage assets; open views; recreational routes; highway and traffic impacts. The site is outside the A59 corridor which the Core Strategy promotes for employment development.
Longridge resident (EAL3 resident resp 1)	Objects to EAL3 on the grounds of: traffic noise and vibration (including noise and movement generated by alleged unpermitted uses), and road safety impacts; its effect on local school for autistic children, there are better sites in adjacent local authority areas that are served by public transport; feels that there are appropriate brownfield sites available, that there is no actual need for this site as the evidenced need has already been satisfied; that fundamentally this is a greenfield area unsuitable for significant employment uses. Cites a refusal from 2006 in support of objection. Feels that it contravenes the emerging Longridge Neighbourhood Plan.
EAL3 res resp 1 addl 5 points (same respondent as EAL3 resident resp 1)	Additional points made in supplementary submission: Points R1, R2, R3, R4 and R5: Reiterates comments made under "Hothersall resident (EAL3 resident resp 1)" response and suggests text to the HED DPD to make it sound. Requests to speak at EiP. Questions the Cross boundary working, specifically in relation to Longridge /Preston. Makes comment on the SA, with specific focus on the highways/ traffic elements. States that consultation process was flawed. States that the Approach to Plan Preparation document is not Effectively, Positively Prepared, Justified or Effective.
Hothersall resident (EAL 3 res resp 2)	Objects to HAL 3 on grounds of: traffic generation and road safety; better brownfield sites available; lack of utilities; visual impact.
Longridge Resident (EAL3 res resp 3)	Object to the employment allocation at Higher College Farm EAL3 on highway/traffic grounds: proposal too close to residential areas, schools and playgrounds; industrial uses could be create pollution and noise; roads insufficient for pedestrian foot volumes. Also infrastructure inadequate and under pressure from current volumes of traffic which are unsustainable.
Hothersall resident (EAL3 res resp4)	Concerns for employment allocation at Hothersall (EAL3) on grounds of: inappropriate location on minor roads through residential settlements; more appropriate site on primary routes into Longridge;

	highway safety;; increased traffic in addition to developments already approved, disruption from business use of site; increase in vehicle noise (current business already trading what appears to be 24hours with no enforcement); and negative outcomes already identified in SA Appraisal. Jobs created will not be taken by those living in the oversupply of new housing in Longridge.
Hothersall resident (EAL3 res resp 5)	Objection to the employment land allocation at Higher College Farm (EAL3) on grounds of: too close to residential areas; road and local roads not suitable for HGV's and goods vehicles; increased noise and air pollution; site is in AONB and should be promoted for tourism; negative impacts on tourism.
Longridge resident (EAL3 res resp 6)	Objection to the employment land allocation at Higher College Farm (EAL3) on highways and traffic safety grounds. The site entrance is close to an accident blackspot where there has been a fatality. Also the site will generate excessive traffic on local roads and wider network with impacts, including pollution on schools, playgrounds and pedestrian/cycle routes. A59 corridor is preferred location for employment. And reference to DMG1 regarding requirements for highway and access requirements.
Resident (EAL3 res resp 7)	Objection to the employment allocation at Higher College Farm EAL3 on basis of impacts in Grimsargh in relating to: highways infrastructure and traffic congestion; listed Skew Bridge; proximity to primary school and air pollution/health from standing traffic (reference to legislation and recommendations regarding pollution near schools); related health impacts of diesel pollution. More suitable sites available elsewhere, including M6 junction 31a and A59 corridor and need to reduce detriment to heritage, character and beauty of area.
Hothersall resident (EAL3 res resp 8)	Consider the site EAL3 inappropriate for employment development for following reasons: more suitable sites and councils should be working together; not convinced there is a need for more employment sites; it would exacerbate existing traffic congestion in the area; current disturbance from construction sites; surface water flooding issues; unsuitable access; impacts on AONB, biological heritage sites, tourism and walking and cycling routes; previous scheme nearby for rural workshops was considered inappropriate
Resident (EAL3 res resp 9)	Objection to the employment allocation at Higher College Farm EAL3 on basis of: site is located in AONB and tourist area; it is too close to schools and houses; increase in traffic and pollution leading to greater danger; local roads are inadequate for heavy traffic and large vehicles.
Resident (EAL3 res resp 10)	Object to EAL3. Highway and traffic concerns.
Resident (EAL3 res resp 11)	Highway and traffic concerns. No evidence for

	employment land- there is a surplus. Flooding concerns in relation to Longridge.
Resident (EAL3 res resp 12)	Considers there to be little evidence of need for new employment land. Site has poor access. Process has been badly handled.
Resident (EAL3 res resp 13)	Object to EAL3 due to traffic concerns and effect on health and St Michaels Primary school. The Core Strategy highlights A59 as a suitable location for Industry.
Resident (EAL3 res resp 14)	Object to EAL3 due to impact on tourism, AONB and open countryside, traffic, pollution, effect on conservation sites and views from heritage sites. Also consider that there are empty units near motorways and the A59 corridor.
Resident (EAL3 res resp 15)	Object to EAL3. Highway safety concerns. Considers there to be existing units available. Raises concerns over impact on environment (including the AONB), past previous fatalities on the road in this location and impact on nearby school and residential amenity.
Resident (EAL3 res resp 16)	Objection to EAL3. Countryside and highways (congestion and safety) concerns.
Resident (EAL3 res resp 17)	Object to EAL3. Concerns relate to congestion and road safety and the need for large vehicles to pass through residential areas and past schools. Considers that there are existing employment sites more suitable. Concerned with impact on AONB and tourism.
Resident (EAL3 res resp 18)	Objects to EAL3. Considers the evidence to be out of date and unsound. Concerns relate to traffic, the safety of site access impact on public rights of way.
Resident (EAL3 res resp 19)	Object to EAL3. Concerns over impact on BHSs, impact on AONB (views in and out), tourism, traffic (pollution, HGV disturbance, impact on conservation areas and historic villages and congestion, previous fatalities and impact on nearby schools). There are alternative units available and consider that there is no residual requirement for employment land.
Resident (EAL3 res resp 20)	Objects to EAL3. Concerns over impact on pollution, noise, use of greenfield land, impact on rural character, previous accidents on the road, distance from the M6 and the poor road surface quality.
Resident (EAL3 res resp 21)	Object to EAL3. It was not shown in the Core Strategy. If employment land was needed why has this not been earmarked? Longridge has town centre has premises available. Concerns over impact on open countryside, heritage sites, tourism, AONB, traffic, flooding, traffic passing schools, pollution. Appears to be a lack of communication between authorities.
Resident (EAL3 res resp 22)	Object to EAL3. Concerns with traffic, environment (AONB and biological sites) and character on the open countryside. Considers there are sites closer to the motorway. Hothersall was not represented on the Proposals Map at Reg 18.
Resident (EAL3 res resp 23)	Object to EAL3. Concerns over traffic congestion,

	disruption to residents, esp. on route to Motorway. Concern relating to previous fatalities and collisions. Considers that there are alternative sites already available such as Red Scar.
Resident (EAL3 res resp 24)	Objects to EAL3. Concerns over size of development, rural location, out of character and AONB impact. Close to BHS. Concerns over traffic, schools, access to motorway, tourism, previous accidents. Industrial land is available at Red Scar.
Resident (EAL3 res resp 25)	Objects to EAL3. Concerns over use of greenfield land, consider there is no evidence of need/ demand. Empty existing premises in Longridge. Concerns over impact on AONB, traffic, flooding, impact on schools, and pollution.
Resident (EAL3 res resp 26)	Objects to EAL3 on grounds of impacts on: natural beauty; wildlife; appearance; tourism; highways and traffic; pollution and health.
Resident (EAL3 res resp 27)	Comments relate EAL3 and soundness of plan with reference to justified, effectiveness and positively prepared. Question whether the need for the allocation is justified; detrimental impacts on tourism, recreation; concerns about highway safety, traffic and infrastructure issues.
Resident (EAL3 res resp 28)	Objects to EAL3 on grounds of: impacts on AONB and tourism; concerns about height, scale and materials; impacts on surrounding protected sites; highway and traffic impacts; and pollution from HGVs using site.
Resident (EAL3 res resp 29)	Objects to EAL3 on grounds of: proximity to protected heritage woodland, reservoir sites and AONB; impact on tourism, open fields; fear of future expansion; highway and traffic impacts; increased pollution; visual impacts; and other more suitable sites available.
Resident (EAL3 res resp 30)	Objects to EAL3 on grounds of: distribution and manufacturing are inappropriate uses in rural area; highways, traffic, pollution and access concerns. More appropriate sites nearer M6 Junction 31a, M65 and the A59 corridor
EAL3 Ag 1	Objects to EAL3 due to poor site access and in an isolated location away from town centre. Consider there to be more suitable sites in Longridge though do not consider there to be a need/ no evidence base. The Core Strategy highlights the A59 corridor as the most suitable location for employment development. Some confusion between allocation and the application. Concerns over pollution and traffic impact on schools and heritage/ conservation areas. Site is remote from the M6. Site has poor local transport links. Concerns over road safety and previous fatalities. Concerns over impact on AONB.
Brockhall resident (Brok res 1)	Strong support for the allocation of five parcels of land within Brockhall village as open space. The play area, formal gardens and land along Old Langho Road frontage should also be allocated. Suggests additional wording to OS1.

Brockhall resident (Brok res 2)	Support for open spaces in Brockhall village to remain as open spaces for public use.
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In total 138 responses were received to the regulation 19 consultation on the HED DPD.

Section 2: Summary of comments made by private individuals

This section provides an overall general summary of the comments made private individuals.

76 of the responses received were from private individuals. To reiterate, some respondents made more than one point. A significant number of these did not relate their comments to individual specific parts, paragraphs or allocation sites proposed in the HED DPD but instead made descriptive statements of their feelings about a variety of issues.

The comments received are summarised below by theme.

Infrastructure Issues

A number of responses were received concerned with the impact of development on local school pressures, traffic generation/ capacity/access issues, drainage/ flooding issues, and the effect on local wildlife and trees. In many cases these were not directly linked to a specific proposed allocation site, and instead were related to the overall cumulative impact of the level of development that has taken place in the borough over recent years.

Specifically in relation to allocation sites however, responses were received regarding HAL2 (Land at Wilpshire). Comments made relating to this site related mainly to the potential impact of housing development in this location on wildlife on the site and trees. It was stated on more than one occasion that there is an area of ancient woodland on the site. Whilst not designated as 'ancient woodland', Natural England classifies this as deciduous woodland, which is a priority habitat. The impact of development on trees and wildlife, as well as other material planning considerations, would be looked at in detail as part of a planning application for the site, where in a habitat survey would be undertaken.

Concerns over traffic and potential congestion were also raised in relation to this site. There were also requests for the size of the site to be reduced. A number of respondents also raised concerns into relation to existing drainage problems on and adjacent to the site and concerns that development on the site may exacerbate this further.

A handful of respondents also queried why the site had previously been 'safeguarded' but is now being proposed for allocation. It is clear therefore that there has been some confusion surrounding the previous 'safeguarded land' (Policy ENV5) designation in the Districtwide Local Plan (DWLP) with some respondents misunderstanding that this implied the site was protected or safeguarded from development whereas for the lifetime of the DWLP it has been safeguarded for potential future development at such a time when allocations were needed.

In terms of proposed allocations where there are currently no/ minimal utilities on site, this would be rectified as part of the development in the necessary infrastructure provided/

improvements made in consultation with the relevant authorities and providers and would not therefore preclude development.

A significant number of the responses from private individuals related to EAL3 (employment allocation at Higher College Farm). It is apparent that in some instances there has been some confusion between the proposed allocation (EAL3 set out in the HED DPD) and application 3/2017/0317 which is currently being determined by the Council. Where comments have related to both sites, the representation has been forwarded to the Case Officer dealing with the planning application to ensure the comments are taken into consideration in the determination of the application. Many of the issues are applicable to both the application and the proposed allocation EAL3. The most common theme related to the highway/ traffic implications of the development in this location, with particular emphasis on concerns over increased pollution (and the associated potential health implications for local residents), noise and disruption and impact on residential amenity and safety concerns in relation to HGV's on the minor/ country roads and potential impact on the children at the local schools (in terms of pollution, noise and highways safety). Concerns were also raised by individuals about the impact on the nearby AONB (in terms of views in and out), on the Open Countryside and the views from heritage sites and how this may potentially impact upon tourism. It was also stated on numerous occasions that the development of employment land would be best located along the A59 corridor in line with the Core Strategy and that there are currently vacant units available along the M6 motorway which would be more suitable. Concerns were also raised regarding existing business uses.

Use of Greenfield Land & Open Countryside

The development of Greenfield land was raised by a small number of private individuals. Whilst there is a commitment within the Core Strategy to utilise previously developed land where possible, the overall strategic objectives must be met and therefore to ensure development occurs in the locations where a residual development requirement remains, it is necessary for Greenfield land to be utilised. This is an issue considered as part of the accompanying Sustainability Appraisal and the impact of the loss of Greenfield land would also be considered as part of any planning application on the allocation sites.

In relation to Policy EAL3 (Land at Higher College Farm) responses were received which were concerned with industrial development being located in an open countryside location. However, the allocation site sits within the adopted policy framework and is located adjacent to an existing employment use. Any specific development proposals on the proposed allocation site would be considered at planning application stage. Whilst there are existing alternative employment sites available outside of the borough (in Preston/ M6 for example), the Local Plan for Ribble Valley requires that the residual employment land requirement is met.

Proposals Map

A small number of representations were made by private individuals which related to the Proposals Map. There were a number of responses setting out their support for the Map and the revised settlement boundaries however one respondent stated that the presentation

of Proposals Map could be improved as it contained hatching not shown in the key. All illustrative designations shown on the Proposals Map are present in the key. In addition, criticism was also given for not showing development on the Preston side of the Longridge boundary. However, this has not been shown on the Proposals Map as this falls within the borough of Preston City Council and will be shown on their Proposals Map.

As already discussed the question was also posed in the responses as to why the ENV5 designation of allocation site HAL2 had been removed when Greenfield land should be protected. However, the ENV5 designation set out in the Districtwide Local Plan related to 'safeguarded land'; that being land to be safeguarded for possible future development. This designation therefore did not protect Greenfield land from possible future development.

Support for the HED DPD

There was an encouraging amount of support for the detail of the Reg 19 HED DPD received and declarations of considering the plan 'sound' within the responses. There was also support raised for the open space designations presented and the settlement boundary revisions, particularly in Chatburn.

Miscellaneous

There were a small number of comments received that were not related to the HED DPD or a current/ relevant planning application. In these cases it appeared that the consultation letter/ advertising of the HED DPD Regulation 19 consultation had provoked a response to on-going issues from people such as specific householder issues, the cumulative impact of on-going housing developments in the borough, or previous consultations (such as the SHLAA consultation held in 2009 and 2013).

A response was received which stated that there is no definition in the HED DPD of where traveller sites will be located, however the Core Strategy sets out the Councils approach with The HED DPD policy being criteria based.

Council Response

The Council will take all responses received into consideration in preparing the Regulation 22 Submission version of the HED DPD. All representations received at Regulation 19 (Publication stage), which this report deals with, will be submitted to the Planning Inspectorate alongside the Regulation 22 submission version of the HED DPD. This provides the appointed Planning Inspector the opportunity to see all responses in their full, submitted form. The Council will also provide the Inspector with details of the Council's response and whether this has resulted in a focused change, a minor change or no change to the HED DPD. If a change is proposed, this will be reflected within the Regulation 22 Submission version of the HED DPD, will be subject to Sustainability Appraisal testing and further consultation.