

Inspectors initial questions 16/08/17

RVBC response

1. Please can you provide the Council's reasoned commentary on all of the objections, and in particular a more detailed explanation as to the allocations set out in the DPD (the Core Strategy H1 states land for 5,600 dwellings will be made available- Core Strategy DS1 identifies Standen- it that an allocation for the majority of the housing requirement with the DPD making provision for any residual units within the Tier 1 settlement allocations?)

A commentary on all of the objections received at Publication stage (Regulation 19) is attached at appendix 1.

Key Statement H1: Housing Provision (KS:H1) of the adopted Core Strategy (CS) states that '*Land for residential development will be made available to deliver 5,600 dwellings*'. Key Statement DS1: Development Strategy sets out the locational strategy for the spatial distribution of development. In relation to housing, it directs the majority of new development to the strategic site at Standen and the principal settlements of Clitheroe, Longridge and Whalley. A limited amount of development is also directed to the nine Tier 1 settlements which are considered the more sustainable of the 32 defined settlements. Table 4.12 of the CS sets out the numerical distribution of housing in accordance with the adopted development strategy. Appendix 2 of the CS sets out how the housing figure of 5600 has been distributed. Chapter 9 of the adopted Core Strategy identifies the strategic site at Standen for a mix of uses and which would meet a significant proportion of the Borough's overall housing provision in the plan period with a total of 1040 dwellings and provides further detail on this site including how it is central to the delivery of the Core Strategy. It is the only site to be identified in the CS.

Table 4.12 shows that of the total 5600 dwellings to be provided in the CS plan period (2008-2028) 1040 will be directed to the strategic site at Standen. This amounts to just under one fifth of the overall housing provision figure; a significant proportion but not the majority.

Given that CS KS:H1 commits the Council to making land available to deliver the overall requirement, it is a purpose of the HED DPD to provide detail on specific land allocations (as set out at 6.4 of the CS) to meet any outstanding or residual requirements. The starting point is to establish the quantum of outstanding requirement by considering commitments to date in the plan period (i.e. completions since the commencement of the CS plan period, i.e. March 2008 and extant planning permissions). The levels of outstanding/residual requirements in relation to individual settlements are shown in Table 4.12 and these were the starting point for considering allocations in the HED DPD (note: commitments that relate to large housing sites [over 0.4ha] are shown on the submitted Proposals Map as *Committed Housing Sites DS1*).

Regular and more up to date monitoring of the housing position in relation to the residual requirements has taken place. The position which has informed the preparation of the DPD at its various stages and is set out in section 2: Housing Allocations of the submitted Regulation 19 Publication Version of the HED DPD at the justification to Housing Allocation Policy HAL. The Identified Changes to the Regulation 19 Plan (forming one of the submission documents) includes

proposed change DOC1 which seeks to modify the Justification to Policy HAL by updating the residual position as at 31st March 2017. Based on this, there remain outstanding residual requirements in the settlements of Longridge, Mellor and Wilpshire. DOC2 further explains how the residual requirement is met in Longridge and therefore allocations are only made in Mellor and Wilpshire.

2. Please can you provide a list of any relevant planning permissions for housing on the allocated sites, did they benefit from planning permission for housing before the commencement of the current plan in 2008, were they allocated in previous plans?

Neither of the Housing Allocation sites (HAL1 and HAL2) have had planning permission for housing. Neither of the Housing Allocation sites (HAL1 and HAL2) have been previously allocated for residential development prior to the commencement of the current plan in 2008.

A list of planning applications relating to the sites can be found below:

Allocation HAL1: Land at Mellor Lane, Mellor: No previous applications on the allocation site.

Allocation HAL2: Land off Whalley Road, Wilpshire: The only previous application on the allocation site is 3/1991/0501- diversion of an overhead power line. Approved.

The site was defined on the Proposals Map of the former Districtwide Local Plan (DWLP) as “open land” under policy ENV5, which might have been allocated for development in the review or alteration of that plan. Upon adoption of the CS in December 2014, the policies of the DWLP ceased to be part of the development plan for Ribble Valley. Former policy ENV5 was no longer applicable and was not replaced by any specific policy in the CS.

More information on the specific attributes of the allocation sites can be found in the ‘Approach to Plan Preparation document’, which was published at Publication Regulation 19 stage for consultation.

3. Please can you provide position statements on the current progress of any neighbourhood plans in the Borough, including current status, anticipated timetables and details of any housing allocations.

There are two Neighbourhood Plans being progressed in the Borough. The Bolton by Bowland and Gisburn Forest Neighbourhood Plan is the more advanced and has recently been Examined. The Council received the Examiner’s report in late August and, together with the Neighbourhood Planning body, is currently considering it prior to a decision regarding a public referendum.

The second Neighbourhood Plan is being progressed by the Longridge Town Council and has been through a Regulation 14 consultation. The plan making body are currently considering comments on that draft prior to a Regulation 16 Submission consultation. No date for the latter has yet been set. Information on the two plans can be viewed on the Council’s website.

4. Please can you provide an explanation as to why allocations have not been included in the Housing and Economic DPD for gypsy and travellers sites given what is set out in Key Statement H4 of the adopted Core Strategy.

Core Strategy Policy H4 states that the Council will identify as appropriate sites to meet Gypsy and Traveller needs based on the Council's Accommodation Needs Assessment (GTAA). As stated in the policy's explanation the GTAA indicated a low level of need which was considered not to require a formal allocation but rather provision managed through the development management system. Therefore the HED DPD was not considered to require a formal Gypsy and Traveller site allocation.

Following a response within the HED DPD Regulation 18 consultation from the National Federation of Gypsy Liaison Groups (NFGLG), (as explained in the Regulation 19 Publication Version of the HED DPD April 2017 document) it was considered that, while no allocation needed to be made, which the NFGLG appeared to agree with, there was a requirement to place in the HED DPD a policy setting a set of criteria that would help guide the provision of such sites through applications for permission via the development management system mentioned above in H4. These criteria are therefore set out in Traveller Sites Policy TV1.

5. Please can you provide a position statement for the strategic housing and employment allocations to the south of Clitheroe (Standen) and at the Barrow and Samlesbury Enterprise Site/Zone, indicating current status and anticipated timetable.

Standen

The strategic site at Standen is allocated in the CS for development as a mixed use site to include a significant proportion of the Borough's housing requirement (including affordable housing), employment, community uses, local retail and service provision to serve the site, open space and recreational uses.

Outline planning permission (ref: 3/2012/0942) was granted in April 2014 for the erection of 1040 residential dwellings (728 market homes, 312 affordable homes), 0.5ha for local retail, service and community facilities (Classes A1 to A4, B1 and D1), 2.25 ha for employment (Class B1) accommodating up to a maximum gross floorspace of 5,575m², 2.1 ha of land for a primary school site, public open space including green corridors and areas for tree planting and landscaping, an improved (roundabout) junction between Pendle Road the A59, new vehicular, pedestrian and cycle accesses onto Pendle Road and Littlemoor, new pedestrian and cycle accesses onto Worston Old Road, New pedestrian and cycle access from the end of Shays Drive, Roads, sewers, footpaths, cycleways, services and infrastructure including: A sustainable urban drainage system,; New services such as gas, electricity, water and telecommunications).

Further permission was granted in April 2016 (ref: 3/2015/0895) to vary conditions in relation to outline planning permission 3/2012/0642.

Approval of Reserved Matters was given in March 2017 for a phase 1 of development for the erection of 160 market dwellings and 68 affordable units (ref: 3/2016/0324). There has been a

number of subsequent applications in relation to the discharge of conditions which are relevant to phase 1 of the development.

Phase 1 is being pursued by a national developer (Taylor Wimpey) and site preparation and initial development works have now commenced on site. Highway improvements relating to the provision of access from Pendle Road have begun (August 2017). The developer has indicated that phase 1 will be completed by March 2022.

Whilst the scheme in its entirety is intended to be built out in several phases over a number of years, implementation timescales with regards to the allocation for the 2.25 ha of employment land (Class B1) within the Standen site will be built into a later phase of development (accommodating up to a maximum gross floorspace of 5,575m²). A detailed phasing plan that includes the employment aspects within the scheme is yet to be agreed and finalised.

Barrow Enterprise Site

The council is currently engaged in ongoing discussions with developers regarding delivery of the Barrow Enterprise Site, helping to bring development forward as the Borough's principal strategic employment location to support economic growth.

There are several developments already completed at the site. These include the Total Foodservice Solutions Limited building to the west and the Co-Op Food store, petrol station and McDonalds restaurant to the east.

Recently, a parcel of land to the south of the site has received planning permission for two drive through restaurants (use class A3) and two food units (use class A3), along with the provision of car parking and associated landscaping (3/2016/08483). This application was approved at committee in December 2016. This is currently undergoing construction and due to be completed late 2017.

Following this, planning permission for a children's nursery building (3/2016/1168) was approved by committee in February 2017. This is currently undergoing construction and due to be completed by the end of 2017.

A planning application for another children's nursery with associated car parking and landscaping (3/2016/1206) was approved by committee in March 2017, but no development has as yet taken place on this site.

A further planning application has been approved on land to the southwest of the site (3/2016/1033) for the construction of 9 light industrial units (Use Class B1) with associated parking and landscaping, also approved by committee in March 2017. This development is due to begin during 2018.

Samlesbury Enterprise Zone

Developments at the Samlesbury Enterprise Site/Zone are generally working from the A59 southwards. Development works have progressed significantly over the past 12 months. An update on a range of activities is provided below.

The delivery of the site is being done on a phased basis to ensure that at each stage development plots and buildings, along with the necessary infrastructure. The Site Master Plan as a whole takes into account of the positioning and phasing of buildings to be developed, as well as the necessary utilities provisions and highways issues.

Recent developments have included the construction of two new BAE site entrances at locations to the east end of the site (3/2014/1050), which was approved by committee in December 2014. The entrances include a security reception building, gate houses, new road layouts, car parking and pedestrian footways.

Also now completed is the new BAE Academy for Skills and Knowledge Training Centre, car park and new highway works along the spine road leading to the Training Centre and Wincanton Defence Logistics Facility (3/2015/0196). This was approved by committee in May 2015.

As mentioned above the new Wincanton Defence Logistics Centre has also now been completed (3/2015/0558). This Facility handles the storage and distribution of raw materials and aircraft components. The facility has a 130,000ft² footprint with a 35,000ft² first floor operating area, which was built to support BAE Systems production.

Development at the A677 junction on the south side of site has also now been completed and work is currently being finalised which will link the internal spine road to the A59 at the north of the site.

6. The Council's response to the House Builders Federation view that there is no five year supply, the DPD is not flexible and a larger buffer is needed.

The Council's view is that there is a five year supply of deliverable housing sites in accordance with paragraph 47 of NPPF. The latest position is set out in the latest published housing land supply position which has a base date of 31st March 2017. This shows a 5.72 year supply of deliverable sites and supersedes any previous surveys. The next scheduled survey will have a base date of 30th September 2017.

In addition to maintaining a five year supply, the Council is committed to meeting the full housing requirement for the plan period. The position, at 31st March survey shows that in the plan period to date 1770 dwellings have been completed. This leaves a further 3830 to be delivered in the remainder of the plan period to ensure that the overall requirement is met. At 31st March, 3988 dwellings had extant permission, a further 277 were awaiting the completion of a Section 106 Agreement; and allocations are being made in the HED DPD for the residual requirements in Wilpshire and Mellor (about 50 dwellings). In total this amounts to 4325 dwellings, representing a surplus of 495 dwellings or about 9% above the total requirement. The inclusion of a windfall allowance (23 per annum as used in the housing land study) would increase this surplus.

Whilst the HED DPD identifies settlement boundaries and does not seek to make further allocations beyond the strategic site and those shown in the submitted HED DPD, it is incorrect to say that the plan is not flexible. The Council consider, as set out on page 12 of the HED DPD '*Meeting the overall plan requirement*' that in the event of a shortfall in five year supply which is evidenced through the monitoring process, there is sufficient provision in the existing CS policy framework to bring forward additional sites. However there is no shortfall at the time of submitting the HED DDP.

Since there are almost eleven years of the plan period remaining the Council considers that there is realistic prospect of the planned housing requirements being met in the plan period. The Council will keep the position up to date through regular monitoring.

Is the Council's housing requirement a minimum figure?

The Council's housing requirement is treated as a minimum. There are two explicit references to support this in the adopted Core Strategy (CS). Key Statement H1: Housing Provision (KS:H1) states that '*Land for residential development will be made available to deliver 5,600 dwellings, estimated at an average annual completion target of at least 280 dwellings per year over the period 2008-2028 in accordance with baseline information*'. In addition, para. 6.4 states that, "*These figures will be treated as a minimum target unless otherwise determined*".

What is the Council's reasoned consideration on the deliverability of housing supply?

The Council's latest published housing land supply position has a base date of 31st March 2017. This shows a 5.72 year supply. The majority of this is made up of sites with planning permission, both under construction and not started. Sites awaiting the completion of section 106 agreements are included as is a modest allowance for windfall development. A 10% deduction for slippage is made on sites which have not commenced; sites known to be undeliverable or where development has stalled are excluded; and estimates are made of the contribution of large sites in five years based on the best available information from developers/agents/landowners or officer estimates. The five year requirement is based on an annual average requirement of 280 dwellings, calculated using a "Sedgefield" approach and includes a 5% buffer which is added to both the five year requirement and the backlog. The Council keeps matters under review and updates its position on a six monthly basis. The Council considers its approach to be appropriate and that its estimates of five year supply are reasonable and realistic.

Are there any recent appeal decisions (within the last 12 months) in which the Inspector concluded that there was no five year housing land supply (please include the Council's comments on the matter)?

There have been a number of appeals where the Inspector has concluded that the Council does have a five year supply and no recent appeal decisions in the last 12 months in which an Inspector concluded that there was no 5 year supply.

7. How will the DPD achieve the delivery of affordable housing as set out in the Core Strategy Policy H3?

The delivery of affordable housing is a key priority for the Council. Core Strategy Key Statement H3: Affordable Housing (KSH3) sets out the requirements for affordable housing in relation to new housing development. It applies to all applications for new housing that fall within the thresholds of the policy. The two housing allocations which are proposed in the HED DPD fall within the thresholds whereby an element of affordable housing would be sought as developments of 5 or more dwellings (or greater than 0.2 ha irrespective of number of dwellings). The requirement would be for 30% affordable units on the sites in accordance with the details set out in KSH3 and also policy

DMH3: Affordable Housing Criteria. Since these policies are already adopted and form part of the statutory development plan for the Borough, it is not necessary to repeat them in the DPD.

In addition, but outside the scope of the HED DPD, many of the sites with extant planning permission, shown as committed housing sites DS1 on the submitted Proposals Map, include affordable housing.

8. Please can you provide information on the outcome of planning permission ref. 3/2017/0317 and the implication for the employment allocation at Higher College Farm?

Outline planning permission has been granted for application ref: 3/2017/0317 (employment floorspace and associated access, car parking, landscaping and services infrastructure). This was approved at the Councils' Planning and Development Committee on 31st August 2017.

Approval of this site is subject to a number outstanding reserved matters in connection to the consent to ensure satisfactory operational issues and appearance of the site will satisfy the interests of local amenity. The development shall also be designed to ensure that satisfactory highway works are also provided and in accordance with Lancashire County Council requirements as the Highway Authority.

The site lies south of Blackburn Road in Hothersall to the east of Longridge and as this particular location is also proposed as a formal allocation (EAL3) for employment land in the developing Housing and Economic Development DPD (HED DPD), as such it is also considered as being compatible with the relevant Core Strategy policies for employment land. In relation to amount and spatial distribution of employment land, this location has also been tested through the Sustainability Appraisal work associated with the HED DPD. It helps address the residual need for employment land in the Borough. As a part of the HED DPD it has been endorsed as an allocation by the Council.

It is not considered that this will negatively impact upon allocation EAL3. The Council propose to allocate 4ha of employment land within the HED DPD, which is greater than the 2.41ha residual, to allow for an element of choice in sites and locations to accommodate economic growth. It is therefore considered that EAL3 could be developed for an economic development use in addition to 3/2017/0317 and would be in line with the adopted evidence base and Core Strategy.

Core Strategy Policy DMB1- Supporting Business Growth also supports this proposal in principle. DMB1 offers general support for business growth and more specifically states that expansion of existing firms on land outside settlements will be allowed provided that this can be assimilated within the local landscape.

An application for the allocated site (EAL3) is awaiting determination and is scheduled for next Planning and Development Committee (28/09/17) application reference number 3/2017/0602.

9. What is the status of the SA and SEA in the light of the issues raised at the Regulation 19 stage and the query by Natural England regarding the Habitat Regulation Assessment and the explanation of how the conclusion was reached?

In reply to the representations made at Publication Regulation 19 stage, a series of responses to these were made, with input from Arcadis Consulting Ltd (the consultants who produced the Sustainability Appraisal and Strategic Environment Assessment for the Council). This was included within appendix 1 (page 23 - 31) of the Regulation 22 (1) (c) (v) Statement, which was made available for consultation between 31st July and 11th September 2017.

Included within this Reg. 22 (1) (c) (v) document is a response to the representation made by Natural England. It is clear from this that further explanation has now been added to the HRA document in response to the comments made and it is considered that the issues raised by Natural England have now been satisfactorily addressed. The detail of these is repeated below for information purposes.

Natural England stated that the individual allocations were not shown on a plan. As explained in the response to this representation, Natural England were provided with the allocation sites as part of the Regulation 19 consultation. However, for the avoidance of any doubt over how the conclusions have been reached for all the allocation sites in terms of the number of likely significant effects (LSEs), a map of all the allocation sites have been included in Appendix D of the submission version of the report. It is considered that this addresses Natural England's representation.

Natural England also state that they wanted to see more explanation to support the following statement made in the HRA at section 5.2.6 that *'all allocation sites with planning permission [the committed sites] have already gone through the planning process and appropriate mitigation/compensation put in place to ensure no likely significant effects on European sites. All of the allocation sites with planning permission would have been required to adhere to the avoidance/mitigation measures included within the Adopted Core Strategy. This includes key Statement EN4 which provides for ensuring that negative impacts upon biodiversity through development are avoided (refer to section 3.7).* In response to this request for further explanation to be added to the HRA, as can be seen in the Reg 22 (1) (c) (v) document, further explanation has been added to section 5.2 of the HRA and now includes references to information from planning applications to confirm NLSE in European sites. It is considered that this addresses Natural England's representation.

A further representation made by Natural England related to a request for more evidence and explanation to support the conclusion that it is considered unlikely that there would be significant in-combination effects on European sites as a result of the HED DPD allocation sites. In response to this request, additional information has been added to Section 5 to confirm the conclusions of project-level HRAs/consultation with respect to European sites for allocations in the planning system. It is considered that this addresses Natural England's representation.

The final representation raised by Natural England requests that further detail should be provided to explain how impacts can be avoided and/ or mitigated as the HRA places reliance on any effects being identified at a project level HRA. Natural England consider that including further detail on this issue this will give a higher level of confidence that the allocations can be developed without

resulting in Likely Significant Effects (LSE) on European sites and are therefore deliverable. In response to this representation, additional explanation has been added to section 5 to confirm that there would be no LSEs alone or in combination as a result of development of the allocation sites within the Ribble Valley Local Plan. A map showing the locations of the allocations has also been included in Appendix D of the Report (however for the avoidance of doubt, Natural England were sent a map showing the allocation locations on 28th April 2017 as part of the Reg 19 consultation). It is considered that this addresses Natural England's representation.

It is therefore considered that the SA/ SEA and HRA is complete, demonstrates that the HED DPD reflects sustainability objectives and has considered reasonable alternatives. It is also considered that the SEA elements have ensured that the plan has been subject to a process of environmental assessment.

**Appendix 1: Council's commentary on all of the objections received
at Reg 19 stage.**

(See question 1)

Objections received from Developers and Agents

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent – Judith Douglas	Ag 3	Housing Allocations- additional site submitted	NS	NS	Yes	
Summary of issue raised:						
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.						
Council's response:						
<p>Comments noted, however the housing requirement is a strategic issue which, in line with legislation, is determined through the Core Strategy. The consultations and examination of these issues was discussed at length during the formulation of the Core Strategy, which has been found sound through independent examination and subsequently adopted. Therefore, the Core Strategy determines the overall Development Strategy and strategic approach in relation to both levels of housing and economic development in the borough and the HED DPD must be (and RVBC considers that it is) in line with this methodology.</p> <p>5 year supply position does not fall within the scope of the HED DPD.</p> <p>Proposed site is not proposed to be progressed as land is not required for residential development in this settlement (in line with adopted Development Strategy).</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 4	HAL in general	NS	NS	NS	
Summary of issue raised:						
<p>Considers that additional housing land should be allocated in Chatburn and the settlement boundary should therefore be amended to accommodate this. This larger site was put forward at the Reg 18 stage.</p>						
Council's response:						
<p>The Council's Core Strategy, current evidence base and Sustainability Appraisal, taken together with existing permissions, do not indicate that at this stage there is the need for further allocations in Chatburn.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 5	Employment Land allocations- additional site	NS	Unsound	Yes	
Summary of issue raised:						
<p>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.</p>						
Council's response:						
<p>Proposed site is not proposed to be progressed as the site is too large and subsequently not needed to meet the residual employment land need at this stage. It may be considered as a longer term prospect as part of the Local Plan review.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)	
Agent- Dickman Associates Ltd	Ag 7	SA and whole HED DPD	NS	Unsound- not J	Yes
Summary of issue raised:					
<p>Considers that the SA contains errors in relation to the site details for Hammond Ground, Read. Disagrees with tight settlement boundary in Read.</p> <p>It would appear that the SA non-technical summary relates to the previous SA which is an inconsistency in the evidence base and is not justified. Considers that RVBC consultants have not understood the settlement hierarchy in the Core Strategy. Omits Whalley as a main urban area and suggests a target of 100% development on PDL which is implausible.</p> <p>Questions if the background paper is up to date as Appendix A does not mention the Housing White Paper. Appendix B states that Whalley and Sabden are large villages. Arcadis have looked at the 65+ age group and RVBC uses 55+. Also refers to the NE of England and not the NW.</p> <p>Table 2 missing from appendix B. The Lancashire Landscape Strategy is used to assess landscape character, not the Chris Blandford study.</p> <p>Pleased that Read/Simonstone is acknowledges as having good access to a facilities.</p> <p>There is an unfinished sentence in appendix B. Appendix D includes errors and Appendix E is not included.</p> <p>Pleased that appendix D recommends that our clients site at Hammond Ground is a committed site. The site area is incorrect and should be 4.09ha not 20.06ha as stated. The number of units is 50. States that Arcadis has not taken account of the Call for sites that was submitted. They disagree with the results of the SA topic survey.</p> <p>Appendix G does not include a category for 100% affordable if there are less than 100 units.</p>					

Disagree with the tight settlement boundary in this part of Read. Concur with the Settlement Boundary topic paper that MSAs are not an in principle constraint to development.

Considers that the SA contains 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.

Council's response:

Whilst the SA non-technical summary was dated January 2017, and the full SA document dated March 2017, the non-technical summary is based upon the final SA, not the scoping report (or the previous SA as stated by the Agent).

It is not clear to the Council where, in table 5.1 of the Arcadis SA, that the main urban centres are only referred to only as Longridge and Whalley. The CS defines these as Clitheroe, Longridge and Whalley.

The target of 100% pdl in the 'Proposed Monitoring Framework' at table 5.1 reflects the aspirations of the area as set out in the adopted core strategy (and the adopted monitoring framework within this). Where possible pdl is preferable to greenfield land- however it is recognised by the Council that this is not always achievable. This is why the figure of 100% is only a target, which is regularly monitored as part of the AMR.

Appendix A does not make reference to the Housing White Paper: Fixing our Broken Housing Market (Feb 2017) as this is not adopted government policy, however a slight amendment to the document will be made.

Appendix B refers to Whalley as being one of the settlements that is smaller than Clitheroe and Longridge. It does not state that this isn't therefore a Principal Settlement, it merely highlights that it is smaller in scale than these two settlements. It is the Core Strategy which defines the settlement hierarchy (from Principal settlements down to Tier 1 and tier 2 settlements not the HED DPD or the SA of the HED DPD. While this does not materially affect the outcomes of the SA, the terminology can be made more consistent.

It is not made clear by the respondent where they are referring to the SA discussing the 65+ age group instead of the 55+ age group. The 55+ age group is used as the figure to determine older persons housing in relation to the Housing Policies. Whilst not clear where the respondent is referring to, the 65+ age group is not being used in the SA to determine the age category for older persons housing.

Figure B-1 contains a typographical error and will be amended to say NW rather than NE.

Table 2 missing from Appendix B will be amended.

It is not considered that the 'Chris Blandford' study, referred to by the respondent should be referenced in the SA.

The third paragraph following table B-5 in appendix B will be completed. Comments noted.

Appendix E has not been labelled as such and will be amended.

Site area of Hammond Ground -Comments noted. This can be amended to the SA however no amendment necessary to HED DPD as the site is not being progressed through the allocation process as this is not a settlement area where a residual requirement remains. The correct area boundary was used during the SA, however the site area in the SA can be amended. With regards to the challenge of the SA results, St. John the Evangelist Read-in-Whalley Church is approximately 169m to the NE of the proposed development and is a Grade II Listed Building, a water course is adjacent to the south of the proposed development across Whalley Road. The information provided at the call for sites stage has not been made available for the SA. When searching for the planning application (3/2015/0974) this information is also not readily available. Given that the correct site boundary was used in the assessment and only the site area was incorrect. This results in no difference to the assessment given that the change in site area is still above all the possible SA criteria thresholds that relate to site area therefore the results of the SA remain unchanged.

Comments noted relating to Read settlement boundary. The settlement boundary was set according to the criteria set out in the Settlement Boundary Definition Topic paper.

The HED DPD does not alter the overall evidence based housing requirement of 5,600 units. This is set out and determined within the now adopted Core Strategy.

All comments in relation to the SA have been sent to Arcadis for consideration and amendments will be made where appropriate. Comments from Arcadis- The SA NTS is up to date - the changes made in the main SA Report made between January and March did not require changes in the NTS.

Comment regarding main centres noted and can be amended. The target of 100% of new development to be on pdl is taken directly from the AMR 2016 and therefore is considered consistent with the Council's targets.

Page numbers missing from appendix- this is correct. Page numbers not intended.

Does this response give rise to:	Focused change	*	Minor change	✓ (to SA)	No change	*
---	----------------	---	--------------	-----------	-----------	---

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)	
Agent 8	Ag 8		NS/Yes/No	Unsound, J, E	NS/Yes/No
Summary of issue raised:					
<p>Object to HAL2 as not Sound (not Positively Prepared, Justified or Consistent with National Policy) as no reasoned justification for progressing site Wilpshire 3 is given. It is noted that 3.3 of the Summary of Reps of Reg. 18 states that it got most support however the site has never been safeguarded and the DWLP has been superseded by the Core Strategy. Clients have site Wilpshire1. SA shows that Wilpshire 3 has more negative points than Wilpshire 1 and that Wilpshire 3 provides significantly more housing than needed. Wilpshire 1 would not raise any cross boundary concerns with BwDBC. IDP notes some constraints for Wilpshire 3. The choice of Wilpshire 3 is not Justified and not Effective.</p> <p>Considers that RVBC are demonstrating an inconsistent approach by allocating a site that was never safeguarded and exceeds the identified site for Wilpshire but have rejected the sites put forward by us.</p> <p>It would appear that the SA non-technical summary relates to the previous SA which is an inconsistency in the evidence base and is not justified. Considers that RVBC consultants have not understood the settlement hierarchy in the Core Strategy. Omits Whalley as a main urban area and suggests a target of 100% development on PDL which is implausible.</p> <p>Arcadis have looked at the 65+ age group and RVBC uses 55+. Also refers to the NE of England and not the NW. Table 2 missing from appendix B. The Lancashire Landscape Strategy is used to assess landscape character, not the Chris Blandford study.</p> <p>Pleased that Read/Simonstone is acknowledges as having good access to a facilities.</p> <p>There is an unfinished sentence in appendix B. Appendix D includes errors and Appendix E is not included.</p> <p>States that Balderstone is in close proximity to Read and Simonstone.</p> <p>Needs clarification that the 5600 dwellings over the plan period is not a maximum as this is currently misleading.</p>					

Council's response:

The site was originally a safeguarded site in the Districtwide Local Plan (see DWLP Map 8 Inset 31 under DWLP policy ENV5).

SA does in fact indicate that HAL2 is the most sustainable.

Whilst the SA non-technical summary was dated January 2017, and the full SA document dated March 2017, the non-technical summary is based upon the final SA

The Core Strategy acknowledges that the housing figures are not a maximum (para 6.4)

It is not clear to the Council where, in table 5.1 of the Arcadis SA, that the main urban centres are only referred to only as Longridge and Whalley. The CS defines these as Clitheroe, Longridge and Whalley.

The target of 100% pdl in the 'Proposed Monitoring Framework' at table 5.1 reflects the aspirations of the area as set out in the adopted Core Strategy (and the adopted monitoring framework within this). Where possible pdl is preferable to greenfield land - however it is recognised by the Council that this is not always achievable. This is why the figure of 100% is only a target, which is regularly monitored as part of the AMR.

Appendix A does not make reference to the Housing White Paper: Fixing our Broken Housing Market (Feb 2017) as this is not adopted government policy, however a slight amendment will be made to the document.

Appendix B refers to Whalley as being one of the settlements that is smaller than Clitheroe and Longridge. It does not state that this isn't therefore a Principal Settlement, it merely highlights that it is smaller in scale than these two settlements. It is the Core Strategy which defines the settlement hierarchy (from Principal settlements down to Tier 1 and Tier 2 settlements not the HED DPD or the SA of the HED DPD).

It is not made clear by the respondent where they are referring to the SA discussing the 65+ age group instead of the 55+ age group. The 55+ age group is used as the figure to determine older persons housing in relation to the Housing Policies. Whilst not clear where the respondent is referring to, the 65+ age group is not being used in the SA to determine the age category for older persons housing.

Figure B-1 contains a typographical error and will be amended to say NW rather than NE.

Table 2 missing from Appendix B – this will be amended.

It is not considered that the 'Chris Blandford' study, referred to by the respondent should be referenced in the SA.

The third paragraph following table B-5 in appendix B needs to be completed. Comments noted.

Appendix E has not been labelled as such and will be amended.

Site area of Hammond Ground. Comments noted. However, no amendment necessary to HED DPD as the site is not being progressed through the

allocation process as this is not a settlement area where a residual requirement remains.

Comments noted relating to Read settlement boundary. This was set in accordance with the Settlement Boundary Definition Topic Paper criteria.

The HED DPD does not alter the overall evidence based housing requirement of 5,600 units. This is set out and determined within the now adopted Core Strategy.

All comments in relation to the SA have been sent to Arcadis for consideration and amendments made where appropriate.

Comments made by Arcadis- The SA NTS us up to date- the changes made in the main SA Report made between January and March did not require changes in the NTS.

To speculate on the impact that Brexit may or may not have on current EU Directives that are transported into UK legislation and relevant to the SA would be inappropriate given the uncertainty surrounding Britain as it enters into negotiations and prepares to exit the EU. At the time of authoring the report, Britain was a member of the EU and therefore the relevant EU Directives have been taken into account during the SA. It is also anticipated that the Great Repeal Bill will ensure that regulation based on these directives will be maintained at least in the short-term.

Comment regarding main centres noted and can be amended. The target of 100% of new development to be on pdl is taken directly from the AMR 2016 and therefore is considered consistent with the Council's targets.

Appendix B- While this does not materially affect the outcomes of the SA, the terminology can be made more consistent.

Page numbers missing from appendix- this is correct. Page numbers not intended.

There is no reference to Balderstone being in close proximity to Read and Simonstone. Balderstone has been grouped with Mellor and Osbaldeston for the sake of the cumulative assessment of developments given the relative close proximity of these smaller settlements.

Does this response give rise to:	Focused change	*	Minor change	✓ to SA	No change	*
---	----------------	---	--------------	---------	-----------	---

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)	
Agent – Dickman Associates Ltd	Ag 9	Housing Allocations- additional site submitted	NS	NS	NS
Summary of issue raised:					
New site submitted at Langho (land at Petre Farm)					
Council's response:					
<p>Proposed site is not proposed to be progressed as land is not required for residential development in this settlement (in line with adopted Development Strategy).</p> <p>Comments from Arcadis- The SA NTS us up to date- the changes made in the main SA Report made between January and March did not require changes in the NTS.</p>					
Does this response give rise to:	Focused change	*	Minor change	*	No change ✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 10	Promotes a housing site within Clitheroe	NS	NS	NS	
Summary of issue raised:						
Promotes and gives details of a small housing site within the current Clitheroe settlement boundary and suggests it as an allocation.						
Council's response:						
Site noted. The Council are not seeking any allocations within Clitheroe within this consultation. Current need within Clitheroe is being adequately met through extant permissions. Comments from Arcadis- The SA NTS us up to date- the changes made in the main SA Report made between January and March did not require changes in the NTS.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)	
Agent- Dickman Associates Ltd.	Ag 11	SA and whole HED DPD	NS	Unsound- not J	Yes
Summary of issue raised:					
<p>Submits new site at Pages Farm, Clitheroe.</p> <p>Concerns that Arcadis have not read the Core Strategy and that it contains errors and does not state how Brexit will affect EU Directives.</p> <p>Considered that the suggested a target of 100% development on PDL is implausible.</p> <p>There is an unfinished sentence in appendix B. Appendix D includes errors and Appendix E is not included.</p>					
Council's response:					
<p>For clarity, Arcadis have read the Core strategy as they acted as the SA consultants for the production of this SA document too. Whilst the SA non-technical summary was dated January 2017, and the full SA document dated March 2017, the non-technical summary <u>is</u> based upon the final SA, not the scoping report (or the previous SA as stated by the Agent).</p> <p>The target of 100% pdl in the 'Proposed Monitoring Framework' at table 5.1 reflects the aspirations of the area as set out in the adopted core strategy (and the adopted monitoring framework within this). Where possible pdl is preferable to greenfield land- however it is recognised by the Council that this is not always achievable. This is why the figure of 100% is only a target, which is regularly monitored as part of the AMR.</p> <p>It is not considered that Brexit (at this stage) will have any major impact upon the process. It is considered that the requirement for an SA process will in some way form part of British law following the Brexit process. Arcadis will consider this in further detail.</p> <p>The third paragraph following table B-5 in appendix B will be completed.</p>					

Appendix E has not been labelled as such and will be amended.

Proposed site is not proposed to be progressed as land is not required for residential development in this settlement (in line with adopted Development Strategy).

All comments in relation to the SA have been sent to Arcadis for consideration and amendments will be made where appropriate. Comments from Arcadis- The SA NTS us up to date- the changes made in the main SA Report made between January and March did not require changes in the NTS.

Comments made by Arcadis: To speculate on the impact that Brexit may or may not have on current EU Directives that are transported into UK legislation and relevant to the SA would be inappropriate given the uncertainty surrounding Britain as it enters into negotiations and prepares to exit the EU. At the time of authoring the report, Britain was a member of the EU and therefore the relevant EU Directives have been taken into account during the SA. It is also anticipated that the Great Repeal Bill will ensure that regulation based on these directives will be maintained at least in the short-term.

Comment regarding main centres noted and can be amended. The target of 100% of new development to be on pdl is taken directly from the AMR 2016 and therefore is considered consistent with the Council's targets.

Appendix B- While this does not materially affect the outcomes of the SA, the terminology can be made more consistent. Table 2 being absent will be amended.

Reference to NE rather than NW will be amended.

Page numbers missing from appendix- this is correct. Page numbers not intended.

Does this response give rise to:	Focused change	*	Minor change	✓ (to SA)	No change	*
---	----------------	---	--------------	-----------	-----------	---

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)	
Agent	Ag 12	Employment allocations	N/S	N/S	N/S
Summary of issue raised:					
<p>Promotes an employment site on Lincoln Way in Clitheroe as an employment allocation outside and adjacent to the current proposed settlement boundary.</p> <p>Concerns over the accuracy of some of the Sustainability Appraisal documentation:</p> <p>It would appear that the SA non-technical summary relates to the previous SA which is an inconsistency in the evidence base and is not justified. Considers that RVBC consultants have not understood the settlement hierarchy in the Core Strategy (CS). Omits Whalley as a main urban area and suggests a target of 100% development on PDL which is implausible.</p> <p>There is an unfinished sentence in appendix B. Appendix D includes errors and Appendix E is not included.</p>					
Council's response:					
<p>With regard to the site it is considered to be too large in relation to current need at this point. Further consideration would await a full plan review.</p> <p>In relation to Sustainability Appraisal comments:</p> <p>Whilst the SA non-technical summary was dated January 2017, and the full SA document dated March 2017, the non-technical summary <u>is</u> based upon the final SA, not the scoping report (or the previous SA as stated by the Agent).</p> <p>It is not clear to the Council where, in table 5.1 of the Arcadis SA, that the main urban centres are only referred to only as Longridge and</p>					

Whalley. The CS defines these as Clitheroe, Longridge and Whalley.

The target of 100% pdl in the 'Proposed Monitoring Framework' at table 5.1 reflects the aspirations of the area as set out in the adopted Core Strategy (and the adopted monitoring framework within this). Where possible pdl is preferable to greenfield land- however it is recognised by the Council that this is not always achievable. This is why the figure of 100% is only a target, which is regularly monitored as part of the AMR.

Appendix B refers to Whalley as being one of the settlements that is smaller than Clitheroe and Longridge. It does not state that this isn't therefore a Principal Settlement, it merely highlights that it is smaller in scale than these two settlements. It is the Core Strategy which defines the settlement hierarchy (from Principal settlements down to Tier 1 and Tier 2 settlements not the HED DPD or the SA of the HED DPD.

Figure B-1 contains a typographical error and will be amended to say NW rather than NE.

'Table 2' missing from Appendix B - table 2 being absent will be amended.

It is not considered that the 'Chris Blandford' study, referred to by the respondent should be referenced in the SA.

The third paragraph following table B-5 in appendix B will be completed.

Appendix E has not been labelled as such and will be amended.

Comments from Arcadis: To speculate on the impact that Brexit may or may not have on current EU Directives that are transported into UK legislation and relevant to the SA would be inappropriate given the uncertainty surrounding Britain as it enters into negotiations and prepares to exit the EU. At the time of authoring the report, Britain was a member of the EU and therefore the relevant EU Directives have been taken into account during the SA. It is also anticipated that the Great Repeal Bill will ensure that regulation based on these directives will be maintained at least in the short-term.

Comment regarding main centres noted and can be amended. The target of 100% of new development to be on pdl is taken directly from the AMR 2016 and therefore is considered consistent with the Council's targets.

Appendix B- While this does not materially affect the outcomes of the SA, the terminology can be made more consistent.

Page numbers missing from appendix- this is correct. Page numbers not intended.

Does this response give rise to:	Focused change	✓ to SA	Minor change	*	No change	✓
---	----------------	---------	--------------	---	-----------	---

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent – PWA Planning	Ag 13	Policy HAL and Settlement Boundaries	NS	NS	Yes	
Summary of issue raised:						
<p>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 that the respondent considers should be placed within the settlement boundary.</p> <p>(Additional site submitted at Land at The Stables, Chaigley Road)</p>						
Council's response:						
<p>The housing requirement is a strategic issue which, in line with legislation, is determined through the Core Strategy. The consultations and examination of these issues was discussed at length during the formulation of the Core Strategy, which has been found sound through independent examination and subsequently adopted. Therefore, the Core Strategy determines the overall Development Strategy and strategic approach in relation to both levels of housing and economic development in the borough and the HED DPD must be (and RVBC considers that it is) in line with this methodology.</p> <p>RV do not consider it a flawed approach to plan for allocations in those areas where a residual requirement remains and not those areas where the residual requirement has been met as this would be contrary to the adopted Development Strategy.</p> <p>In terms of the anomalies within the settlement boundary topic paper, all sites were visited as part of the review, which in some cases provided a more up to date than the aerial images stated by the respondent.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 14	HAL and settlement boundaries.	Yes	Unsound PP	No	
Summary of issue raised:						
<p>Considers that the HEDPD is only meeting minimum housing requirements and should plan for more.</p> <p>Proposes an additional housing site between Mellor and Mellor Brook north of Mellor Brow road to provide for Mellor's housing need. Feels that the allocated site is too small for the residual need shown in the HEDDPD</p>						
Council's response:						
<p>The Council considers that the allocations proposed are appropriate to the need required taking into consideration the significant amount of permissions already granted in relation to overall expressed need. The Core Strategy makes plain the Council consider that the housing need figure is a minimum one but its regular contact with developers holding current permissions indicates no significant indications of likely under delivery. It keeps current delivery rates under regular review and has a current 5 year housing land supply.</p> <p>The site itself is not adjacent to the Mellor settlement boundary but along a ribbon of single depth housing development that runs between Mellor and Mellor Brook to the west and as such it is not sufficiently well connected to the built form of Mellor to be considered an appropriate site. It is considered that the current allocation will be sufficient for all or the great bulk of the residual housing need and that the remainder, if any, would be met by more appropriately located windfall sites.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent- Hourigan Connolly	Ag 15	Housing	NS	NS	NS	
Summary of issue raised:						
Consider the HED DPD should be allocating additional sites.						
Council's response:						
<p>Comments noted however the housing requirement is a strategic issue which, in line with legislation, is determined through the Core Strategy. The consultations and examination of these issues was discussed at length during the formulation of the Core Strategy, which has been found sound through independent examination and subsequently adopted. Therefore, the Core Strategy determines the overall Development Strategy and strategic approach in relation to both levels of housing and economic development in the borough and the HED DPD must be (and RVBC considers that it is) in line with this methodology.</p> <p>5 year supply position does not fall within the scope of the HED DPD.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)	
Agent	Ag 16	OS 1	N/S	Unsound J,E,CwNP	Yes
Summary of issue raised:					
<p>Supports the fact that the Proposals Map reflect their client's planning permission, shown on the map as a Committed Housing Site on the west of Barrow</p> <p>Objects to the inclusion of allotments within the above housing site as a designated Existing Open Space site as termination notices have been served on the allotment holders and this has been supported by a decision in the Blackburn Magistrates Court in March 2017 which stated that the allotments were not Assets of Community Value.</p> <p>Feels that the soundness of policy OS1 is questionable as the evidence base appears to lack a needs assessment of open space sites in the Borough and is therefore not robust in terms of NPPF para 43 This is assumed to refer to para 73 as NPPF para 43 refers to communication infrastructure.</p> <p>Also suggest amendment to Policy OS1 wording which appears to principally relate to already adopted Core Strategy policy DMB 4</p> <p>Overall the HEDPD is considered to be sound apart from the above comments</p>					
Council's response:					
<p>Support of Committed Housing Site to the west of Barrow noted.</p> <p>Objection to the Existing Open Space within the above site also noted, in light of the evidence supplied the Council will withdraw the site and amend the Proposals Map to reflect this.</p>					

In terms of a robust evidence base within NPPF para 73 no strict formula for robustness is set out in the accompanying Planning Practice Guidance, which concentrates on the effect development proposals may have on existing sites and the need for evidence to underpin any new allocations. DMB4 and OS1 seek, as made clear on the Proposals Maps, to protect already Existing Open Space sites.

The policies do not seek to make any new allocations of open space. OS1 in specific terms extends the protection of existing open space sites within defined settlements shown in already adopted DMB4 to those outside defined settlements.

While the responder, in considering evidence provision, refers to the Open Space and Sports and Recreation Provision Topic Paper (the Topic paper referred to below) there are also other aspects of the evidence base which underpin OS1.

Accompanying the Core Strategy is an additional evidence base document produced by Lancashire Sport Partnership (December 2013), which included a series of specific assessments of current provision of a variety of recreational open spaces, including sports pitches, and an assessment of forward need. This evidence did not, among other matters, indicate any anticipated loss of existing facilities and is used to justify the retention of these existing facilities.

In terms of additional surveys, all the DMB4 designated sites have been surveyed by RVBC planning and sport and recreation staff, using the Open Space topic paper criteria and additional sport pitch assessments. In addition to the above, sports pitches are currently being surveyed within a Council adopted Playing Pitch Audit.

In terms of the new wording the responder suggests the Council does not consider that the proposed new wording adds anything further to the position laid out in both OS1 and DMB4 (to which OS1 directly refers and which it should, as stated in the policy, be read in conjunction with). DMB4 requires assessments before consideration of any change; equivalent or better replacement and loss justified in terms of social, economic or environmental benefits. Viability and practical re-use would also be matters dealt with within the overall assessment present within DMB4.

Does this response give rise to:	Focused change	✓	Minor change	*	No change	*
---	----------------	---	--------------	---	-----------	---

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 17	Settlement Boundary-Billington	NS	NS	NS	
Summary of issue raised:						
Suggests boundary at Dale View, Billington be amended to take potential flood risk into account. Proposed alternative boundary provided to accommodate a partial extension to a site already given planning permission and shown on the Proposals Map as a committed housing site.						
Council's response:						
The relevant planning permission, now shown as a committed housing site on the west of Billington which the settlement boundary runs along for a part of its length, does not lie in a flood zone, which lies slightly further to the north, as can be seen on the Proposals Map for Billington. In addition this representation seeks to extend the current site (and therefore the settlement boundary) further to the west. Billington has no evidenced residual housing need and there is no suggestion that committed housing sites in the area will not deliver therefore no allocation is proposed in this area and the suggested changes are therefore not appropriate.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 18	Housing allocations	NS	NS	No	
Summary of issue raised:						
Promotes a housing site in Copster Green as an additional allocation.						
Council's response:						
The HEDDPD in line with the adopted Core Strategy and its evidence base and also the HEDDPD Sustainability Appraisal does not indicate that Copster Green, as a Tier 2 settlement, is a sustainable location for such a proposed development and as such no allocations are made within the HEDDPD. Recent applications for market housing in this specific area have also been refused; some at appeal, on the same grounds.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent on behalf of developer	Ag19	Housing allocations Section 2	No	Unsound – J, E CwNP and PP	Yes	
Summary of issue raised:						
<p>The HED DPD is not legally compliant because it does not have sufficient regard to the HED DPD evidence base, NPPF and PPG. A vision statement provided by the responder promotes a site to the south of Main St, Gisburn for residential development for up to 53 dwellings to contribute towards meeting housing needs, including affordable housing in the parish. The site is considered to be in a sustainable location; numerous facilities are available within Gisburn, a Tier One settlement and it should be included in the settlement boundary. Its development deliverable in terms of being suitable, available and achievable and will deliver economic, social and environmental benefits.</p>						
Council's response:						
<p>The objector has not elaborated on how the DPD is considered not legally compliant in terms of the evidence base, NPPF and PPG. The Council is not seeking to make further allocations in the Tier One Settlement of Gisburn through the HED DPD. The status of Gisburn as a Tier One Settlement and the limited amount of housing appropriated to it were established through the adopted Core Strategy plan making process. The residual requirement has already been met with committed developments and the settlement boundary amended accordingly.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 21	Housing	NS	NS	NS	
Summary of issue raised:						
<p>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.</p> <p>Have undertaken own SA Scoring. Puts forward a site for housing (HLM land phases 2-4).</p>						
Council's response:						
<p>Draft Proposals Map was amended for Reg 19 consultation by the publication of (and consultation on) the Resultant Changes to the Proposals Map document.</p> <p>Comments noted however the housing requirement is a strategic issue which, in line with legislation, is determined through the Core Strategy. The consultations and examination of these issues was discussed at length during the formulation of the Core Strategy, which has been found sound through independent examination and subsequently adopted. Therefore, the Core Strategy determines the overall Development Strategy and strategic approach in relation to both levels of housing and economic development in the borough and the HED DPD must be (and RVBC considers that it is) in line with this methodology.</p> <p>Proposed submitted site is not proposed to be progressed as land is not required for residential development in this settlement (in line with adopted Development Strategy).</p> <p>Comments made by Arcadis SA- Comments noted. Green Belt is a planning designation where the SA focuses on sustainability issues as a whole. This has considered the qualities of this area albeit whilst not mentioning the planning designation itself.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent on behalf of landowner	Ag 23	Land at Grimbaldeston Farm, Longridge	NS	NS	NS	
Summary of issue raised:						
<p>Part of the site was shown a Reg 18 stage as an employment allocation and the site is currently the subject of an extant appeal and planning application for residential development. The council has resolved to defer and delegate the application for approval. The settlement boundary of Longridge should be amended to include the site subject of the planning application.</p>						
Council's response:						
<p>In accordance with the methodology for revising settlement boundaries the draft Proposals Map shows "committed housing sites" which are generally large sites with planning permission which contribute to the overall housing requirement set out in the adopted Core Strategy. The council will monitor the progress of the current application. At the appropriate time when planning permission is granted (once the section 106 agreement has been completed) the Council will bring forward a change to the Proposals Map, if it is within the plan making time frame. This will propose amendment to the settlement boundary as appropriate to include the anticipated resulting built form of the development and show the committed housing site.</p>						
Does this response give rise to:	Focused change	✓ - at relevant stage	Minor change	*	No change	*

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 24	Committed Housing site at Billington on Proposals Map and associated settlement boundary	NS	NS	NS	
Summary of issue raised:						
Concurs and supports position set out in Ag 17. Does not raise any further points.						
Council's response:						
As per those laid out in Ag 17						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 25	Settlement Boundaries	NS	NS	Yes	
Summary of issue raised:						
Submits a housing site at Copster Green (land South of Albany Drive). This is a resubmission of Reg 18 representations.						
Council's response:						
Proposed site is not proposed to be progressed as land is not required for residential development in this settlement (in line with adopted Development Strategy within the Core Strategy).						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 26	Whole Plan	Yes	Unsound Not pp	Yes	
Summary of issue raised:						
Proposes a housing site in the southern part of Barrow						
Asserts that the HEDDPD only meets the minimum need						
Asserts that all current permissions (Committed Housing sites on the draft Proposals maps) will not deliver as anticipated. And only does “the bare minimum”.						
Feels that it was inappropriate to disaggregate housing figures to individual settlement to arrive at the resultant residual figures.						
Council’s response:						
While the respondent appears to imply that the Council is treating housing numbers as a minimum the Core Strategy, as quoted by the responders themselves elsewhere in their response, does actually state that the figures are minimum (Para 6.4 Core Strategy).						
The Planning Inspectorate specifically instructed the Council to disaggregate overall housing figures to specific settlements within the Core Strategy Examination hearings.						
The significant amount of recent permissions granted in the Barrow settlement and the current housing position in the Borough do not indicate any need for further allocations here.						
Does this response give rise to:	Focused change	x	Minor change	x	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 27	Proposals Map	Yes	Unsound J, CwNP, PP	Yes	
Summary of issue raised:						
<p>The HED DPD is not justified, positively prepared or consistent with national policy in relation to settlement boundary at Mellor Brook in vicinity of Mill Cottage. It is inconsistent with Council's own definition in Settlement Boundary Definition Topic Paper; questions whether the Council's approach to limited release of land (generally and in Mellor Brook) will meet objectively assessed needs in the plan period; and that settlement boundaries should be redrawn in accordance with para.85 of NPPF, which they have not.</p> <p>Further land should be included in Mellor Brook settlement boundary to meet modest housing and/or employment development. This would include the inclusion of land in the vicinity of Mill Cottage and its associated removal from Green Belt, the boundary of which should also be redrawn.</p>						
Council's response:						
<p>The Council is not seeking to make further allocations in the Tier One settlement of Mellor Brook through the DPD and considers that the definition of the boundary is consistent with its methodology. The status of the settlement and the limited amount of housing apportioned to it were established through the Core Strategy Plan making process. The Core Strategy does not envisage any amendments to the Green Belt boundary. The residual requirement for Mellor Brook has been met with committed developments and the settlement boundary amended accordingly. The review of the settlement boundary as part of the HED DPD preparation and the need to meet residual housing requirement for Mellor Brook did not require incursion into the Green Belt.</p>						
Does this response give rise to:	Focused change	x	Minor change	x	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent – JWPC Ltd	Ag 29	Proposals Map-Specifically Hurst Green	Yes	No. Not J, E, PP or CwNP.	Yes	
Summary of issue raised:						
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.						
Council's response:						
Do not consider that there needs to be a specific policy in relation to Stonyhurst College and its estate. Consider that the current settlement boundary approach is consistent with the adopted methodology.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 30	Brockhall settlement boundary	No	Unsound J,E,PP	Yes	
Summary of issue raised:						
Objects to the Brockhall settlement boundary, which is felt should include the land called The Old Zoo on its northern limit, which is considered to represent a viable infill housing site.						
Council's response:						
<p>The settlement boundary around Brockhall was set in compliance with the criteria set out in the relevant Topic Paper, in this case around the built form of the settlement. The Old Zoo is a large private landscaped setting for an individual residence. The site is almost totally landscaped and does not present any obvious connection to the bulk of the built form of the actual settlement to its south, where the settlement boundary is set. As such the Council does not agree to this change.</p> <p>In addition it appears that the justification for the change would be to draw the site into the settlement with the purpose of creating an infill housing site. It is not the purpose of settlement boundaries to be drawn to deliberately create infill sites, though the criteria, if followed, might logically create opportunities to round off etc. However this is not the case in this instance.</p> <p>Also the adopted Core Strategy (Policy DS1) does not indicate any housing need in Brockhall, a Tier 2 settlement with low sustainability and therefore no allocations are proposed.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent	Ag 31	Proposals map	Yes	Unsound J	Yes	
Summary of issue raised:						
<p>Plan is unsound, not justified, in relation to the settlement boundary at Osbaldeston. The definition of the boundary is inconsistent with the methodology set out in the Council's Settlement Boundary Definition Topic Paper in relation to all properties physically linked to the main part of the settlement. The boundary should be extended along Osbaldeston Lane which would provide for very limited infill which would ensure future viability of the settlement.</p>						
Council's response:						
<p>The Council consider that the definition of the boundary is consistent with its methodology. Osbaldeston is identified as a Tier Two settlement in the adopted Core Strategy as a "less sustainable" settlement. As such, the Core Strategy does not apportion any development to the settlement. There is no case on this basis to amend the settlement boundary.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent on behalf of developer	Ag 32	EAL 3	NS	Unsound J, CwNP, E & PP	Yes	
Summary of issue raised:						
<p>The representation supports the allocation of the Employment Allocations Option Site 3 which was identified by the Council at regulation 18 stage by the Council. It is not pursued in the Regulation 19 plan and has been replaced by the adjacent smaller site EAL 3 at Higher College Farm. There is support generally for making employment allocations in the vicinity but objections are made that the Council's approach to employment land is unsound in relation to: seeking to provide minimum requirements only; the contribution of certain committed sites; the locational distribution; and under-provision of employment development in Longridge.</p> <p>EAL 3 is considered insufficient to meet needs of Longridge and its allocation is considered not justified, effect nor positively prepared and therefore not sound. It is under-sized, unsuitable and unlikely to be achieved.</p> <p>The allocation at EAL3 should be deleted and replaced by the allocation of the 2.2 ha referred to at the Reg 18 stage as Employment Allocation Option Site 3 which is considered available, suitable, achievable and deliverable as demonstrated by a current planning application (ref: 3/2017/0317)</p>						
Council's response:						
<p>Employment allocation EAL3 has been considered and included as the Council's preferred site following the Regulation 18 consultation and Call for Sites exercise. It is included as the preferred site as it consolidates development in front of the existing employment site and will also serve to mitigate concern regarding the overall scale of development in the location.</p>						
Does this response give rise to:	Focused change	×	Minor change	×	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Agent on behalf of agent/landowner	Ag 33	Settlement Boundary/ Proposals Map	NS	NS	NS	
Summary of issue raised:						
<p>The representation promotes a site at Wiswell Lane, Whalley for allocation for residential development which is considered in accordance with the Core Strategy and involves expanding a Principal Settlement. It is considered suitable, available and deliverable. The extended settlement boundary is considered logical being defined by adjacent roads.</p> <p>The site should be identified as falling within the area identified under Key Statement DS1: Development Strategy and the settlement boundary of Whalley should be amended accordingly to incorporate the allocation.</p>						
Council's response:						
<p>The Core Strategy determines the overall Development Strategy, and the amount and locational distribution of housing development in the borough. The HED DPD seeks to ensure that this provision is met through the allocation of sufficient land. The settlement boundaries have been reviewed to take account of existing development commitments. In the case of Whalley, existing commitments will more than meet the housing requirement for the settlement in the plan period and therefore it is not necessary to make further allocations in this plan period. There is no requirement to further alter the settlement boundary at this stage.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Developer	Devpr 1	Settlement Boundary in Longridge and Housing supply	NS	NS	NS	
Summary of issue raised:						
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 Settlement Boundary be altered and site at Higher Road Longridge should be allocated for housing.						
Council's response:						
<p>Comments noted however the housing requirement is a strategic issue which, in line with legislation, is determined through the Core Strategy. The consultations and examination of these issues was discussed at length during the formulation of the Core Strategy, which has been found sound through independent examination and subsequently adopted. Therefore, the Core Strategy determines the overall Development Strategy and strategic approach in relation to both levels of housing and economic development in the borough and the HED DPD must be (and RVBC considers that it is) in line with this methodology.</p> <p>The five year supply is a separate issue and is not something that is determined within the HED DPD.</p> <p>Settlement Boundary at Higher Road Longridge will not be amended to allocate land for housing as this would be contrary to the overall adopted Development Strategy and against the Settlement Boundary Definition methodology.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Developer	Devpr 2	General housing provision issues	NS/Yes/No	Unsound. J,E,CWNP,PP	NS	
Summary of issue raised:						
<p>Objection on the grounds of: Need to include the whole of the council's evidence base within the Reg 19 consultation. Also need to update the SHMA, housing land provision and housing need requirement. Also concerned that the overall housing figure is considered as a maximum. Also asserts that there has been under delivery, including the Standen strategic site and therefore the need to allocate further sites beyond those in the HEDDPD. Also as a part of the overall housing question the need to deliver affordable housing and housing in Longridge where further allocations are needed.</p> <p>In addition the respondent also asserts that the Longridge settlement boundary should be amended to take into account the full extent of the planning permission east of Chipping Road.</p>						
Council's response:						
<p>Comments noted, however the housing requirement is a strategic issue which, in line with legislation, is determined through the Core Strategy. The consultations and examination of these issues was discussed at length during the formulation of the Core Strategy, which has been found sound through independent examination and subsequently adopted. Therefore, the Core Strategy determines the overall Development Strategy and strategic approach in relation to both levels of housing and economic development in the borough and the HED DPD must be (and RVBC considers that it is) in line with this methodology. The Council regularly updates its housing availability and is confident in the deliverability of its permitted sites. It also considers that its evidence base, including the SHMA and others are up to date and it is committed to keeping them under regular review.</p> <p>In terms of the settlement boundary the boundary takes into account the approved development limit of the permission, consistent with the settlement boundary criteria linking the settlement boundary to the limits of the built form.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Developer	Devpr 3	Whole plan	NS	Unsound- not PP	Yes	
Summary of issue raised:						
<p>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.</p> <p>Advocate a site at Hawthorne Farm in Clitheroe.</p>						
Council's response:						
<p>Comments noted however the housing requirement is a strategic issue which, in line with legislation, is determined through the Core Strategy. The consultations and examination of these issues was discussed at length during the formulation of the Core Strategy, which has been found sound through independent examination and subsequently adopted. Therefore, the Core Strategy determines the overall Development Strategy and strategic approach in relation to both levels of housing and economic development in the borough and the HED DPD must be (and RVBC considers that it is) in line with this methodology.</p> <p>Proposed site is not proposed to be progressed as land is not required for residential development in this settlement (in line with adopted Development Strategy).</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Developer	Devpr 4	General housing matters	NS	NS	NS	
Summary of issue raised:						
<p>Considers that the HEDDPD lacks flexibility with only a small number of allocations. Does not agree with 5 year supply methodology and believes that a Full Review should be undertaken promptly.</p>						
Council's response:						
<p>Comments noted however the housing requirement is a strategic issue which, in line with legislation, is determined through the Core Strategy. The consultations and examination of these issues was discussed at length during the formulation of the Core Strategy, which has been found sound through independent examination and subsequently adopted. Therefore, the Core Strategy determines the overall Development Strategy and strategic approach in relation to both levels of housing and economic development in the borough and the HED DPD and its allocations must be (and RVBC considers that it is) in line with this methodology.</p> <p>The Council considers that its 5 year supply methodology is sound.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Home Builders Federation	HBF	All plan	N/S	N/S	N/S	
Summary of issue raised:						
<p>Objects to housing policy position not to any of the specific allocations in the HED DPD. Feels that policy should deliberately allocate more sites over the Core Strategy housing figure to ensure that the minimum housing requirement figure is achieved. Lack of flexibility. Stated buffer of anticipated supply is not considered adequate to deal with and potential under delivery on existing permissions. Considers that a 20% buffer is needed</p> <p>Feels that the government wants to introduce a delivery test and therefore it would be prudent for the council to increase its buffer by presumably granting more permissions.</p> <p>20% buffer is needed.</p> <p>Questions ability of Council to demonstrate a five year supply as its methodology is flawed while admitting that the HBF has not performed a thorough assessment.</p>						
Council's response:						
<p>The Council has performed a thorough assessment of its five year supply position and regularly keeps this under review. The Council can demonstrate a current 5 year housing land supply. While appreciating that the responder has related their comments in part to the housing land published position of October 2016 the Council has subsequently updated its housing land position to end March 2017.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)	
V H Land Partnerships Ltd	VH1	Settlement boundary around Longridge	No	Unsound: Not J, not CwNP, not PP.	Yes – if necessary to make our case for the lack of a 5 year supply
Summary of issue raised:					
<p>Whole DPD</p> <ul style="list-style-type: none"> • Q6: The council does not currently have a 5 year housing supply, therefore it is not in a position to proceed to adopt the DPD. • Q7: Allocate additional sites to provide a 5 year supply such as Higher Road, Longridge. Even if the council did have a 5 year supply, it could only be considered, at best marginal. The council is not building in a sufficient 'buffer' in its planning strategy for new housing and will inevitably find it difficult to guarantee a robust supply and ensure choice in the housing market. Reference to the Officer report to P&D Committee on planning application 3/2016/1082 which discusses a marginal supply positions in the latest monitoring figures. Letter attached addressed to Mrs J Macholc dated 3 April 2017 ref: VHLP/778/2194/GH (RV ref: 3/2016/1082) <p>Section 2 Housing Allocations (all paragraphs):</p> <ul style="list-style-type: none"> • Q6: The DPD has failed to recognise a logical revision to the Longridge Settlement Boundary to include an area of land to the S of Higher Rd and N of the Taylor Wimpey development (land n of Dilworth Lane). The land is surrounded by development on 3 sides. Longridge is a principal settlement and the inclusion of land within the settlement boundary has been considered sustainable by RVBC planning officers. Further Land at Higher Rd Longridge should be considered as a proposed housing allocation for the same reason. • Q7: Amend the Longridge settlement boundary to include the area to the south of Higher Rd & N of the Taylor Wimpey site (N of Dilworth Lane) and include the same area as a proposed housing allocation in the HED DPD section 2 Housing Allocations. • Q9: The DPD needs to make additional allocations to ensure the continuing need in RV is met and also to make our case to the lack of a 5 year supply. Specifically we proposed that land at Higher Road Longridge (app 3/2016/1082) is allocated for housing. 					
Council's response:					

Whole DPD

- **Q6:** RVBC considers it does have a 5 year supply of housing. Notwithstanding this, the Council does not need a 5 year supply to produce the DPD.
- **Q7:** No additional sites are needed to provide a 5 year supply. RVBC has a 5 year supply. It is not considered marginal based on the most up to date HLA monitoring. The site at Higher Road, Longridge (3/2016/1082) was refused at Planning Committee in early 2017.

Section 2 Housing Allocations (all paragraphs)

- **Q6:** The site at Higher Road, Longridge does not satisfy the criteria based approach applied in reassessing the settlement boundaries.
- **Q7 & Q9:** RVBC do not consider that the Higher Road, Longridge site is required as an allocation. Evidence suggests that there is minimal residual housing in Longridge and therefore no allocations necessary in this location.

Does this response give rise to:	Focused change	*	Minor change	*	No change	✓
---	----------------	---	--------------	---	-----------	---

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Objections received from interest groups and other organisations

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Interest Group- CPRE	CPRE	Whole Plan and HAL1 and HAL2	NS	NS	NS	
Summary of issue raised:						
<p>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.</p>						
Council's response:						
<p>The HED DPD is not planning for a 'reduced number of homes'. The detail of DS1 does not need to be reiterated within the HEDDPD as (as a daughter document) it is not intended/ necessary to repeat existing adopted policy. DS1 is included on page 6 of the HED DPD however.</p> <p>Planning applications would be assessed in detail for HAL1 and HAL2 to ensure all facets such as open space, trees, flood risk and economy for example are considered.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Action Group (No Industrial Site for Hothersall)	EAL 3 Ag 1	EAL 3	NS	NS	NS	
Summary of issue raised:						
Objects to EAL 3 on the grounds of : <ul style="list-style-type: none"> • Isolated location with poor site access • No need for this allocation and better sites available in Longridge. A59 a better location • Traffic and road safety concerns • Effect on local environment and heritage and impact on AONB. 						
Council's response:						
<p>The site is well located in relation to Longridge being within 500 m of the settlement boundary. The Council is advised by the local Highway Authority that they have no 'in-principle' objection to this allocation. Detailed issues such as safe access would be a matter for any subsequent planning application, at which time the Highway Authority would be re-consulted. Longridge is a location mentioned in the Core Strategy as a location for employment land in addition to the A 59 corridor. Council's evidence base (2013 Employment Land Review) indicates that there is a need for employment land in the town and planning legislation tasks the Council with allocation sites to address its evidenced needs. The Sustainability Appraisal judges this site to be the most suitable in the area.</p> <p>In terms of effects on the local environment and heritage, while the site is not in the AONB relevant consultees have not raised any in principle concerns over this allocation. Detailed site based issues in relation to layout, landscaping etc would be a matter for a subsequent planning application. There are no formally designated nature conservation sites within the allocation boundary.</p>						
Does this response give rise to:	Focused change	×	Minor change	×	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)	
Sport England	Spen 1	OS1	NS	Unsound on evidence base	NS
Summary of issue raised:					
<p>Welcome the extra clarity provided by OS1 and recommend a series of amendments to the wording of OS 1. This proposes a change to the last sentence of OS1 para 1 to now read:</p> <p>“This will include private playing fields which are <u>currently</u> in recreational <u>or sporting</u> use, <u>or were last used for sport or recreation.</u>” (added wording is underlined.)</p> <p>The responder also feels that there is a confusion as to the meaning of “robust assessment” in OS1 para 2. Considers that for clarity further wording be added to OS1 para 2 The relevant sentence should now read:</p> <p>“As set out within DMB 4, in exceptional circumstances, and following a robust assessment, where the loss of a site is justifiable because of the social and economic benefits a proposed development would bring to the community, consent may be granted where suitable replacement facilities are provided <u>on a like for like or better than basis,</u> or where existing facilities elsewhere in the vicinity are substantially upgraded to the satisfaction of the Local Planning Authority. (additional text underlined)</p> <p>The responder feels that bullets 1 and 3 within NPPF para 74 are not addressed.</p> <p>Suggests that monitoring of the amended policy should take place.</p> <p>Makes evidence base comments.</p> <p>The responder feels that the Lancashire Sport Partnership Review (December 2013), which is a part of the evidence underpinning both DMB4</p>					

and OS1 is limited and suggests that it is not a true empirical representation of supply and demand and feels that it is fully robust enough to execute OS1.

Feels that the Sport and Recreation Provision Topic paper's references to the supersede PPG 17 Companion Paper is erroneous.

Responder wishes to know more detail about the Playing Pitch Strategy (PPS) mentioned in 3.5.1 of the Topic paper and its connection to the Playing Pitch Audit in Topic Paper 3.6. Audit date is mentioned as 2015. Feels that Strategy production is slow, wishes Audit to be published alongside other parts of evidence base.

Criticises 3.11 of Topic Paper relating to Lancashire Sport Partnership information on indoor sport and recreation facilities as being "purely a desk based assessment using Sport England tools" and "not fully holistic".

Council's response:

The Council consider that the amended wordings above proposed are appropriate and will amend the policy thus.

The Council consider that there is no confusion or ambiguity in the phrase "robust assessment" which is directly taken from NPPF para 73 and which is not further defined within Planning Practice Guidance.

Core Strategy policy DMB 4 to which OS1 relates, was found sound in the Core Strategy Examination as being NPPF compliant. OS1 seeks to extend the protections within DMB4 to Open Space sites outside the defined settlements.

The Council considers that the two NPPF bullet points are addressed within current policy in terms of a robust assessment indicating surplus provision (current evidence suggests that there is none). Within DMB4 or within the consideration of any planning application that may come forward using wider Core Strategy policies.

The Council would monitor all policies within its AMR.

In response to the responder's evidence base comments:

The Council feels that the Lancashire Sport Partnership document remains an robust and adequate evidence base document and was found to be fully NPPF compliant in the Examination of the Core Strategy and within it DMB4. As such DMB4 is considered fully operable and therefore so is OS1 which carries forward DMB4 protections to sites outside defined settlements.

The references to PPG17 in the Topic Paper are not erroneous. Page 2 of the Topic Paper specifically refers to PPG17 policy as now superseded by NPPF. The principal reference to PPG17 is through the typology of the various kinds of open space which were felt to be a useful and pragmatic breakdown of a relatively complex set of space. Planning Practice Guidance does not provide a detailed definition of Open Space or a set methodology in assessing it. It also refers to (Topic paper page 3) Sport England being contacted in the development of the Paper and stating that their role was limited to formal sports provision assessment and not other aspects of Open Space. As such comments on the evidence base in this response are taken to solely relate to sports aspects of Open Space and not other elements. With specific relation to the sports aspects of open space attention is therefore drawn back to the Lancashire Sport Partnership evidence mentioned above that has been found sound within the Core Strategy Examination.

The Council's evidence base also contains a full quantitative and also an independently produced qualitative Audit of its cricket, football and rugby pitches to an approved methodology. This will form a part of the overall Playing Pitch Strategy (PPS) referred to in the Topic Paper. Work on the PPS has already begun through initial stakeholder meetings but as yet no terminal date has been set for its production.

In relation to the further comments on section 3.11 of the Topic Paper the Council re- iterates its position that the Lancashire Sport Partnership evidence is up to date and has been found sound after a full Examination by the Planning Inspectorate.

Does this response give rise to:	Focused change	✓	Minor change	✘	No change	✘ or ✓
---	----------------	---	--------------	---	-----------	--------

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Objections from Specific Consultees

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Blackburn with Darwen Borough Council	Blackburn with Darwen BC	Policy HAL2	Yes	Yes- Sound	No	
Summary of issue raised:						
<p>Respondent raises point that there is a significant level of residential development allocated on the BwD side of the border between BwD and RV (totalling 755 units) which they consider will have significant consequences for the highway network which have (or will be) subject to Transport Assessments. As the highway authority for its area, BwD is ensuring that assessments are undertaken relating to sites within its boundary, but consider it also essential that the same occurs in relation to the sites which are on the same part of the network but for which LCC is the highway authority. Therefore BwD wish to see:</p> <ul style="list-style-type: none"> • A statement in relation to Allocation HAL2 that any transport assessments considering the development of the site must align with assessments already undertaken in relation to the Parsonage Road, North Blackburn and Roe Lee sites in BwD in terms of assumptions regarding planned and committed development traffic generation and network impact. • BwD as highway authority must be consulted at scoping stage in relation to any Transport Assessment concerning Allocation HAL2. <p>The respondent also states that they note the format of the DPD does not include for any site-specific DM considerations, and so we believe that the most appropriate place for the above statements to be included would be in the IDP. We would expect users of the DPD and Core Strategy to refer to the IDP as necessary in determining how to apply the generic DM policies to a site-specific situation.</p>						
Council's response:						
Comments noted. A minor change has been made to the Infrastructure Delivery Plan to address the comments raised.						
Does this response give rise to:	Focused change	*	Minor change	✓	No change	*

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Hothersall Parish Council	Hoth PC 1	EAL 3	NS	Stated as unsound	NS	
<p>EAL 3 objected to on the grounds of over allocation in relation to need due to recent approvals in the area; site not deliverable; traffic impact, impact on local character and environment including the AONB and Biological heritage sites and flooding concerns.</p>						
<p>Councils response</p> <p>The Highway Authority advise the Council that it has no in principle objection to the site. Assessment of the site and contact with the landowner indicates that the site is deliverable. The Sustainability Appraisal also indicates that the site is a sustainable one.</p> <p>While there have been employment land planning permissions in the general area, including sites in nearby Preston City Council's area, Ribble Valley has to allocate land to address its local needs. Windfall provision in relation to employment land is not considered to be reliable enough in the Longridge area that is within Ribble Valley.</p> <p>The Sustainability Appraisal indicates that there will be no significant impacts on the nearby AONB or the BHS sites. Relevant consultees have also raised no in principal objection.</p> <p>The Environment Agency and the Lead Local Flood Authority have raised no objection to the site in terms of flooding issues. A full Flood Risk Assessment (FRA) would be carried out as a part of any subsequent planning application.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Longridge Town Council	Long TC	Not clear generally relating to employment issues	NS	NS	NS	
Summary of issue raised:						
Considers that the HEDPD removes two of the “original” employment sites and regrets this. Feels also that the Core Strategy should have an Employment Strategy within it.						
Council’s response:						
<p>The reference to two original sites may be to earlier sites that were screened through the Regulation 18 and the Sustainability Appraisal. The proposed allocation for the Longridge area has taken all the tests of suitability and compared them to local need to result in the proposed allocation. The need for future employment land will be kept under review alongside other strands of evidence.</p> <p>The Core Strategy and its employment policies were informed by the Council’s Economic Strategy.</p>						
Does this response give rise to:	Focused change	×	Minor change	×	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Specific consultee	Mellor Parish Council	HAL1	NS	NS	NS	
Summary of issue raised:						
Objects to HAL1 on the grounds of potential road drain flooding.						
Council's response:						
Noted. The potential impacts of flooding would be considered in detail as part of a planning application, where specific details such as site layout would be known.						
Does this response give rise to:	Focused change	×	Minor change	×	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Natural England	Nat Eng 1	Not the HED DPD. Related to the HRA.	NS	NS	NS	
Summary of issue raised:						
Make specific reference to HRA and seeks more information and explanation of how the conclusions has been reached. Need to be sure that there are no alone or in-combination effects on the European Sites identified and any other plans and programmes.						
Council's response:						
<p>Comments forwarded to Arcadis. Table 8 and table 7 (where required) can be updated to include more detail about the individual sites. A map showing the locations of the allocations will also be included in Appendix D in the next iteration of the report (note a map showing the locations of the allocations was sent to NE on 28th April 2017).</p> <p>Further explanation can be added to section 5.2 of the HRA. This would include references to information from planning applications to confirm NLSE on European sites. Further explanation can also be added to section 5 of the HRA to confirm the conclusion of project-level HRAs/ consultation with respect to European sites for allocations in the planning system.</p> <p>Further explanation can be added to section 5 of the HRA to confirm that there would be NLSE alone, or in combination as a result of development of the allocation sites within the Ribble Valley Local Plan. A map showing the locations of the allocations can also be included in Appendix D in the next iteration of the report (note a map showing the locations of the allocations was sent to NE on 28th April 2017).</p> <p>No changes to the HED DPD.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Ribchester Parish Council	Rib PC1	EAL 3	NS	Stated as unsound	NS	
Summary of issue raised:						
Objects to EAL 3 on the grounds of highways impacts, visual and environmental impacts, possible pollution of watercourses.						
Council's response:						
The Council are advised by the Highways Authority that they have no objection to the site in principle. Detailed access issues would be one of the issues that would be considered at a subsequent planning application.						
The Sustainability Appraisal and relevant consultees have not raised any in-principle objections in relation to wider landscape impacts.						
Does this response give rise to:	Focused change	x	Minor change	x	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Whittingham Parish Council	Whit PC1	Duty to co-operate and EAL3	NS	NS	NS	
Summary of issue raised:						
<p>Concerns about impact of growth in Preston on Whittingham. Insufficient consultation between Ribble Valley, Preston City Council and the Parish Council. Concerned to ensure local roads and infrastructure will be improved rather than contributions being spent county wide. The PC would like to see a masterplan showing development sites, infrastructure improvements and preferred access.</p> <p>Objection to Higher College Farm allocation (EAL3) due to major traffic impact on Whittingham area.</p>						
Council's response:						
<p>RVBC consider it has satisfied its Duty to Co-operate. Meetings and correspondence with Preston CC and surrounding Parish Council's have been on-going during the development of both the now adopted Core Strategy and the HED DPD.</p> <p>A specific plan would be consulted upon as part of any planning application for the EAL3 site, of which the traffic impact on the area would be considered, and Highways will be consulted again at that stage.</p>						
Does this response give rise to:	Focused change	×	Minor change	×	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Wilpshire Parish Council	Wilp PC	HAL 2	NS	NS	NS	
Summary of issue raised:						
<p>Does not reject HAL 2 but rather comments that its southern boundary be redrawn further north to protect the woodland on the southern fringe.</p> <p>Also comments that the site's access is poor, that development should, if it occurs, not rise above the skyline and that development quantity be related to local housing evidence.</p>						
Council's response:						
<p>The Council accepts that it would be appropriate to redraw the southern boundary of the HAL 2 site to the north to protect the woodland and has proposed this as a modification to the draft Proposals Map.</p> <p>In terms of access the Council are advised by the Highways Authority that they have no objection to HAL 2 on highways grounds.</p> <p>Actual design of future development on the HAL 2 site, including relationships to the skyline, would be dealt with at any subsequent planning application stage.</p> <p>The HEDPD allocations are all related to current residual housing needs in the relevant areas. The Council will keep housing need evidence under review and should this indicate additional need in Wilpshire, the HAL2 site would be able to accommodate it as the availability of other sites is very constrained.</p>						
Does this response give rise to:	Focused change	✓	Minor change	*	No change	*

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Objections received from Private Individuals

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private Individual	3017 objector	EAL3	NS	NS	NS	
Summary of issue raised:						
<p>Wish to lodge objection to above planning application on grounds of health and safety. The stretch of highway where the site entrance would be is one of the most dangerous in the area and most hazardous in Lancashire.</p> <p>Local infrastructure is already congested and this would increase heavy goods vehicles on the roads, add to congestion and damage road surface.</p>						
Council's response:						
<p>LCC have not raised any highway concerns. Infrastructure concerns are considered within the Infrastructure Delivery Plan.</p> <p>Comments have also been passed on to the Case Officer dealing with application 3/20173017.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	Clith res 1	General comments	NS	NS	NS	
Summary of issue raised:						
<p>Concern as stated is with the Council granting permission for a site for housing at Waddow View in Clitheroe. This site is marked as a committed housing site on the draft Proposals Map. Responder feels that this was unjustified in terms of its impact on: local wildlife, impact on local views, traffic generation and pollution, feeling that new residents will just be commuters</p>						
Council's response:						
<p>Comments noted. A legally valid planning permission has already been granted on the site.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	Clith res 2	NS	NS	NS	NS	
Summary of issue raised:						
Feels that, due to poor access, there should be no further development in part of Clitheroe to the west of the railway line until better access supplied.						
Council's response:						
Comments noted. No development in Clitheroe proposed as part of the HED DPD.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	Clith res 3		NS	NS	NS	
Summary of issue raised:						
Relates to Clitheroe town centre and part of western settlement boundary which is felt to be drawn too tightly and should be relaxed to allow for future development.						
Council's response:						
The boundaries are drawn consistent with the settlement boundary criteria, which have applied across all the area's settlements. No allocation is proposed for Clitheroe as evidenced need has been supplied through planning permissions. The Council are required within the Core Strategy to review overall housing numbers within five years from the adoption of the strategy and, should this indicate additional need, further allocations may be required.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	Clith res 4	Settlement Boundary	NS	NS	NS	
Summary of issue raised:						
Settlement boundary should be amended to take account of dwelling under construction adjacent to the Black Horse Inn at Pimlico.						
Council's response:						
Council accepts that the extant planning permission mentioned by the responder exists and therefore that a focused change in the Clitheroe settlement boundary should be made to accommodate it by bringing it within the settlement boundary. The Proposals map has been amended to reflect this.						
Does this response give rise to:	Focused change	✓	Minor change	*	No change	*

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Resident	EAL3 res resp 2	EAL3	NS	NS	NS	
Summary of issue raised:						
<p>Objection to the development of the employment site EAL3 on grounds of: increased traffic; use of green field sites in preference to brownfield; lack of utilities; and visual impact on tourist area. Respondent also questions whether 24 hour traffic and working will be allowed.</p>						
Council's response:						
<p>No issues have been raised to date by the Highway Authority (LCC) or utility and infrastructure providers in relation to traffic, highways and access issues or utilities and infrastructure which would preclude the development of the site. The proposed allocation of the site has taken account of the Sustainability Appraisal process. Detailed matters will be considered at the planning application stage including access, infrastructure and visual impact.</p> <p>The Council is required to address evidenced need for employment land by seeking sites within Ribble Valley and evidence considers that there is a lack of suitable employment land in the Longridge area.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 3	EAL3	NS	NS	NS	
Summary of issue raised:						
Objects to EAL3 on highway/traffic grounds including damage to road surfaces from anticipated levels of traffic. Feels that proposals are too close to residential areas and schools and playgrounds. Also feels that industrial uses will create pollution and noise						
Council's response:						
The site has been the subject of a thorough Sustainability Appraisal process and the Council have been advised by the Highways Authority in terms of road safety, access and other associated matters and they consider that in principal the site can be accommodated from a highway perspective. Matters of noise generation would be considered in detail at any planning application stage.						
Does this response give rise to:	Focused change	×	Minor change	×	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL 3 res resp 5	EAL 3	NS	NS	NS	
Summary of issue raised:						
Objects on basis of proximity to residential areas, unsuitability of local roads for anticipated traffic, increased noise and air pollution, also that the site is within the AONB and will have negative impacts on local tourism.						
Council's response:						
<p>The site has been subject to a detailed and thorough Sustainability Appraisal.</p> <p>The Council have been advised by the Highways Authority that they have no 'in principal' objection to the site and the County Council have not reported any concerns over air pollution issues.</p> <p>In addition, noise and air pollution issues would be considered at a subsequent planning application stage in conjunction with siting issues that would impact on the immediate landscape.</p> <p>The site is not within the AONB.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Resident	EAL3 res resp 6	EAL 3	NS	NS	NS	
Summary of issue raised:						
<p>Objection to the development of the employment site EAL3 mainly on access and highway grounds. There was a fatality in the vicinity of the access; the location is a well-known accident blackspot and traffic has increased to an unsustainable level. The road is hazardous and unsuitable for increased traffic. Questions whether an extensive traffic survey including HGVs will be carried out. There will also be impacts on wider highway network and increased emissions, pollutants and health risks.</p> <p>The Core Strategy promotes the A59 corridor for industrial development. Attention is drawn to the provisions of policy DMG1 of the Core Strategy regarding access.</p>						
Council's response:						
<p>No issues have been raised to date by the Highway Authority (LCC in relation to traffic, highways and access issues or impacts on the wider network which would preclude the development of the site. Detailed matters will be considered at the planning application stage including access, infrastructure and visual impact. The proposed allocation of the site has taken account of the Sustainability Appraisal process.</p> <p>The Council is required to address evidenced need for employment land by seeking sites within Ribble Valley and evidence considers that there is a lack of suitable employment land in the Longridge area. The Core Strategy does not seek exclusively to direct employment development towards the A59 corridor but also to the main settlements of Clitheroe, Whalley and Longridge together with land at Barrow Enterprise Site and the Lancashire Enterprise Zone. Policy DMG1 will be taken into account at the planning application stage.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 7	EAL3	NS	NS	NS	
Summary of issue raised:						
<p>Objects to EAL3 in terms of impacts within Grimsargh village in Preston City Council area, specifically highways infrastructure and traffic congestion around the Skew Bridge, proximity of anticipated traffic to local schools and associated air pollution. Also feels that more suitable sites are available elsewhere, including M6 junction 31a and the A 59 corridor. Also feels that there will be an impact on local heritage and character.</p>						
Council's response:						
<p>The site has been subjected to a thorough and detailed Sustainability Appraisal.</p> <p>The Council are advised by the Highways Authority and other County Council bodies in terms of traffic safety, effect on infrastructure and air pollution and they have no objection to the site and its proposed uses in principal.</p> <p>Elements of traffic management would be addressed through a subsequent planning application stage as would immediate site impacts on the local landscape.</p> <p>The Council is required to address evidenced need for employment land by seeking sites within Ribble Valley and evidence considers that there is a lack of suitable employment land in the Longridge area.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 9	EAL3	NS	NS	NS	
Summary of issue raised:						
Objects on the grounds of the site being located in the AONB and the impact on local tourism; that it is too close to local schools and houses creating road safety and air pollution issues and that the local road infrastructure is inadequate.						
Council's response:						
<p>The site is not within the AONB however the specific landscape issues relating to any development of the site would be considered in detail at a planning application stage.</p> <p>The site has been subjected to a thorough and detailed Sustainability Appraisal and the local Highways Authority have advised the Council that they have no in principal objection to the site. The County Council have also not raised any issues regarding air pollution. Noise and other matters would also be considered at a planning application stage.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Resident	EAL3 res resp 10	EAL3	NS	NS	NS	
Summary of issue raised:						
Objection to the development of the employment site EAL3 on grounds of impact on AONB and additional traffic, in addition to impacts of new housing development.						
Council's response:						
<p>No issues have been raised to date by the Highway Authority (LCC) in relation to traffic, highways and access issues or impacts on the wider network which would preclude the development of the site. Detailed matters will be considered at the planning application stage including access, infrastructure and visual impact. The proposed allocation of the site has taken account of the Sustainability Appraisal process.</p> <p>The Council is required to address evidenced need for employment land by seeking sites within Ribble Valley and evidence considers that there is a lack of suitable employment land in the Longridge area.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 11	EAL3	NS	NS	NS	
Summary of issue raised:						
<p>Objects to EAL 3 on the grounds of highway and traffic concerns.</p> <p>Also feels that there is no evidence of the need for employment land</p>						
Council's response:						
<p>The Council are advised by the Highways Authority that they have no 'in-principal' objection to the site.</p> <p>The Council has evidenced need for employment sites within the Longridge area (2013 Employment Land Review) and the site has been the subject of a thorough and detailed Sustainability Appraisal.</p> <p>The Environment Agency has raised no flood related issues with the site nor has Lancashire County Council as the Lead Local Flood Authority. The site would be the subject of a detailed Flood Risk Assessment (FRA) at any subsequent Planning application.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 12	EAL3	NS	NS	NS	
Summary of issue raised:						
Considers there to be little evidence of need for new employment land. Site has poor access. Process has been badly handled.						
Council's response:						
<p>The Council is required to address evidenced need for employment land by seeking sites within Ribble Valley and evidence considers that there is a lack of suitable employment land in the Longridge area, as shown by the evidence base.</p> <p>No specific comments on the site access have been submitted by the Highways Authority, however site access would be considered in details as part of a planning application.</p> <p>Ribble Valley considers that the plan making process has been undertaken in accordance with the Regulations.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL 3 res resp 13	EAL 3	NS	NS	NS	
Summary of issue raised:						
<p>Objects to EAL3 on traffic grounds and effect on the nearby St Michael's Primary School.</p> <p>States that the Core Strategy highlights the A59 corridor as a suitable location for industry.</p>						
Council's response:						
<p>The Council have been advised by the Highways Authority that it has no 'in-principal' objection to the site.</p> <p>The site has also been subjected to a thorough Sustainability Appraisal analysis.</p> <p>The Core Strategy also states that employment development will be directed towards the Longridge area (Policy EC1) and there is evidenced need (2013 Employment Land Review) for employment sites in the Longridge area.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Resident	EAL3 res resp 14	EAL3	NS	NS	NS	
Summary of issue raised:						
Objection to the development of the employment site EAL3 on grounds of: impacts on the AONB, tourism and open countryside; potential for further industrial growth; remote location from motorway network; impacts of additional traffic, including noise and pollution; impact on conservation sites; more suitable sites available nearer the motorway and on the A59 corridor, and impact on open views from heritage sites and the AONB.						
Council's response:						
<p>The Council is required to address evidenced need for employment land by seeking sites within Ribble Valley and evidence considers that there is a lack of suitable employment land in the Longridge area. The provision of employment sites in Longridge is in accordance with the Core Strategy (Key Statement EC1). The proposed allocation of the site has taken account of the Sustainability Appraisal process.</p> <p>No issues have been raised to date by the Highway Authority (LCC) in relation to traffic, highways and access issues or impacts on the wider network which would preclude the development of the site. Detailed matters will be considered at the planning application stage including access, infrastructure and visual impact.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not state

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private Individual	EAL3 res resp 15	EAL3	NS	NS	NS	
Summary of issue raised:						
<p>Objects to EAL3 on the grounds of highway safety concerns, including past fatalities on this stretch of road and also concerns relating to nearby schools and residential amenity.</p> <p>Also considers that there are existing employment units available.</p> <p>Also concerns over impact on the environment including the AONB.</p>						
Council's response:						
<p>The Council are advised by the Highways Authority that it has no 'in- principal' concerns regarding this site and it has been subjected to detailed Sustainability Appraisal (SA). Detailed matters can also be addressed through a subsequent planning application.</p> <p>The Council has evidenced need for employment sites in the Longridge area (2013 Employment Land Review)</p> <p>While the site is not within the AONB its environment and landscape impact has been considered through the SA and would also be addressed in detail through any subsequent planning application. The Environment Agency have raised no objection to the site.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 16	EAL3	NS	NS	NS	
Summary of issue raised:						
Objection to EAL3. Countryside and highways (congestion and safety) concerns.						
Council's response:						
No specific comments in relation to congestion and highway safety have been submitted by the Highways Authority however these issues, along with impact on the countryside environment would be considered in detail as part of a planning application.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 17	EAL3	NS	NS	NS	
Summary of issue raised:						
<p>Objects to EAL3 on the grounds of highway congestion and road safety including its relationship to a local school and local housing.</p> <p>Considers that there are more suitable employment sites.</p> <p>Concerned over impact on AONB and tourism</p>						
Council's response:						
<p>The Council are advised by the Highways Authority that they have no 'in-principal' objection to the site.</p> <p>The site has been subjected to a thorough Sustainability Appraisal and has evidenced need (2013 Employment Land Review) for employment sites in the Longridge area.</p> <p>Whilst the site is not within the AONB, local landscape impacts would be considered and addressed through any subsequent planning application.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Resident	EAL3 res resp 18	EAL3	NS	Unsound J	NS	
Summary of issue raised:						
Objection to the development of the employment site EAL3 mainly on highway and traffic grounds, including: increased traffic and congestion on wider road network, unsuitable access; cumulative impacts of other developments; and impact on public rights of way.						
Council's response:						
No issues have been raised to date by the Highway Authority (LCC) in relation to traffic, highways and access issues or impacts on the wider network which would preclude the development of the site. Detailed matters will be considered at the planning application stage.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 19	EAL3	NS	NS	NS	
Summary of issue raised:						
Objects to EAL3 on the grounds of impact on nearby Biological Heritage Sites, on the AONB; impact on tourism, traffic concerns including pollution and noise, congestion and road safety. Also that there are alternative employment units available						
Council's response:						
<p>Relevant conservation consultees have not indicated that development on this site would affect the BHS sites.</p> <p>The site is not in the AONB but its local landscape and environmental impacts, such as on views from local roads, would be addressed through any subsequent planning application.</p> <p>The local Highways Authority have indicated to the Council that they have no objection 'in-principal' with the proposed use of this site and also that more detailed matters eg access and hours of work could be addressed through a subsequent planning application.</p> <p>The Council's evidence base (2013 Employment Land Review) indicates that there is a need for additional employment land in the Longridge area. This is also stated within the adopted Core Strategy DS1</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 20	EAL3	NS	NS	NS	
Summary of issue raised:						
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.						
Council's response:						
No specific comments in relation to highway issues have been raised by the Highways Authority however these issues, along with impact on the countryside environment would be considered in detail as part of a planning application. It is not considered that the site is overly remote from the M6.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 21	EAL3	NS	NS	NS	
Summary of issue raised:						
<p>Objects to EAL3 on the grounds of: it is not specifically shown in the Core Strategy and should already have been “earmarked”. Also there is no need for the site as Longridge Town centre already has available premises. Development of the site could also impact on local landscape and heritage and tourism. Also concerned about flood risk, traffic and associated pollution. Also feels that there has been a lack of communication with adjacent local authorities.</p>						
Council’s response:						
<p>The Core Strategy is a strategic document and does not allocate employment sites beyond the strategic site at BAE in Samlesbury. It is the exact purpose of the HED DPD to allocate such sites and therefore this is the appropriate allocation stage to raise this site. The Council’s evidence base (2013 Employment Land Review) indicates that there is a need to allocate employment land in the Longridge area and, in wider terms, the council has a responsibility to allocate land within Ribble Valley to supply the area’s needs. Consultees have not raised fundamental questions relating to the site’s effect on local tourism and the site has been subjected to a thorough and detailed Sustainability Appraisal. More localised and site specific impacts on landscape would be dealt with at planning application stage. Environment Agency has not raised any concerns in principal over flood risk and any planning application would involve a Flood Risk Assessment (FRA) of the site. The local Highways Authority has not raised any objection in principal over any traffic and air pollution implications of development of this site. The Council have liaised with all adjacent local authorities throughout the development of this DPD and have also contributed comments to other Council’s plans.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 23	EAL3	NS	NS	NS	
Summary of issue raised:						
Objects to EAL3 on the grounds of traffic congestion and associated disruption to local residents; previous road safety concerns and that there are alternative employment sites at Red Scar						
Council's response:						
<p>The Council are advised by the local Highway Authority that they have no objection in principal to the site and matters such as detailed access arrangements and hours of working would be addressed through a subsequent planning application.</p> <p>The Red Scar sites are within Preston City local authority and the Council are tasked with addressing Ribble valley's specific land use needs within the local authority area. The 2013 Employment Land Review indicates that there is a need for employment land in the Longridge area.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 24	EAL3	NS	NS	NS	
Summary of issue raised:						
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.						
Council's response:						
No specific comments in relation to highway issues have been raised by the Highways Authority however these issues, along with impact on the countryside environment and AONB etc, would be considered in detail as part of a planning application. While there may be sites available at Red Scar (within the Borough of Preston), Ribble Valley has a duty to meet the objectives of the adopted Core Strategy and the proven identified need for employment land within the borough (identified within the RV Employment Land review).						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 25	EAL3	NS	NS	NS	
Summary of issue raised:						
Objects to EAL3 on the grounds of: loss of greenfield land, no evidence of need for employment land and there are alternative sites available elsewhere in Longridge. Also concern over the impact on the AONB, traffic, flooding and impact on local schools and pollution.						
Council's response:						
The Council's evidence base (2013 Employment Land Review) indicates that there is a need to allocate employment land in the Longridge area and, in wider terms, the council has a responsibility to allocate land within Ribble Valley to supply the area's needs.						
The Council has applied its Core Strategy policies in considering potential brownfield sites, but analysis has not revealed sufficiently suitable brownfield sites in the Longridge area.						
Consultees have not raised fundamental questions relating to the site's effect on local tourism and the site has been subjected to a thorough and detailed Sustainability Appraisal. More localised and site specific impacts on landscape would be dealt with at planning application stage.						
Environment Agency has not raised any concerns in principal over flood risk and any planning application would involve a Flood Risk Assessment (FRA) of the site.						
The local Highways Authority has not raised any objection 'in-principal' over any traffic and air pollution implications of development of this site.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Resident	EAL3 res resp 26	EAL3	NS	NS	NS	
Summary of issue raised:						
<p>Objection to the development of the employment site EAL3 on grounds of: impact on AONB, countryside, wildlife, habitats and tourism; increased traffic, pollution and associated impacts on health; distance from motorway resulting in traffic passing through housing and rural areas; particular concerns about impacts of traffic and noise on health and well-being of pupils of nearby special school.</p>						
Council's response:						
<p>The Council is required to address evidenced need for employment land by seeking sites within Ribble Valley and evidence considers that there is a lack of suitable employment land in the Longridge area. The provision of employment sites in Longridge is in accordance with the Core Strategy (Key Statement EC1). The proposed allocation of the site has taken account of the sustainability appraisal process.</p> <p>No issues have been raised to date by the Highway Authority (LCC) in relation to traffic, highways and access issues or impacts on the wider network which would preclude the development of the site. Detailed matters will be considered at the planning application stage including access, infrastructure and visual impact.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 27	EAL3	NS	No to J,E and PP	NS	
Summary of issue raised:						
Objects to EAL 3 on the grounds of: need for employment land, effect on local tourism; highway safety and associated traffic and infrastructure issues.						
Council's response:						
<p>The Council's evidence base (2013 Employment Land Review) indicates the need for employment sites in the Longridge area.</p> <p>The Sustainability Appraisal of the HED DPD does not indicate any significant tourism impact and local impact on landscape would be addressed through a subsequent planning application</p> <p>The Council are advised by the local Highway Authority that it has no 'in- principal' objection to the site</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 28	EAL3	NS	NS	NS	
Summary of issue raised:						
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.						
Council's response:						
No specific comments in relation to traffic impact and pollution have been identified by the Highways Authority however these issues, along with specific details of scale, height, material and impact on surrounding sites, as well as the impact on AONB and tourism, would be considered in detail as part of a planning application.						
Does this response give rise to:	Focused change	×	Minor change	×	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	EAL3 res resp 29	EAL 3	NS	NS	NS	
Summary of issue raised:						
Objects to EAL3 on the grounds of: proximity to natural heritage sites and the AONB, impact on tourism, highways and associated pollution and that more suitable sites are available.						
Council's response:						
<p>The Sustainability Appraisal of the HED DPD does not indicate significant tourism impact from the proposed allocations and site impacts on the local landscape would be addressed through the subsequent planning application process. Statutory and heritage consultees have not raised in principal concerns over effects on natural heritage sites.</p> <p>The local authority is advised by the Highways Authority that it has no 'in-principal' objection to this site.</p> <p>The Council has applied its Core Strategy policies in relation to seeking suitable brownfield sites in the Longridge area but has not found such sites. Its evidence base (2013 Employment Land review) indicates the need to find such sites in the Longridge area as a part of addressing wider land use needs within the Ribble Valley area.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Resident	EAL3 res resp 30	EAL3	NS	NS	N	
Summary of issue raised:						
Objection to the development of the employment site EAL3 on highway and access grounds as follows: inappropriate location in rural areas; site and all through routes are unsuitable for HGVs, too close to residential areas; will cause noise and air pollution; poorly located access, close to blind bend, bridleway and public footpath. It is considered that there are more appropriate sites closer to M6 J31a, M65 and the A59 corridor.						
Council's response:						
<p>The Council is required to address evidenced need for employment land by seeking sites within Ribble Valley and evidence considers that there is a lack of suitable employment land in the Longridge area. The provision of employment sites in Longridge is in accordance with the Core Strategy (Key Statement EC1). The proposed allocation of the site has taken account of the Sustainability Appraisal process.</p> <p>No issues have been raised to date by the Highway Authority (LCC) in relation to traffic, highways and access issues or impacts on the wider network which would preclude the development of the site. Detailed matters will be considered at the planning application stage.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)	
Private individual	EAL3 resident resp 1	EAL 3	No	Unsound J,E,PP,	Yes
Summary of issue raised:					
<p>Objects to EA 3 on the grounds of: Traffic noise, vibration and road safety impacts including on nearby schools. Asserts that the current road surface is being damaged by current traffic. The site is being currently used in contravention of its current planning permission. The site is not needed for employment purposes as there are other sites closer to the motorway in Preston City Council's area. Wishes for currently permitted housing sites to be reduced. Asserts that there has been no Duty to Co- operate liaison with adjacent local authorities. Impact on local wildlife and environment. Residual requirement for employment land has already been satisfied. Quotes LCC Highways concerns about adjacent BKW proposal. Inadequate local infrastructure. Cumulative effects of all proposed sites being taken forward in SA. Flawed consultation process as no allocation on Proposals Maps. Previous refusals Ransom strips re deliverability. Open countryside site. Longridge Neighbourhood Plan</p>					
Council's response:					
<p>The Council's advisor on road safety, traffic levels and associated matters is the local Highways Authority. They have not raised any 'in-principal' objection to the allocation of this site. Specific matters, such as acceptable and safe access, hours of operation and other relevant matters would be a part of any subsequent application, which would be considered on its own merits in relation to this site.</p> <p>In terms of the need for employment sites in the Longridge area, the Council are required to seek suitable local sites to accommodate Ribble Valley's own evidenced employment land needs. This would be in addition to that supplied by adjacent Borough's in accordance with their needs, such as Preston City Council. The figure of overall employment land need quoted is a minimum requirement for the Borough as a whole and the current evidence base (Employment Land review 2013) stated that there was a continuing need for employment land specifically in the Longridge area.</p>					

The Council has engaged with other adjacent local authorities over a number of years (as have those same bodies with RVBC) as a part of wider planning liaison and within the Duty to Co-operate requirements over both housing and employment land needs.

In relation to the expressed view that current legal planning permissions for housing should be reduced, this is beyond the scope of this document and this consultation.

Previous quoted refusals in 2006 under previous policy regimes are not necessarily applicable under new policy circumstances.

The cumulative effects comments mentioned in the SA are a product of the document having to consider all hypothetical scenarios. In this case a scenario that all the proposed employment sites considered in previous consultations would all be given permission. As the HED DPD and its SA makes clear this is not the case and most have been discounted for a variety of reasons leaving the only development being considered is the single site that is being allocated. This relates to the anticipated level of local need.

The Longridge Neighbourhood Plan is not at a sufficiently advanced stage to be a material consideration in the judgement of this allocation.

In terms of land ownership issues the information supplied to the Council at this stage indicates that the site is deliverable.

The site did not appear on the Regulation 18 versions of the Proposals Maps as these maps, which was made clear at the time, were draft and preparatory to the finalisation of allocated sites ie the HED DPD. i.e they specifically did not include any allocations. Should the HED DPD allocations sites be approved then they would be added to the maps at a subsequent point.

While the site is not within the settlement boundary of Longridge it is considered to be well related to it. Policy permits suitable employment sites within the Open Countryside subject to a variety of considerations.

In terms of impact on local wildlife and the environment no 'in-principle' concerns have been passed to the Council by relevant agencies. There are no designated natural heritage sites on the site. Detailed matters of site layout and impact on the immediate locality would be addressed through a subsequent planning application.

Does this response give rise to:	Focused change	*	Minor change	*	No change	✓
---	----------------	---	--------------	---	-----------	---

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Resident	EAL3 res resp 22	EAL3	NS	NS	NS	
Summary of issue raised:						
<p>Objection to the development of the employment site EAL 3. Points out that the site is in Hothersall Parish not Longridge. Also refer to support given to the proposal by two Longridge councillors who live elsewhere in Longridge and are not residents of the Ribble Valley.</p> <p>State that Hothersall was not represented on the Proposals Map accompanying the Regulation 18 consultation in August 2016.</p> <p>Specific objections to the site are: traffic, i.e. hazardous location on B5269 Lower Road; environmental impacts due to proximity to area of biological significance including the AONB; and impacts on the open countryside, tourism when there are sites available more suitably located closer to motorway network.</p>						
Council's response:						
<p>It is recognised that the site is located in the parish of Hothersall but in close proximity to the built up area of Longridge to enable it to meet the employment needs of the area. The reference to Longridge Councillors does not impact upon the planning merits of the allocation. The Proposals Map utilises an Ordnance Survey base and at the scale presented, does not name all settlements and parishes.</p> <p>The Council is required to address evidenced need for employment land by seeking sites within Ribble Valley and evidence considers that there is a lack of suitable employment land in the Longridge area. The provision of employment sites in Longridge is in accordance with the Core Strategy (Key Statement EC1). The proposed allocation of the site has taken account of the Sustainability Appraisal process.</p> <p>No issues have been raised to date by the Highway Authority (LCC) in relation to traffic, highways and access issues or impacts on the wider network which would preclude the development of the site. Detailed matters will be considered at the planning application stage including access, infrastructure and visual impact.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private Individual	EAL3 resident res 1	Policy EAL3	NS	NS	NS	
Summary of issue raised:						
<p>Objection to EAL3. States that EAL3 is similar to 3/2017/0317 and that all objections to this application also apply to EAL3. Highway concerns of narrow roads and pollution in terms of major industrial and warehousing site in middle of the countryside. Current noise and residential amenity issues experienced from the existing business. Respondent states that there are new industrial units and offices and land available immediately at Roman Way, Red Scar and Knowle Green. Concerned that the industrial site is clear to a school for autistic children. States that the residual 2.41ha has been met. PDL should be used instead of greenfield where possible. Industrial development at EAL3 would harm the development strategy as it should be located at Barrow Enterprise Site and Sablesbury Enterprise Zone and is therefore not sustainable development and contrary to DS1, DS2, DMG1, DMG2, EN2 and DME2 of the CS. The proposal would create a harmful precedent. The site is located outside the Settlement Boundary in Open Countryside. EAL1 will have less impact on Residential Amenity than EAL3. Concerned of impact on AONB, ecology, trees, conservation areas and listed buildings.</p>						
Council's response:						
<p>LCC raised no concerns at Reg 18 on the HED DPD allocation site in this location. EAL3 site is not located close to Hillside Specialist school (it is application 3/2017/0317 not the EAL3 application). The 2.41ha residual requirement has not been met at time of writing the report. Comment in relation to the use of pdl rather than greenfield is noted. The CS does not preclude development in locations other than Barrow Enterprise Site and Sablesbury Enterprise Zone and is therefore not contrary to DS1, DS2, DMG1, DMG2, EN2 and DME2 of the CS. The allocation would not create a precedent as the HED DPD includes all the allocations proposed up until 2028. No more are proposed for this site/area. It is not contrary to policy for the allocation to be located outside of a Settlement Boundary. Impact on AONB, ecology, trees, conservation areas and listed buildings will be considered at planning application stage. Comments from Arcadis: Reference to sustainable transport links is based upon the existence of the bus route. More specific recommendations to improve sustainable transport links to and from the area can be included as part of the SA assessment for site 10. The text on this matter can be revisited to confirm the meaning and rational for this statement. The SA identifies a range of potential effects including cumulative. Note that quality of life also includes provision of good quality housing. Recommendations can be included for Curlew-specific ecological surveys to identify Curlew populations on and around the site and depending on the findings of these surveys, mitigation measures proposed to protect and enhance existing and future populations. More specific recommendations can be included in liaison with the council in order to improve sustainable transport links to and from the site can be included along with recommendations of pedestrian crossing and safe access to the site. An increase in traffic was included as a cumulative impact of development in the respective area. In depth assessment /surveys of speeds and flows on local roads is not included within the remit of a Sustainability Appraisal.</p>						
Does this response give rise to:	Focused change	×	Minor change	×	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private Individual	EAL3 resident res 4	Policy EAL3	NS	NS	NS	
Summary of issue raised:						
<p>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.</p>						
Council's response:						
<p>LCC raised no concerns at Reg 18 on the HED DPD allocation site in this location. Specific details relating to traffic and highways safety would be considered as part of a planning application on the site. The negative outcomes identified in the SA relate to the Sustainability Appraisal Objectives. However, the representations have been sent on to Arcadis for their further consideration and any necessary amendments to the SA will be made (if applicable).</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private Individual	EAL3 resident res 8	Policy EAL3	NS	NS	NS	
Summary of issue raised:						
<p>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</p>						
Council's response:						
<p>LCC have raised no concerns in relation to traffic congestion in this location.</p> <p>Preston City Council and RVBC have been working together throughout the development of the Evidence Base, adopted Core Strategy and the HED DPD and it is considered that it has satisfied its Duty to Co-operate. An example of the cross boundary working between the two areas was evident in the 'Longridge Adjustment' which formed part of the Core Strategy, where the housing numbers in Longridge were reduced to reflect the level of development over the border in Preston.</p> <p>The specific impacts on the AONB, BHS, tourism and walking and cycling routes will be considered at planning application stage.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private Individual	EAL3 resident resp2	Policy EAL3	NS	NS	NS	
Summary of issue raised:						
Objecting to development of site EAL3 (site at Higher College Farm) on grounds of increased traffic on a dangerous road, use of greenfield site instead of PDL, lack of utilities to the site, visual appearance at the start of Ribble Valley as a tourist area, is 24 hr traffic/ working to be allowed?						
Council's response:						
All of the issues raised would be considered in detail at planning application stage. No concerns were raised by LCC Highways at Regulation 18 stage. Working hours for the site would be conditioned as part of the planning application.						
Does this response give rise to:	Focused change	×	Minor change	×	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	HAL2 resident resp 1	HAL2	NS	NS	NS	
Summary of issue raised:						
Objects to HAL2 on the grounds of impact on schooling, traffic generation, access, drainage and impact on wildlife.						
Council's response:						
<p>The Local Education Authority has raised no objection to the allocation and considers that likely pupil numbers can be accommodated.</p> <p>The local Highway Authority has raised no objection to the site or its access. Detailed issues such as access would be dealt with through the planning application process.</p> <p>The Environment Agency and the Lead Local Flood Authority have raised no objection on flooding grounds. At any planning application stage a Flood Risk Assessment would be required.</p> <p>In terms of wildlife there are no natural heritage designations in the area of the site and the Council's advisors on environmental impact and the HED DPD's Sustainability Appraisal do not indicate any significant impact on local biodiversity. A subsequent planning application would involve a detailed assessment of such matters.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	HAL2 res resp 10	HAL2	NS	NS	NS	
Summary of issue raised:						
Objects to HAL2 on the grounds of: traffic congestion and impact on wildlife						
Council's response:						
<p>The Highway Authority has raised no in principal objection to the site in terms of highways issues. Should a planning application come forward detailed access issues would be considered.</p> <p>The HED DPD's Sustainability Appraisal and advice from relevant conservation bodies does not indicate any significant 'in- principal' reason to oppose the allocation of this site.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	HAL2 res resp 14	HAL2	NS	NS	NS	
Summary of issue raised:						
Objects to HAL2 on the grounds of impact on local woodland, which they consider to be ancient.						
Council's response:						
The woodland on the southern boundary of HAL2 is not designated. However the Council considers it appropriate to protect it by excluding it from a revised HAL2 by revising the southern boundary of HAL2 to the north.						
Does this response give rise to:	Focused change	✓	Minor change	*	No change	*

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	HAL2 resident resp 6	HAL 2	NS	NS	NS	
Summary of issue raised:						
<p>Objects to HAL2 on the grounds of drainage, mineral designation, impact on wildlife, access, traffic generation, noise pollution, presence of pylons and water pipelines, impact on local schools and a former landfill 250m away, impact on local house prices, size of site in relation to housing need figures for Wilpshire.</p>						
Council's response:						
<p>The Environment Agency and the Lead Local Flood Authority have raised no in principal objections to this site. A Flood Risk Assessment (FRA) would be required should an application come forward. The local Minerals and Waste Authority has raised no objection to the site on the basis of mineral issues and the landfill issue. The Highway Authority has raised no 'in- principal' objection to the site in terms of highways issues. Should a planning application come forward detailed access issues would be considered.</p> <p>It is considered that detailed site design at planning application stage could accommodate the presence of the pylons and water pipeline and an outline design doing so has already emerged through this Regulation 19 consultation.</p> <p>Impact on local house prices is not a planning consideration.</p> <p>The site is considered able to accommodate the currently calculated residual housing need for Wilpshire expressed in the Core Strategy it is also considered to be one of a very limited number of sites that could be safeguarded for likely future housing needs.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	HAL 2 resident resp 8	HAL 2	NS	NS	NS	
Summary of issue raised:						
Objects to HAL 2 on the grounds of traffic generation; access, pressure on local schools, drainage, pressure on wildlife						
Council's response:						
<p>The Environment Agency and the Lead Local Flood Authority have raised no 'in-principal' objections to this site. A Flood Risk Assessment (FRA) would be required should an application come forward.</p> <p>The Highway Authority has raised no 'in- principal' objection to the site in terms of highways issues. Should a planning application come forward detailed access issues would be considered.</p> <p>The Local Education Authority has no objection to the site in relation to likely pupil numbers and the ability of local schools to accommodate them.</p> <p>The HED DPD's Sustainability Appraisal and advice from relevant conservation bodies does not indicate any significant in principal reason to oppose allocation of this site.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	HAL2 resident resp 12	HAL2	NS	NS	NS	
Summary of issue raised:						
Objects to HAL2 on the grounds of land drainage, access onto A666 and associated congestion						
Council's response:						
<p>The Environment Agency and the Lead Local Flood Authority have raised no 'in-principal' objections to this site. A Flood Risk Assessment (FRA) would be required should an application come forward.</p> <p>The local Highway Authority has raised no in principal objection to the site in terms of highways issues. Should a planning application come forward, detailed access issues would be considered.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individuals	HAL2 resident resp 2	Policy HAL2 Land at Wilpshire	NS	NS	NS	
Summary of issue raised:						
<p>Opposes the policy on the following grounds:</p> <ul style="list-style-type: none"> Local schools will not be able to cope and are currently having their resources cut. Additional traffic generation on the adjacent A666 Access from Salesbury View may prove problematic Drainage of the site has been historically poor Effect on local wildlife 						
Council's response:						
<p>The site has been subject to previous consultation at the Reg 18 stage and the relevant education and highways bodies and environmental bodies have not raised concerns over access, drainage, school provision or unacceptable impacts on local wildlife. In addition the site has been subject to a Sustainability Appraisal which also considers it to be a sustainable site.</p>						
Does this response give rise to:	Focused change	x	Minor change	x	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private Individual	HAL2 resident resp 3 and HAL2 resident resp 3 additional	HAL2	NS	Unsound (not J or E)	No	
Summary of issue raised:						
Objects to HAL2 stating that it contains ancient deciduous woodland with crested newts, bats, owls and woodland birds. Considers there will be an impact on the footpath through the site.						
Council's response:						
Comments noted. Wooded area is not designated ancient woodland. Tree and ecological/ wildlife issues as well as potential PROW would be considered in detail at planning application stage, however the southern parcel of the site has been amended to remove the wooded area from the allocation.						
Does this response give rise to:	Focused change	*	Minor change	✓	No change	*

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private Individual	HAL2 resident Resp 4	Policy HAL2	NS	NS	NS	
Summary of issue raised:						
<p>Object to the HAL2 as the land is ancient deciduous woodland, home to crested newts, frogs, toads, bats, owls, woodpeckers, deer, hedgehogs and foxes.</p> <p>Doesn't make economic sense to build on this type of habitat on steep land which banks down to a stream and will have an effect on wildlife and woodland.</p> <p>Traffic flow would become more congested.</p> <p>A broader view of the total effects of extensive 'new build' needs to be taken with respect, not just to mankind to the future of the wildlife, woodland and farming.</p> <p>Shopping in and out of Blackburn is an expedition as it is – unless we're all expected to order deliveries over the internet then maybe we should all be given an allowance by the local government for restricting our personal movements and given free access to the internet to cope with the increase in population.</p>						
Council's response:						
<p>The woodland is not designated as ancient deciduous woodland however the site has been reduced to exclude this southern parcel of land. In addition any tree covered area would be considered as part of any planning application for the site in accordance with the adopted policies. All of the issues raised would be considered as part of a planning application.</p> <p>LCC did not raise any concerns at Reg 18 stage. Building costs would be incurred by the developer of the site.</p> <p>A broader view of new build has been looked at in terms of Objectively Assessed Need for the borough where both the affordable and market housing requirement has been assessed.</p>						
Does this response give rise to:	Focused change	*	Minor change	✓	No change	*

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated.

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private Individual	HAL2 resident resp 5	Policy HAL2	NS	NS	NS	
Summary of issue raised:						
<p>Objects to site HAL2 being included for housing. Resident's house backs onto the site. The site is currently used for grazing cows and home to Roe Deer, bats and crested newt.</p> <p>The fields are bordered by ancient deciduous woodland that goes down the embankment to Knotts Brook which then becomes Showley Brook. Electricity pylon next to field and wires pass over the field. High pressure water pipe under the field. Access road would be Salesbury View- a very steep narrow road that's treacherous in winter. Fields drain poorly in bad weather leading to run off that affect the main Whalley Road. Why has the ENV5 status been removed?- Surely we want to protect green belt.</p>						
Council's response:						
<p>The relevant policies would ensure that any potential disruption to wildlife habitats would be considered as part of a development proposal at planning application stage.</p> <p>The wooded area is not designated ancient woodland, however policies in the plan would consider and protect any potential impact on trees. Suitable drainage systems would be put in place as part of a planning application on the site as per the adopted policies. In addition the southern parcel of the site has now been removed from the allocation.</p> <p>Lancashire County Council have raised no concerns in relation to the site access, however this would also be looked at again as part of a planning application.</p> <p>The site was designated as ENV5 in the DWLP and was therefore designated as Safeguarded Land (safeguarded for future development) and not Greenbelt (Greenbelt policy was ENV4).</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	HAL2 res resp 7	HAL2	NS	NS	NS/	
Summary of issue raised:						
Objects to HAL2 on grounds of impact on wildlife.						
Council's response:						
Noted. Potential impact on wildlife would be considered in detail at planning application stage.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	HAL2 res resp 9	HAL 2	NS	NS	NS	
Summary of issue raised:						
<p>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.</p>						
Council's response:						
<p>Comments noted. Boundary of site has been amended to exclude woodland area to the south of the site. This will also create a larger area of separation between RV and BwD. See amendments to Proposals Map document for specific boundary details.</p>						
Does this response give rise to:	Focused change	✓	Minor change	*	No change	*

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	HAL2 resident resp 11	HAL2	NS		NS	
Summary of issue raised:						
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.						
Council's response:						
Site was designated as 'safeguarded land' in the Districtwide Local Plan as land to be safeguarded for potential future development (not land to be safeguarded or protection from future development).						
Potential impact on wildlife, traffic and privacy concerns would all be considered in detail as part of a planning application on the site.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	HAL2 resident resp 13	HAL2	NS	Unsound	NS	
Summary of issue raised:						
Objects to HAL2 and considers it not to 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.						
Council's response:						
Traffic concerns noted. Highway Authority (LCC) and Highways England have been consulted but no specific concerns have been raised. The specific impact of development proposals in terms of traffic (safety and congestion) would be considered as part of a planning application on the site once the details of the scheme are determined.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	HAL2 resident resp 15	HAL2	NS	NS	NS	
Summary of issue raised:						
Objects to HAL2. Concerns over impact on wildlife and natural habitat.						
Council's response:						
Potential impacts on wildlife and natural habitats would be considered in detail at planning application stage.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	Hoth 1	Policy EAL3 land at Higher College Farm, Longridge	NS	NS	NS	
Summary of issue raised:						
Strongly objects to the policy as considers it would be inappropriate to create an industrial estate in this area as it is primarily countryside.						
Council's response:						
The Council's evidence base indicates a need for employment sites in Longridge which is confirmed in the adopted Core Strategy and, following a Reg 18 Issues and Options consultation and an on-going Sustainability Appraisal on the HED DPD, this site was judged to be sustainable including being well related to Longridge and its employment needs.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	Hoth 2	Policy EAL3 Land at Higher College farm, Longridge	NS	NS	NS	
Summary of issue raised:						
<p>Opposes the allocated site on the following grounds:</p> <p>Traffic generation and associated road safety</p>						
Council's response:						
<p>The general area of the site, including a site adjacent to it to the east, has been subject to an Issues and Options consultation at Reg 18 in which the Highways Authority's views were sought on these matters and no specific concerns were raised</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	Individual 1	EAL3	NS	NS	NS	
Summary of issue raised:						
Objects to EAL3 on the grounds of impacts on ecology, biodiversity, woodlands.						
Council's response:						
Whilst there are no designated natural heritage sites on the allocation site the Sustainability Appraisal and consultee advice indicates that there are no in principal concerns about such impacts on this site. Immediate site specific impacts could be addressed through a subsequent planning application.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)	
Private Individual	Long res 1	General	NS/Yes/No	No: Unsound-not PP, not CwNP, not J, Not E	NS/Yes/No
Summary of issue raised:					
<p>Not PP: considers the doc is difficult to read and digest. Appreciates that it is drawn up to a set standard but considered this would be off-putting to many. Also considers the Proposals Map is poor, displaying 'hatching' not present on the key.</p> <p>Not CwNP: The housing allocation granted is not sustainable or affordable for local people. Developments previously approved are not a viable prospect at £180k to £350k (i.e. Tootle Green). Building houses to meet a quota rather than the local needs is unethical.</p> <p>Not PP: In relation to Traveller sites respondent could not find any definition as to where these would be located therefore breaching the 'positively prepared' element.</p> <p>Not Justified or PP: Increased 'load' on the roads and the impact to residents is ill-considered. Roadwork's have been on-going on Blackburn Road, Dilworth Lane and Preston Road and no consideration has been made to the impact on surrounding towns and villages of Longridge. This breaches the PP element.</p> <p>The proposed industrial development in Hothersall has been deceptively discounted from the Longridge 'Proposals Map' given that it impacts Longridge. The respondent also had to google the site 'Higher College' as they were unaware where it was. This breaches the justified element as more suitable sites are vacant around 'Bluebell Way' in Preston next to the 31A of the M6.</p> <p>Not Effective: Cross-boundary development with Longridge is not mentioned at all.</p> <p>Not PP: The plan makes reference to the building of 3 industrial sites in total the largest of which is the Samlesbury Enterprise Zone.</p>					

Respondent states that as yet only one unit has been built employing people on low pay. The Council is gabbling the success of the F-35 programme which may be reconsidered given the forthcoming general election.						
Council's response:						
<p>HED DPD is set out in accordance with the Regulations. The Council do not consider there to be any hatching on the Proposals Map which is not on the key and considers all designations are clearly presented.</p> <p>The Tootle Green site does not form part of this consultation. In relation to house prices, this is out of the remit of the HED DPD. A proportion of new development has to be made available for Local Needs Housing as part of the adopted Core Strategy policies. The 'quota' or number of affordable units required is determined by an objectively assessed local needs assessment.</p> <p>As stated in the adopted Core Strategy DMH2, there is no requirement to provide any additional Traveller sites and therefore, as set out in the justification to Policy TV1, the requirement is to provide criteria to guide decisions on any applications that may arise in relation to Traveller sites.</p> <p>LCC do have not raised any concerns at regulation 18. In addition this would be looked at in detail in accordance with the adopted policies as part of a planning application for the site.</p> <p>The Higher College Farm proposed allocation EAL3 has not been shown on the Proposals Map at this stage, as discussed in the HED DPD document, as it is not yet a formal allocation until it has passed through the Examination process and been found sound by an Independent Inspector. In terms of naming the site 'Higher College Farm', this was considered acceptable by the Council as it accurately describes the site location and was also put forward in the Call for Sites process with this site location name.</p> <p>Cross-boundary issues are discussed in the Core Strategy and an adjustment to the housing numbers (the 'Longridge Adjustment') take account of development on the Longridge side of the borough boundary. Details of this are not set out in the HED DPD as it is not intended to repeat adopted policy.</p> <p>The HED DPD does not propose any development at the Enterprise Zone. The 3 proposed allocation sites are at Longridge, Mellor and Simonstone.</p>						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	Newton Res resp 1	Existing Open Space site Newton	NS	NS	NS	
Summary of issue raised:						
Objects to designation of DMB 4 Open Space site on his property at Lowood and attaches evidence of lack of public access.						
Council's response:						
Council accepts evidence supplied by responder and will remove the DMB 4 existing open space site to the east of Lowood in Newton and amend the Proposals Map accordingly.						
Does this response give rise to:	Focused change	✓	Minor change	*	No change	*

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	Resident Barrow	No specific part of the Plan	NS	NS	NS	
Summary of issue raised:						
General objection to what is perceived to be over development in the Barrow area through planning permissions already granted.						
Council's response:						
Comments noted. No additional development in the Barrow area is proposed through this consultation document.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Individual	Resident re BKW resp 1	Policy EAL3 Land at Higher College Farm, Longridge	NS	NS	NS	
Summary of issue raised:						
<p>While there was, current to the consultation on the DPD, the development of a planning application on a site close to and to the east of the EAL3 site, the comments made here have also been considered to relate to the EAL3 site. They oppose Policy EAL3 on the following grounds:</p> <ul style="list-style-type: none"> • Traffic and associated road safety on local road • General effect on local views • Specific effect of traffic on local schools • Will not create genuinely new local jobs but just cause displacement from surrounding areas. 						
Council's response:						
<p>Responses from relevant Highways consultees have not indicated concern regarding either volumes of traffic or road safety impacts on the area.</p> <p>A Sustainability Appraisal has indicated that the site is a sustainable one and offers the most sustainability benefits when compared to other possible employment sites in the Longridge area. This has comprised responses from statutory consultees on landscape implications. The latter could be addressed through application of specific policies within the adopted Core Strategy.</p> <p>No evidence is supplied to underpin the assertion that the site will not create genuinely new local jobs. In addition it may help to enable local firms to expand or better support existing jobs within the wider economy.</p>						
Does this response give rise to:	Focused change	x	Minor change	x	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private individual	Resident Willows Park	None (relates to SHLAA)	NS	NS	NS	
Summary of issue raised:						
Asserts that site 37 in the RVBC SHLAA of 2009 is unavailable for development due to restrictive land ownership issues.						
Council's response:						
Noted for future update of SHLAA. No allocation of this site is proposed within the HEDPD.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EIP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private Individual	Tosside Res 1	General	NS	NS	No	
Summary of issue raised:						
Discusses White Paper (Fixing our broken housing market) and Neighbourhood Planning system.						
Council's response:						
Response noted. Comments and 'proposals' discussed in the response do not relate to the HED DPD.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated

Summary of main issues arising from representations to Reg 19 HED DPD Publication Version

Name of Organisation	PRN /Rep No	What Part of Plan does the rep relate to? (State policy or paragraph no)	Does the responder state the HED DPD is:		Does the Responder state intent to appear at EiP?	
			Legally Compliant	Sound/Unsound (J, E, PP, CwNP)		
Private Individual	Why res 1	None (relates to planning application)	NS	NS	NS	
Summary of issue raised:						
Response discusses development at Accrington Road, Whalley – primarily flooding and wildlife concerns.						
Council's response:						
Comments noted. The HED DPD does not propose any allocation at this location.						
Does this response give rise to:	Focused change	*	Minor change	*	No change	✓

Key: * J= Justified, E= Effective, PP= Positively Prepared, CwNP= Consistent with National Policy, NS = not stated