

Ribble Valley Borough Council



Housing & Economic Development- Development Plan Document

Regulation 22 (1) (c) (v) Statement

**Regulation 22 (1) (c) (v) statement
JULY 2017**

Summary of the main issues raised at Publication Stage



RibbleValley
Local Development Framework

Housing and Economic Development DPD Regulation 22(1)(c)(v)
summary of main issues
July 2017

1. Involving Stakeholders in the consultation on the Regulation 19 Housing & Economic Development DPD

- 1.1 The purpose of this document is to fulfil Regulation 22 (1) (c) (v) of the Town and Country Planning (Local Development) (England) Regulations 2012 (as amended), by providing a summary the main issues raised in representations made pursuant to Regulation 20 (i.e. those made at the Publication Stage – Regulation 19).
- 1.2 Prior to submission, documents were made available and any interested parties including consultation bodies invited to make representations in accordance with The Regulations.
- 1.3 Ribble Valley Borough Council provided the opportunity for any organisations or persons in or out of the borough to submit representations into the Housing and Economic Development-Development Plan Document (HED DPD) process by:
- opening an 6 week consultation response period between 28th April and 9th June 2017,
 - making the HED DPD and response forms available at all libraries in the borough, the Council Offices, the Station Buildings in Longridge and through the Parish Councils
 - publishing the HED DPD and both a downloadable response form on the Council’s website
- publishing press releases in the local press,
 - The Ribble Valley website was also kept up top date and contained links to all the relevant consultation documents via the homepage and the Planning Policy pages.
 - Individual letters and emails were also sent to groups, bodies and individuals on the LDF consultation database (which includes specific and general consultation bodies as set out in the Regulations), providing information of the publication in accordance with Regulation 19. Around 2,500 such letters were sent.

2. Outcome of the consultation process

- 2.1 The consultation on the Publication HED DPD (Regulation 19) was held for a six week period between 28th April 2012 and 9th June 2017. The Council received 140 responses to the publication HED DPD from a variety of individuals, specific consultees, special interest groups,

developers and agents, in accordance with Regulation 20. These responses were received by email, letter and response form.

- 2.2 Section three of this report identifies and summaries the main issues raised in the representations from Specific Consultees, Interest Groups and Other Organisations, Private Individuals and Developers and Agents.
- 2.3 The final part of this report (appendix 1) is made up of documentary evidence of the consultation illustrating that the document was made publicly available, together with details of how representations on the HED DPD could be made.

3. Issues from Specific Consultees, Interest Groups/ Other Organisations/ Private Individuals and Developers and Agents

- 3.1 The following section sets out a summary table of the main issues raised in the representations received from specific consultees, special interest groups, private individuals and developers and agents. This table is not intended to give a detailed summary of the issues or Ribble Valley’s response to this, but is instead intended to show the general areas of the plan where issues were highlighted.
- 3.2 In preparing the HED DPD the Council has been mindful of the “Duty to Co-operate” which was been introduced in the Localism Act 2011. This is particularly relevant to the preparation of a strategic policy document such as the HED DPD to ensure it properly addresses issues which may affect a wider area. The Council has sought to work collaboratively with relevant bodies (including the County Council, neighbouring authorities and public bodies) throughout the preparation of the Core Strategy to ensure that it is sound. Many of these bodies are also “specific consultation” bodies as defined in the regulations. Any issues raised by such partners at Regulation 19 stage are included in the following summary table.

NAME	BRIEF SUMMARY OF ISSUE(S) RAISED
Environment Agency (Env Ag 1)	Satisfied that the DPD is Sound from an Environment Agency perspective.
Blackburn with Darwen BC	Any transport assessments considering HAL2 must align with assessments undertaken on Blackburn side of boundary in terms of assumptions regarding planned and committed development traffic generation and impact. BwD must be consulted at scoping stage on any Transport assessment for site HAL2.
Pendle Borough Council	Do not consider that the HEDPD presents any significant cross boundary issues with Pendle.
Lancashire County Council (Sch 1)	Request an extension to deadline to make

	response.
Historic England	No comment to make
Natural England (Nat Eng1)	Makes specific reference to the Habitats regulations Assessment; seeking more information and explanation of how the conclusion has been reached.
Electricity North West	While noting that the proposed allocations could have an impact on their infrastructure this will be reviewed through the planning application process. No objection in principal.
Highways England	Consider that the allocations are unlikely to generate volumes of traffic sufficient to require RVBC to work with HE to improve the Strategic Highway Network in the area.
The Coal Authority	Considers all proposed allocations and the Proposals Map in the HED DPD are Positivity Prepared, Justified, Effective and Consistent with National Policy. Considers the Legal and Procedural requirements including duty to co-operate have been met.
North Yorkshire County Council	No specific comments. Discusses the NYCC LTP4.
Longridge Town Council	Considers that the HEDPD removes two of the original employment sites and regrets this. Feels also that the Core Strategy should have within it an Employment Strategy
Mellor Parish Council	Objects to HAL1 on the grounds of potential road drain flooding.
Wilpshire Parish Council	Consider that the southern boundary of HAL2 be redrawn further north to retain current woodland to act as a buffer along the boundary with Blackburn. Also offer observations about poor access; that the site should be related to latest housing needs and that the skyline be well screened.
Langho Parish Council (Langho PC1)	Support for the approach of the Council in not pursuing specific sites in the Langho area put forward at the "Call for Sites" stage. Support for the proposals for additional open space sites (OS1) at Brockhall and Langho. The PC is also keen to see land at Longworth Road Bilington protected from development because of flooding issues. The PC supports provision of employment sites especially the brownfield site at TIME (Simonstone)
Ribchester Parish Council (Rib PC1)	Objection to the employment allocation at Higher College Farm EAL3 and consider the plan is not sound because it fails to take account of the negative effects of the development summarised as: transport and highway impacts; visual and environmental impacts; possible pollution of local

	watercourses. Considers the proposed site is removed.
Barrow Parish Council (Bar PC 1)	Supports assertion that the housing allocation in Barrow has been satisfied. Supports the commitment to promoting employment opportunities at the Barrow Enterprise Park. Consider that the DPD does not recognise the importance of flood risk management within Barrow.
Chatburn Parish Council (Chat PC1)	Supports proposed settlement boundary for Chatburn and recommendations in the document.
Whittingham Parish Council (Whit PC1)	Concerns about impact of growth in Preston on Whittingham. Insufficient consultation between Ribble Valley, Preston CC and the parish council. Concerned to ensure local roads and infrastructure will be improves rather than contributions being spent county wide. The PC would like to see a masterplan showing development sites, infrastructure improvements and preferred access. Objection to Higher College Farm allocation (EAL3) due to major traffic impact on Whittingham area.
Hothersall Parish Council (Hoth PC1)	Objects to EAL3. Considers there is no evidential need, allocation of this site would allocate more than is needed, the choice of the site, the impact on its character and concerns relating to the deliverability of the site and therefore considers it is unsound. Windfall development would suffice. Consider that recent approvals have reduced the over residual need. Concerns over traffic impact, (and traffic impact on the school) public rights of way and the AONB as well as BHSs and flooding concerns.
Mellor Ward Councillor	Supports HAL1.
Rimington Ward Councillor	Considers that there are inaccuracies in the Sport England evidence document that in part underpins the Open Space and recreation Topic Paper.
Chatburn Cllr 1	Considers that the HED DPD will help to complete the LDF for the area. Fully support the new settlement boundary fort Chatburn.
Home Builders Federation (HBF)	Objects to approach to housing allocations. Plan considered unsound (not effective or positively prepared) due to lack of flexibility in meeting housing requirement. Buffer should be larger. Questions the 5-yr supply.
CPRE	Considers there is a justification to plan for a reduced number of homes. Requests that DS1 is referenced to encourage use of Previously developed land instead of greenfield. Advocate

	masterplanning of HAL1 and HAL2 to ensure green infrastructure and open space. Should be protection for trees, hedgerows flood risk and ecology.
Sport England (Spen 1)	Recommend additional wording to Policy OS1. Consider a link to the Council's evidence base on open space, sport and recreation. Considers there to be an evidence gap.
Barrow resident	General regret at perceived over development of Barrow due to permissions already granted.
Read and Simonstone resident (Read and S res resp 1) obo "Hammond Ground Residents' Group"	Support the proposed settlement boundary for Read and Simonstone and non-allocation of Hammond Ground site.
Newton resident (Newton res resp 1)	Objects to designation of DMB 4 Open Space site on his property at Lowood and attaches evidence of lack of public access.
Clitheroe resident (Clith res 1)	Objects to the granting of permission for housing at Waddow View. Feels that it should have been refused due to impact on wildlife, traffic, air pollution.
Clitheroe resident (Clith res 2)	Feels that, due to poor access, there should be no further development in that part of Clitheroe to the west of the railway line until better access supplied.
Clitheroe resident (Clith res 3)	Response relates to town centre boundary and settlement boundary for Clitheroe. Settlement Boundary should be redrawn to allow potential future development and address housing delivery issues.
Clitheroe resident (Clith res 4)	Settlement boundary should be amended to take account of dwelling under construction adjacent to the Black Horse Inn at Pimlico
Langho landowner (Langho site 1)	Proposes a housing site near to Langho
Longridge resident (Long res 1)	Objects to HEDPD on the following grounds: houses already permitted are over-priced in relation to needs of local people; there are no Traveller Sites on the Proposals maps; local roads are inadequate. Also objects to EAL 3 feels that there are more appropriate sites in Preston. Also feels that the plan is too dependent economically on the success of the BAe site at Samlesbury
Longridge resident (resident Willows Park)	Asserts that site 37 in the RVBC SHLAA of 2009 is unavailable for development due to restrictive land ownership issues. No allocation of this site is proposed within the HEDPD.
Chatburn resident (Chatsby res resp 1)	Supports proposed Chatburn settlement boundary

Chatburn resident (Chatsby res resp 2)	Support the revised settlement boundaries. These boundaries will protect the Ribble Valley from over development and specifically will keep Chatburn's rural identity.
Tosside resident (Tosside res 1)	Feels that the current methodology for calculating housing need nationally is flawed. Also feels that Neighbourhood Plans are exploiting errors in the system to develop rural greenfield sites. Goes on to criticise the developing Bolton by Bowland and Gisburn Forest Neighbourhood Plan.
Whalley resident (Why res 1)	Objects to any more development in Whalley on the grounds of flood risk and impact on wildlife partly in relation to the Accrington Road permission.
Wilpshire resident (resident Wilpshire 1)	Supports HAL2 Also feels that adjacent boundary with Blackburn needs clearly marking.
Wilpshire resident (HAL2 resident resp 1)	Objects to HAL2 on grounds of impact on schooling; traffic generation; access, drainage and impact on wildlife.
Wilpshire resident (HAL2 resident resp 2)	Supports HAL2 but feels that only a (unspecified) part should be considered. Also feels that the southern wooded area south of pylons should be retained as a visual buffer with Blackburn
Wilpshire resident (HAL2 res resp 3)	Objects to HAL 2 on the grounds of impact on local wildlife and environment.
Wilshire resident (HAL2 res resp 3 additional)	Considers plan is unsound (not justified or effective). Object to inclusion of woodland at southern end of HAL2; seeks its removal from the allocation.
Wilpshire resident (HAL2 resident resp 4)	Objects to HAL2 on grounds of impact on wildlife; traffic generation; poor local transport.
Wilpshire resident (HAL2 resident resp 5)	Objects to HAL 2 on the grounds of impact on local wildlife and environment; presence of pylons and water pipeline; drainage
Wilpshire resident (HAL2 resident resp 6)	Objects to HAL 2 on the grounds of: drainage, Minerals designation; impact on wildlife and environment; access, traffic generation, noise generation, presence of pylons and water pipelines, impact on local schools and presence of a former landfill site 250m away; impact on local house prices; relationship of size of site to Wilpshire's quoted housing need.
Wilpshire resident (HAL2 resident resp 7)	Objects to HAL 2 on grounds of impact on wildlife.
Wilpshire resident (HAL2 resident resp 8)	Objects to HAL 2 on the grounds of: traffic generation; access, pressure on local schools; drainage, impact on local wildlife.
Wilpshire resident (HAL2 res resp 9)	Supports HAL2. Would like to see the southern boundary of HAL2 reconsidered to prevent development right up to the BwD border. The

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

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

	exclude it from EN2 and DMB4 designations. Without modification the plan is considered unsound. Submission to be read in conjunction with one relating to adjacent land seeking allocation for housing (Ag 3). Employment land requirement should not be considered a maximum. The site is well located, sustainable and deliverable and would provide flexibility and choice for employment land.
Agent (Ag 6)	Plan is legally compliant and sound in relation to Employment Allocation EAL3 Higher College Farm
Agent (Ag 7)	Considers that the SA contains errors and errors in relation to the site details for Hammond Ground, Read. Disagrees with tight settlement boundary in Read. Needs clarification that the 5600 dwellings over the plan period is not a maximum as this is currently misleading.
Agent (Ag 8)	Object to HAL2 as not Sound (not positively prepared, Justified or Consistent with National Policy) as no reasoned justification for progressing Wilpshire 3 is given. Considers that the SA contains errors. Needs clarification that the 5600 dwellings over the plan period is not a maximum as this is currently misleading.
Agent (Ag 9)	New site submitted at Langho. Noted.
Agent (Ag 10)	New site submitted at Clitheroe. Noted.
Agent (Ag 11)	Proposes additional employment site in Clitheroe (Land off Lincoln Way). Considers that SA omits information.
Agent (Ag 12)	Proposes additional employment site in Clitheroe (abutting Salthill Industrial Estate). Considers that SA omits information.
Agent (Ag 13)	Considers that HED DPD is only planning to meet the minimum requirements and should plan for more. All sites within or on the periphery of all settlements should be allocated. Site submitted on Longridge boundary. Consider that there are anomalies with the settlement boundary topic paper. Includes plans for areas consider should be in the settlement boundary.
Agent (Ag 14)	Considers that HED DPD is only planning to meet the minimum requirements and should plan for more. All sites within or on the periphery of all settlements should be allocated. Site submitted in Mellor Brow.
Agent (Ag 15)	Consider should allocating additional sites.
Agent (Ag 16)	Pleased with settlement boundary for Barrow. Considers more provision should be made for hosing to deliver the 5,600 units. Objects to identification of allotments on Barrowlands site-

	request amendment to Proposals Map. OS1 should be based upon a robust assessment to be sound. OS1 wording is inconsistent with NPPF para 74 – alternative wording is suggested.
Agent (Ag 17)	Suggests boundary at Dale View, Billington be amended to take potential flood risk into account. Proposed alternative boundary provided.
Agent (Ag 18)	Submits site at Copster Green for allocation.
Agent (Ag 19)	Submits site in Gisburn for allocation for housing.
Agent (Ag 20)	Supports settlement boundary amendment.
Agent (Ag 21)	Support the inclusion of ‘committed’ housing sites on the Proposals Map. Couldn’t see the draft Proposals Map as part of the Reg 19 consultation. Expect to see a composite Proposals Map at submission stage. Considers that more than the minimum housing requirements should be planned for and should have ‘reserve housing sites’. 20% buffer should be included. Have undertaken own SA Scoring. Puts forward a site for housing (HLM land phases 2-4).
Agent (Ag 22)	Supports HAL2. Considers that should plan for more than the minimum housing requirement and submits a scheme for HAL2 for 120-140 dwellings. Suggests policy wording amendments.
Agent (Ag 23)	Site at Grimbaldston Farm has been deferred and delegated for P&D committee and should therefore be included within the defined settlement boundary of Longridge.
Agent (Ag 24)	Suggests amendment to settlement boundary at Dale View, Billington to consider potential concerns over flood risk. Concur with representation Ag 17.
Agent (Ag 25)	Submitting a housing site at Copster Green (a resubmission of Reg 18 representations).
Agent 26 (Ag 26)	Plan considered unsound, not positively prepared. Council’s approach of meet minimum housing requirements and seeking allocations in settlements with residual requirement is fundamentally flawed and will fail to deliver requirement. Additional suitable sites should be allocated including within Barrow. Specific site suggested.
Agent 27 (Ag 27)	Plan considered unsound (not justified, consistent with national policy or positively prepared) in relation to land at Mellor Brook. Settlement and Green Belt boundaries at Mellor Brook should be altered to include some modest housing and or employment development especially in vicinity of Mill Cottage.

Agent 29 (Ag 29)	Plan considered unsound (not justified, effective, consistent with national policy or positively prepared). Stonyhurst College and its estate should be included in Hurst Green settlement boundary and specific policy drafted for the college to recognise educational and ancillary needs including limited residential development.
Agent 30 (Ag 30)	Considers that the plan is not legally compliant or sound. Land at and adjoining the old Zoo at Brockhall Village should be included within the Settlement Boundary, not Open Countryside; it provides a good infill opportunity for residential development.
Agent 31 (Ag 31)	Considers plan is unsound (not justified). Settlement boundary at Osbaldeston is inconsistent with methodology. Considers it should be changed to include all properties physically linked to main part of settlement. Would allow for limited infill.
Agent (Ag32)	Considers plan is unsound (not justified, effective, consistent with national policy or positively prepared) in relation to employment land matters. Objects to deletion of Employment Allocation Option site 3 in favour of the adjacent site shown as EAL3 in the publication version of the plan. Objects to: approach of plan in only meeting minimum employment land requirement; inclusion of certain committed sites; spatial distribution of sites. Considers that more land should be allocated in Longridge. EAL3 should be deleted and replaced with allocation of 2.2ha adjacent site which is considered suitable, deliverable and sound.
Agent 33 (Ag 33)	Promotes allocation of additional housing site at Wiswell Lane, Whalley and related adjustment to settlement boundary.
Hothersall resident (Hoth 1)	Objects to EAL 3 on the grounds of being inappropriate within a rural area..
Hothersall resident (Hoth 2)	Objects to EAL 3 on the grounds of traffic and road safety and visual impact.
Hothersall resident (3017 Objector)	Objects to EAL 3 on grounds of: health and safety relating to road safety. Local roads already congested.
Hothersall resident (resident re BKW resp 1)	Objects to EAL 3 on the grounds of: increased traffic and road safety; impact on local views, effect on local school children, the lack of evidence that it will actually create genuinely new jobs.
Individual 1	Objects to EAL3 on grounds of impacts on ecology, woodlands (including ancient woodlands), damage

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

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

	College Farm EAL3 on basis of: site is located in AONB and tourist area; it is too close to schools and houses; increase in traffic and pollution leading to greater danger; local roads are inadequate for heavy traffic and large vehicles.
Resident (EAL3 res resp 10)	Object to EAL3. Highway and traffic concerns.
Resident (EAL3 res resp 11)	Highway and traffic concerns. No evidence for employment land- there is a surplus. Flooding concerns in relation to Longridge.
Resident (EAL3 res resp 12)	Considers there to be little evidence of need for new employment land. Site has poor access. Process has been badly handled.
Resident (EAL3 res resp 13)	Object to EAL3 due to traffic concerns and effect on health and St Michaels Primary school. The Core Strategy highlights A59 as a suitable location for Industry.
Resident (EAL3 res resp 14)	Object to EAL3 due to impact on tourism, AONB and open countryside, traffic, pollution, effect on conservation sites and views from heritage sites. Also consider that there are empty units near motorways and the A59 corridor.
Resident (EAL3 res resp 15)	Object to EAL3. Highway safety concerns. Considers there to be existing units available. Raises concerns over impact on environment (including the AONB), past previous fatalities on the road in this location and impact on nearby school and residential amenity.
Resident (EAL3 res resp 16)	Objection to EAL3. Countryside and highways (congestion and safety) concerns.
Resident (EAL3 res resp 17)	Object to EAL3. Concerns relate to congestion and road safety and the need for large vehicles to pass through residential areas and past schools. Considers that there are existing employment sites more suitable. Concerned with impact on AONB and tourism.
Resident (EAL3 res resp 18)	Objects to EAL3. Considers the evidence to be out of date and unsound. Concerns relate to traffic, the safety of site access impact on public rights of way.
Resident (EAL3 res resp 19)	Object to EAL3. Concerns over impact on BHSS, impact on AONB (views in and out), tourism, traffic (pollution, HGV disturbance, impact on conservation areas and historic villages and congestion, previous fatalities and impact on nearby schools). There are alternative units available and consider that there is no residual requirement for employment land.
Resident (EAL3 res resp 20)	Objects to EAL3. Concerns over impact on pollution, noise, use of greenfield land, impact on rural character, previous accidents on the road,

	distance from the M6 and the poor road surface quality.
Resident (EAL3 res resp 21)	Object to EAL3. It was not shown in the Core Strategy. If employment land was needed why has this not been earmarked? Longridge has town centre has premises available. Concerns over impact on open countryside, heritage sites, tourism, AONB, traffic, flooding, traffic passing schools, pollution. Appears to be a lack of communication between authorities.
Resident (EAL3 res resp 22)	Object to EAL3. Concerns with traffic, environment (AONB and biological sites) and character on the open countryside. Considers there are sites closer to the motorway. Hothersall was not represented on the Proposals Map at Reg 18.
Resident (EAL3 res resp 23)	Object to EAL3. Concerns over traffic congestion, disruption to residents, esp. on route to Motorway. Concern relating to previous fatalities and collisions. Considers that there are alternative sites already available such as Red Scar.
Resident (EAL3 res resp 24)	Objects to EAL3. Concerns over size of development, rural location, out of character and AONB impact. Close to BHS. Concerns over traffic, schools, access to motorway, tourism, previous accidents. Industrial land is available at Red Scar.
Resident (EAL3 res resp 25)	Objects to EAL3. Concerns over use of greenfield land, consider there is no evidence of need/ demand. Empty existing premises in Longridge. Concerns over impact on AONB, traffic, flooding, impact on schools, and pollution.
Resident (EAL3 res resp 26)	Objects to EAL3 on grounds of impacts on: natural beauty; wildlife; appearance; tourism; highways and traffic; pollution and health.
Resident (EAL3 res resp 27)	Comments relate EAL3 and soundness of plan with reference to justified, effectiveness and positively prepared. Question whether the need for the allocation is justified; detrimental impacts on tourism, recreation; concerns about highway safety, traffic and infrastructure issues.
Resident (EAL3 res resp 28)	Objects to EAL3 on grounds of: impacts on AONB and tourism; concerns about height, scale and materials; impacts on surrounding protected sites; highway and traffic impacts; and pollution from HGVs using site.
Resident (EAL3 res resp 29)	Objects to EAL3 on grounds of: proximity to protected heritage woodland, reservoir sites and AONB; impact on tourism, open fields; fear of future expansion,; highway and traffic impacts;

	increased pollution; visual impacts; and other more suitable sites available.
Resident (EAL3 res resp 30)	Objects to EAL3 on grounds of: distribution and manufacturing are inappropriate uses in rural area; highways, traffic, pollution and access concerns. More appropriate sites nearer M6 Junction 31a, M65 and the A59 corridor
EAL3 Ag 1	Objects to EAL3 due to poor site access and in an isolated location away from town centre. Consider there to be more suitable sites in Longridge though do not consider there to be a need/ no evidence base. The Core Strategy highlights the A59 corridor as the most suitable location for employment development. Some confusion between allocation and the application. Concerns over pollution and traffic impact on schools and heritage/ conservation areas. Site is remote from the M6. Site has poor local transport links. Concerns over road safety and previous fatalities. Concerns over impact on AONB.
Brockhall resident (Brok res 1)	Strong support for the allocation of five parcels of land within Brockhall village as open space. The play area, formal gardens and land along Old Langho Road frontage should also be allocated. Suggests additional wording to OS1.
Brockhall resident (Brok res 2)	Support for open spaces in Brockhall village to remain as open spaces for public use.

4. Issues from Individuals/ Residents and key figures

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

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

The comments received are summarised below by theme.

Infrastructure Issues

A number of responses were received concerned with the impact of development on local school pressures, traffic generation/ capacity/access

issues, drainage/ flooding issues, and the effect on local wildlife and trees. In many cases these were not directly linked to a specific proposed allocation site, and instead were related to the overall cumulative impact of the level of development that has taken place in the borough over recent years.

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

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

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

In terms of proposed allocations where there are currently no/ minimal utilities on site, this would be rectified as part of the development in the necessary infrastructure provided/ improvements made in consultation with the relevant authorities and providers and would not therefore preclude development.

A significant number of the responses from private individuals related to EAL3 (employment allocation at Higher College Farm). It is apparent that in some instances there has been some confusion between the proposed allocation (EAL3 set out in the HED DPD) and application 3/2017/0317 which is currently being determined by the Council. Where comments have related to both sites, the representation has been forwarded to the Case Officer dealing with the planning application to ensure the comments are taken into consideration in the determination of the application. Many of the issues are applicable to both the application and the proposed allocation EAL3. The most common theme related to the highway/ traffic implications of the development in this location, with particular emphasis on concerns over increased pollution (and the associated potential health implications for local residents), noise and disruption

and impact on residential amenity and safety concerns in relation to HGV's on the minor/ country roads and potential impact on the children at the local schools (in terms of pollution, noise and highways safety). Concerns were also raised by individuals about the impact on the nearby AONB (in terms of views in and out), on the Open Countryside and the views from heritage sites and how this may potentially impact upon tourism. It was also stated on numerous occasions that the development of employment land would be best located along the A59 corridor in line with the Core Strategy and that there are currently vacant units available along the M6 motorway which would be more suitable. Concerns were also raised regarding existing business uses.

Use of Greenfield Land & Open Countryside

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

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

Proposals Map

A small number of representations were made by private individuals which related to the Proposals Map. There were a number of responses setting out their support for the Map and the revised settlement boundaries however one respondent stated that the presentation of Proposals Map could be improved as it contained hatching not shown in the key. All illustrative designations shown on the Proposals Map are present in the key. In addition, criticism was also given for not showing development on the Preston side of the Longridge boundary. However, this has not been shown on the Proposals Map as this falls within the borough of Preston City Council and will be shown on their Proposals Map.

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

Support for the HED DPD

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

Miscellaneous

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

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

Key statistics from Reg 19 consultation outcome

Total number of representations: 140.

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No of people wanting to speak at EiP: 22

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No of responses from specific consultees: 23 (16% of all responses)

- 10 specific consultee support
- 8 specific consultee objection
- 5 specific consultee general observations (not support or objection)

No of responses from Private individuals: 76 (54% of all responses)

- 12 support,
- 61 objections
- 3 general observations (not support or objection)

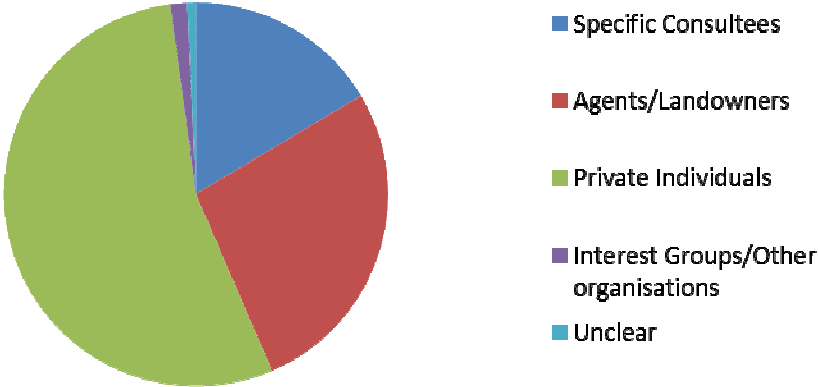
No of responses from agents/ landowners: 38 (27% of all responses)

- 5 support
- 32 objections

No of Interest Groups/ other organisations: 3 (2% of all responses)

- 0 support
- 3 objections

No of responses unclear: 1 (1% of all responses)



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No of responses received specifically in relation to employment land: 42 reps (30% of all reps received)

- In particular reps relating to Higher College Farm (Allocation EAL3): 41 reps (40 objections, 1 rep of support)

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Response to housing land allocations: 42 reps (30% of all reps received). 12 reps of support and 30 objections

- Specifically Wilpshire (Allocation HAL2): 25 reps - 10 supporting & 15 objections.

- Specifically Mellor (Allocation HAL1): 2 reps - 1 supporting & 1 objection.

--General queries criticising lack of 5 year land supply/ flexibility in the plan:

13 reps (9% of all reps)

--

Promotion of specific sites by landowners and agents: 16 sites in total (only 1 site in an area where we are looking for sites (Mellor) but site not appropriate so no sites being allocated.

- 12 residential sites
 - 4 employment sites
-

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No of identified changes around open spaces and settlement boundaries: 4 in total (2 settlement boundary changes and 2 open space changes)

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No. of identified changes to HED DPD ready for submission: 7 in total (2 to the HED DPD and 5 to the Proposals Map)

HED DPD: APPENDIX ONE

**RESPONSE FROM ARCADIS (UK) LTD TO
REPRESENTATIONS RECEIVED AT REG 19 (PUBLICATION)
STAGE IN RELATION TO THE SA AND HRA**

Ribble Valley Borough Council Sustainability Appraisal Consultation Response

<p>Natural England, 09/06/2017, 216970</p>	<p>With specific reference to the Habitats Regulations Assessment (HRA) Natural England would like to summarise that more information and explanation is required on how the conclusion of No LSE has been reached. The HRA states: <i>5.1.1 Each proposed development allocation has been checked for the likelihood of it leading to a significant effect on a European site, either alone or in-combination with other allocations within the same DPD or with other plans or projects. The detailed screening of the Ribble Valley HED DPD in relation to the European sites is presented in Table 7. Table 8 provides a summary of the screening in reference to the allocation sites.</i> However these tables do not show the individual allocations. There are no plan/site references included. This information needs to be included in order to be able to identify individual allocations and see how the conclusions have been reached for all the sites.</p>	<p>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>Natural England, 09/06/2017, 216970</p>	<p>The HRA continues: <i>5.2.6 It is assumed that all allocation sites with planning permission 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</i></p>	<p>Further explanation can be added to Section 5.2. This would include references to information from planning applications to confirm NLSE on European sites.</p>

	<p><i>Key Statement EN4 which provides for ensuring that negative impacts upon biodiversity through development are avoided (refer to Section 3.7).</i></p> <p>Natural England would like to see more explanation to support this.</p>	
<p>Natural England, 09/06/2017, 216970</p>	<p>Section 5 covers In Combination effects and states: <i>5.3.2 It is considered unlikely that there would be significant in-combination effects on European sites as a result of the development of the employment, housing and preferred option allocation sites listed with Ribble Valley HED DPD. In all instances where HRA has been undertaken, it was determined that there would be no significant effects on European sites either alone or in-combination with other plans or projects inside or outside of Ribble Valley.</i></p> <p>Natural England would like to see more evidence and explanation to support this conclusion.</p>	<p>Further explanation can be added to Section 5 to confirm the conclusions of project-level HRAs/consultation with respect to European sites for allocations in the planning system.</p>
<p>Natural England, 09/06/2017, 216970</p>	<p>The following paragraph taken from the HRA is placing reliance on any effects that are identified at project stage will be dealt with via a project level HRA. Natural England advises that further detail should be provided to explain how impacts can be avoided and/or mitigated at this stage. This will give a higher level of confidence that the allocations can be developed without resulting in LSE on European sites and are therefore deliverable.</p> <p><i>5.3.3 The only sites where in-combination effects cannot be ruled are those which have not yet been through the planning system [i.e. the option sites]. However, in order to comply</i></p>	<p>Further explanation can be added to Section 5 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.</p> <p>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><i>with Key Statement EN4 within the Core Strategy, projects with the potential for significant effects upon a European site would require a project-specific HRA, and therefore any in combination effects that could arise from these developments would need to be appropriately mitigated in order for planning consent to be granted.</i></p> <p>Before Natural England can agree with the conclusions reached, we would like to see more evidence and explanation to support the view of the conclusions of the HRA are robust enough to ensure that the proposals are unlikely to have any significant effects on the European Sites identified, either alone or in combination with any other plans and projects.</p> <p>All the allocations need to be individually identified in the HRA and specifically in tables 7 and 8. We recommend that you send a clear map with all the allocations and their references so there is a clear audit trail that they have all been assessed both alone and in combination.</p>	
Pegasus Planning	It should also be noted that the Carr Hall site is located within the Green Belt, which does not feature as an Issue In the SA, yet is clearly a significant material planning consideration.	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.
Dickman Associates, 08/06/2017, Numerous Documents	The Arcadis Sustainability Appraisal non-technical summary is dated Jan 2017 yet the full document is dated March 2017. It appears the non-technical summary relates to the previous SA.	The SA NTS is up to date – changes to the main SA Report made between January and March did not require changes in the NTS.
Dickman Associates, 08/06/2017,	The Arcadis Sustainability Appraisal report (March 2017) at Table 3.2 refers to EU	To speculate on the impact that Brexit may or may not have on current EU

<p>Numerous Documents</p>	<p>Directives but not if or how Brexit will affect these.</p>	<p>Directives that are transposed 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.</p>
<p>Dickman Associates, 08/06/2017, Numerous Documents</p>	<p>Table 5.1 only identifies Clitheroe and Longridge as the main urban centres whereas in the adopted Core Strategy (RVCS) Whalley is included in the list of main centres.</p> <p>They then suggest a target of 100% of new development be on PDL when that is one thing RVBC area distinctly lacks.</p>	<p>Comment regarding main centres noted and can be amended.</p> <p>The target of 100% of new development be on PDL is taken directly from the Ribble Valley Annual Monitoring Report 2016 and therefore is considered consistent with the Council's targets.</p>
<p>Dickman Associates, 08/06/2017, Numerous Documents</p>	<p>Appendix B reiterates the comment that Clitheroe and Longridge are the main settlements and even goes on to note Whalley and Sabden are large villages. Whereas the adopted Core Strategy key statement DS1 includes Whalley as a main settlement and Sabden as a Tier 2 village.</p>	<p>Whilst this does not materially affect the outcomes of the SA, the terminology can be made more consistent.</p>
<p>Dickman Associates, 08/06/2017, Numerous Documents</p>	<p>Figure B-1 of Appendix B refers to the NE of England whereas Lancashire is in the NW. Maybe a typo like the inclusion of a drive time for 3 airports but only 2 are then mentioned... Possibly Liverpool is the one they forgot?</p>	<p>This can be amended.</p>
<p>Dickman Associates,</p>	<p>Table 2 is missing in Appendix B.</p>	<p>This can be amended.</p>

08/06/2017, Numerous Documents		
Dickman Associates, 08/06/2017, Numerous Documents	The pages in all the Appendices to the SA are unnumbered.	This is correct.
Dickman Associates, 08/06/2017, Numerous Documents	Appendix B has the following unfinished sentence: <i>'118 new dwellings permitted completed on previously developed land out of'</i>	This can be amended.
Dickman Associates, 08/06/2017, Numerous Documents	Appendix E is not included.	Heading is missing for Appendix E although the appendix itself is included – This can be amended.
Dickman Associates, 08/06/2017, Numerous Documents	Arcadis in their assessment consider Wilpshire and Langho as a defined area and Billington and Whalley as an identified area whereas the Core Strategy and Housing Needs Assessments of RVBC actually group these aforementioned settlements as Whalley a main settlement (not a large village); Wilpshire as a Tier1 settlement assessment on its own for Housing Needs Purposes; Langho and Billington are combined as another Housing Needs Area. Arcadis also then assume a single Housing Needs assessment across the RVBC area whereas the Council's approach is to look on a settlement by settlement basis occasionally combining 2 settlements.	The SA intends to be consistent with the Council's approach to defining settlements and housing needs. If clarity is required this can be added.
Dickman Associates, 08/06/2017, Numerous Documents	Appendix A makes no mention of the Housing White Paper so raising the question as to how up to date is this background paper.	This can be amended.
Dickman Associates, 08/06/2017, Numerous Documents	Appendix in the summary sheet for Whines Lane, Read: 'Site is one of five sites in Balderstone, Read and Simonstone all of which are in close proximity to each other.'	There is no reference to Balderstone being in close proximity to Read and Simonstone. Balderstone has been grouped with Mellor and

	Balderstone is near Salmesbury not Read/Simonstone.	Osbaldeston for the sake of the cumulative assessment of developments given the relative close proximity of these smaller settlements.
Dickman Associates, 08/06/2017, Numerous Documents	Site area shown for Hammond Ground as 20.06ha is incorrect. The correct area is 4.09ha and the number of units is 50.	This can be amended.
Dickman Associates, 08/06/2017, Numerous Documents	Hammond Ground lies in the SE corner abutting the settlement boundary. We disagree with the results of the SA topic survey for the site which has considered a totally different and incorrect site area and has paid no heed whatsoever to the information submitted on the call for sites form nor with the planning application that show green infrastructure and biodiversity are maintained and also includes an LVIA. Had the correct site area been used then this would show that the site is not within 300m of a Listed Building nor is it within 100m of an existing water body. It would also have shown that there has already been an FRA assessment and a SuDs solution as well as the proposed extent of the green infrastructure on the very low density scheme. The site is within the Read/Simonstone area which includes the employment sites at Time Technology Park so offering new homes to those in the employment area amongst others.	<p>The correct area boundary was used during the SA, however the site area will be amended.</p> <p>With the 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.</p> <p>The information provided at the call for sites stage has not been made available for the SA.</p> <p>When searching for the planning application (3/2015/0974) this information is also not readily available.</p> <p>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.</p>
Geoff Dawson, 06/06/2017	The SA Non-Technical Summary statements included are spurious.	Reference to sustainable transport links is based upon the existence of the

	E.g. The site is NOT served by sustainable transport links. The bus service is infrequent and inadequate and was very nearly terminated altogether in the last round of Council cuts. They plan for users to come by car.	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.
Geoff Dawson, 06/06/2017	The SA assessment states that it will have no discernible impact on employment in Longridge. Longridge has massive employment opportunities 10 mins away by the motorway.	The text on this matter can be revisited to confirm the meaning and rational for this statement.
Geoff Dawson, 06/06/2017	On Page 1, Para 1.2 the document states a basic goal “people enjoy a better quality of life, without compromising the quality of life for future generations” Policy EAL3 – Land at Higher College Farm, and the Tootle Green housing development are completely contrary to this goal. Increased numbers of HGV’s destroying the roads, shaking peoples’ homes and waking them from their sleep is the destruction of quality of life. Superb meadow land has been destroyed by the Tootle Green development (photos can be supplied) and EAL3 will destroy more. The whole character of Longridge, a pleasant environment where people live and can walk their dogs beside open countryside, will be destroyed.	The SA identifies a range of potential effects including cumulative. Note that quality of life also includes provision of good quality housing.
Geoff Dawson, 06/06/2017	EAL3 - Land at Higher College Farm, is a habitat for Curlews. These are now an endangered species – they are on the RSPB’s RED LIST.	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.
Geoff Dawson, 06/06/2017	It is not served by sustainable transport links. The bus service passing it is infrequent.	More specific recommendations can be included in liaison with the

	<p>Here is an up-to-date statement from an LCC Highways Development Control Officer (David Bloomer) relating to the adjacent BKW development proposal</p> <p>As well as the issues with the site access, the submitted application does little more than advise on the sustainable links to the site with no suggested improvements. Public transport past the site is infrequent and does not offer a viable alternative travel option. The bus stops would need to be relocated and improved. For pedestrians there will inevitably be a need to cross Blackburn Road, no improvements have been suggested.</p> <p>I would also be concerned about the safety record at the Blackburn Road/ Preston Road/ Lower Road junction (adj Corporation Arms) There have been a number of recorded injury accidents at this junction which would need to be considered as it is anticipated that the development would increase the number of movements through this junction. Of particular concern would be the safety of cyclists.</p>	<p>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.</p>
<p>Geoff Dawson, 06/06/2017</p>	<p>There is no mention at all in the Sustainability Assessment of the resultant increase in HGV's and speeding vans</p>	<p>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>

HED DPD: APPENDIX TWO

EVIDENCE OF REGULATION 19 CONSULTATION/ INVITATION FOR COMMENT

Clitheroe Advertiser press article (printed in issue No: 6,991 on Thursday 11th May 2017)

Residents views are sought on council's housing and economic development plan



Residents in Ribble Valley are invited to have their say on proposed housing and economic development sites in the borough.

By
JULIE MAGEE
[Email](#)

Published: 15:31 Tuesday 09 May 2017

Residents in Ribble Valley are invited to have their say on proposed housing and economic development sites in the borough.

Ribble Valley Borough Council's housing and economic development plan document has been published for consultation until Friday, June 9th.

The document, or DPD, outlines land set aside for housing and economic development in the borough and will be used to determine planning applications until 2028.

The DPD also outlines work undertaken on retail and town centre boundaries, open space designations and revised settlement boundaries, as well as where development is likely to take place, including committed sites and a small number of new allocations, although it is not a review of the Core Strategy.

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<http://www.clitheroeadvertiser.co.uk/news/residents-views-are-sought-on-council-s-h...> 12/05/2017

The views of residents are sought on the document before it is submitted to the Government for consideration.

The document can be viewed at ribblevalley.gov.uk or the Ribble Valley Borough Council Offices, Clitheroe, from Monday to Friday, 9am to 5pm. It can also be viewed at Clitheroe, Longridge Libraries, the Civic Hall and the Station Buildings in Longridge.

Comments should be e-mailed to publicationreg1@ribblevalley.gov.uk or posted to DPD Forward Planning Team, Ribble Valley Borough Council Offices, Church Walk, Clitheroe, Lancashire, BB7 2RA, by 5pm on June 9th.

Further details are available from Ribble Valley Borough Council's forward planning team on 01257 425111.

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If I have made comments previously do I need to make them again?

Comments made at the previous stage are not automatically considered by the Inspector. If you consider that your comments made previously remain valid, you need to submit them again. All representations received at this stage will be submitted with the plan for independent examination at the next stage.

How do I make my response?

You can email your comments to publicationreq19@ribblevalley.gov.uk or alternatively, you can send them by post to:

HED DPD Consultation
Forward Planning
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA

When must I respond by?

Responses must be received by the Council by 5pm on Friday 9th June 2017. Responses received after this deadline WILL NOT be considered.

What if I want to discuss the documents with a Planning Officer?

You can call 01200 425111 to make an appointment if you wish to discuss the documents with a planning officer. Please ensure an appointment is made to ensure that an officer is available.

I don't want to be informed about this plan anymore.

If you no longer wish to be contacted about the plan, you can email your contact details to publicationreq19@ribblevalley.gov.uk or tell the Contact centre and we will remove your details from the database.

**Town and Country Planning (Local Planning) (England)
Regulations 2012³: Notice of Consultation**

**Statement of Representations Procedure
A Local Plan for Ribble Valley 2008 – 2028: Housing and Economic
Development- Development Plan Document (HED DPD)**

**This statement is prepared pursuant to Regulations 17 and 19 (a) of the
Regulations 2012.**

The subject matter of, and area covered by, the local plan:

The Housing and Economic Development DPD primarily allocates land for housing and for economic development purposes, but also updates other development constraints and designations and incorporates work that has been undertaken on retail/ town centre boundaries, existing open space designations and revised settlement boundaries. All of this work has been used to prepare the DPD which, along with the Core Strategy, will be used to determine planning applications and to guide development. The plan will apply to the whole Borough.

**Representations about the Housing and Economic Development DPD must be
received by:**

5.00pm on Friday 9th June 2017.

The address to which representations must be made is:

HED DPD Reg 19 Publication consultation
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA

Representations may be made in writing to the above address or electronically by:

- Downloading and completing the on-line consultation feedback form available at www.ribblevalley.gov.uk (follow the link to the HED DPD); or
- email to publicationreg19@ribblevalley.gov.uk

A response form is available to download at www.ribblevalley.gov.uk (follow the link to the HED DPD), at inspection points or by request from 01200 425111.

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- (i) the submission of the HED DPD for independent examination under Section 20 of the Act,
- (ii) the publication of the recommendations of the person appointed to carry out an independent examination of the HED DPD under section 20 of the Act, and
- (iii) the adoption of the HED DPD.


Marshal Scott
Chief Executive
Ribble Valley Borough Council
28th April 2017

³ Town and Country Planning (Local Planning) (England) Regulations 2012 (as subsequently amended)

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For official use	Ref. No.
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Ribble Valley Housing and Economic Development - Development Plan Document (HED DPD)



Regulation 19 (Publication) comments response Form

Before using this form to make any comments please ensure that you have read the Housing and Economic Development – Development Plan Document and the Guidance Notes, which can be found on Ribble Valley Borough Council's website - www.ribblevalley.gov.uk and follow the HED DPD.

If after reading the Guidance Notes you should have any queries in completing the form please telephone 01200 425111.

This form has two parts: -

Part A - Personal Details (you need only complete one copy of Part A)

Part B - Your comment(s) (Please complete a separate Part B for each comment you wish to make.)

All completed comments forms must be received by the Council no later than 5:00pm on Friday 9th June 2017.

Please return paper copies marked 'HED DPD PUBLICATION CONSULTATION' to Council Offices, Church Walk, Clitheroe, BB7 2RA

Part A

Q1 Please can you provide the following information which will assist us in contacting you if we need to discuss any of your comments further.

Name	<input type="text"/>
Name of Organisation (if you are responding on behalf of an organisation)	<input type="text"/>
Database Reference number (if you have one)	<input type="text"/>
Address	<input type="text"/>
Post Code	<input type="text"/>
Email Address	<input type="text"/>
Phone number	<input type="text"/>

Copies of all comments made in Part B of the form will be put in the public domain and are not confidential, apart from any personal information. All personal information within Parts A and B will only be used by the Council in connection with the Local Development Framework and not for any other purpose and will be held in accordance with the Data Protection Act 1998. The Council will summarise the comments and all representations will be made available to the Planning Inspectorate.

Part B

Please use a separate form for each individual comment.

Q2

Name / Name of Organisation (if you are responding on behalf of an organisation)

Q3

To which part of the HED DPD does this comment relate?

Part of document e.g. Housing allocations, open space policy etc...

Paragraph No.

Q4

As a consequence do you consider the HED DPD is:

i) Legally compliant

Yes

No

ii) Sound *

* The considerations in relation to the HED DPD being sound are explained in the Guidance Notes

Q5

If you consider the HED DPD is unsound, is this because it is not... (please tick the appropriate box)

Justified

Consistent with national policy

Effective

Positively prepared

Q6

Please give details of why you consider that the HED DPD is not legally compliant or sound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the HED DPD, please also use this box to set out your comments. Please continue on a separate sheet if required.

Q7 Please set out what change(s) you consider necessary to make the HED DPD legally compliant or sound, having regard to the test you have identified at Q5 above where this relates to soundness.

You will need to say why this change will make the HED DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible. *Please continue on a separate sheet if required.*

Please note: your comment should cover succinctly all the information, evidence, and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be another opportunity to make further comments based on the original comment made at the publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination in the forthcoming Examination in Public. Please note also that the Inspector is not obliged to consider any previous comments that have been made in respect of the HED DPD. You are urged, therefore, to re-submit on this form any previously submitted comments that, in your view, remain valid and that you wish the Inspector to consider.

Q8 If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I do wish to participate at the oral examination

Q9 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. *(Please note that the Inspector will determine who participates.) Please continue on a separate sheet if required.*

Q10 If you wish to be kept informed as the HED DPD progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the box(es) below.

- Submission of the HED DPD to the Secretary of State for independent Examination
- The publication of the Inspector's report following the Examination
- The formal adoption of the HED DPD

Q11 If you have any other comments to make on the HED DPD that have not been covered elsewhere, please use the box below. *Please continue on a separate sheet if required.*

Q12 Date of completion: _ _ / _ _ / _ _ _ _

Q13 Signature

Thank you very much for taking the time to complete this comments form, your comments are very much appreciated.

If after reading the Guidance Notes you should have any queries in completing this form please telephone 01200 425111

**HOUSING AND ECONOMIC DEVELOPMENT – DEVELOPMENT PLAN
DOCUMENT: PUBLICATION VERSION (REGULATION 19) CONSULTATION
GUIDANCE NOTES TO COMMENTS FORM**

Introduction

This Housing and Economic Development Publication Version development plan document (HED DPD) has been published so that comments and representations can be made on it. Any such comments will be submitted with the document to the Secretary of State who will then appoint an independent Planning Inspector to examine the plan in an Examination in Public. The purpose of this examination will be to consider whether the HED DPD complies with a set of legal requirements and is "sound".

Legal Compliance

The Inspector will consider whether the document meets the legal requirements under s20(5)(a) of the Planning and Compulsory Purchase Act 2004 before moving to the various tests of soundness.

You should consider the following before making a representation on legal compliance:

The HED DPD should be within the [current Local Development Scheme \(LDS\)](#) and the key stages should have been followed. The LDS is the Council's programme of work setting out which DPDs it wishes to produce over a three year period. The Council keeps the LDS under review with updates regularly published. The process of involving the community in the development of the document should be in general conformity with the Council's [Statement of Community Involvement \(SCI\)](#). This sets out the Council's strategy for involving the community in the preparation and revision of Local Development Documents such as the Core Strategy and the HED DPD (The Local Plan).

The document should comply with the [Planning and Compulsory Purchase Act 2004](#) and the Town and Country Planning (Local Development)(England Regulations) 2004 (as amended, including the [amended Regulations of 2016](#), which came into force on 1st October 2016). On publication the Council must publish the documents set out in the regulations and make them available at its principal offices and on its website. It must also inform all those bodies required by regulation and any persons who have requested to be notified.

The Council is required to produce a Sustainability Appraisal (SA) report to accompany the HED DPD which will describe the process through which the SA has been carried out and the baseline information that has informed the process and its outcomes. SA is a tool for appraising policies to ensure that they best reflect social, environmental and economic factors.

The Council has a duty to co operate on planning matters that cross administrative boundaries and in preparing the HED DPD it needs to work collaboratively with other bodies to ensure that strategic priorities are clearly considered.

In addition the document must have regard to the National Planning Policy Framework (NPPF) and the [Planning Practice Guidance \(PPG\)](#).

Tests of Soundness

The current definitions of soundness are laid out in para 182 of the NPPF, which is set out in full below:

"The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."

General Advice

If you wish to make a representation seeking a change to the HED DPD or a part of it you should make clear in what way it is not sound having regard to the legal compliance checks and the four soundness tests outlined above. You should try to support your representation with evidence showing why the document should be changed. It would also be helpful if you could also say precisely how you think the DPD should be changed. Representations should cover concisely all the information, evidence and supporting information necessary to support/justify your representation and the suggested change as there will not normally be a subsequent opportunity to make further submissions based on the original representations made at this stage. After this stage further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for Examination at the Examination in Public of the document later this year.

The Inspector may choose to call people to present their views verbally in the Examination, though this is at the Inspector's discretion. If you think that you would wish to participate in such a way then you should indicate this in Question 8 of the form.

Please note that the Inspector is not obliged to consider any previous representations that have been made about the HED DPD. You are urged, therefore, to re-submit on copies of the form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.

END.

master copy

FINAL



Ribble Valley
Borough Council

www.ribblevalley.gov.uk

RIBBLE VALLEY BOROUGH COUNCIL

With Compliments

Dear Sir or Madam,

Enclosed is a list of planning consultation documents to be made available for inspection by the general public for a six week period from **Friday 28th April until 5pm on 9th June**. Please ensure that the documents are available to view during this consultation period.

Please find enclosed the following documents:

- A covering letter providing details of the consultation;
- Availability of Documents Schedule and Statement of representations Procedure;
- The Regulation 19 Publication consultation report of the HED DPD
- Approach to plan preparation document;
- Infrastructure Delivery Plan;
- The Resultant Changes to the draft Proposals Map;
- The Sustainability Appraisal and Habitats Regulation Assessment (Non-Technical Summaries);
- Consultation response forms and Guidance Notes (more copies are available on request or can be downloaded from www.ribblevalley.gov.uk); and
- A poster for you to display providing details of the consultation.

If you require any further information please contact the Forward Planning team on 01200 425111 or email Publicationreg19@ribblevalley.gov.uk

Many thanks for your assistance,

Regards,

RVBC Forward Planning team.

Council Offices
Church Walk, Clitheroe
Lancashire BB7 2RA

Tel: 01200 425111
Fax: 01200 414888
DX Clitheroe 15157

Chief Executive:
Marshal Scott CPFA
Directors:
John Heap B. Eng. C. Eng. MICE
Jane Pearson CPFA

(went to libraries (x3) and Longridge buildings (x2))



RIBBLE VALLEY BOROUGH COUNCIL

please ask for: Forward Planning
direct line: 01200 425111
e-mail: Publicationreg19@ribblevalley.gov.uk
my ref: HEDDPDPublication2017
your ref:
date: 28th April 2017

Council Offices
Church Walk
CLITHEROE
Lancashire BB7 2RA

Switchboard: 01200 425111
Fax: 01200 414488
www.ribblevalley.gov.uk

Dear Sir or Madam,

Ribble Valley Borough Council: A Local Plan for Ribble Valley 2008-2028
Publication of the Ribble Valley Housing and Economic Development –
Development Plan Document (DPD)

Dear Sir/Madam

Over the past few years, you, or your organisation, has expressed an interest in being consulted on the development of new planning policy that may have implications for the area in which you live or how you provide or access services.

I am now writing to inform you that the Publication Version of the Council's Housing and Economic Development- Development Plan Document (HED DPD) has been published for consultation along with accompanying reports during the six week period 28th April 2017 until 9th June 2017. The enclosed Statement of Representations Procedure and information on Availability of Documents set out the details of the consultation.

This is an important stage in the preparation of the Housing and Economic Development DPD. The consultation document represents the Council's preferred land allocations for the Borough up to 2028 and comments are now being sought in advance of submission of the document to the Secretary of State for independent examination. The document primarily allocates land for housing and for economic development purposes, but also updates other development constraints and designations and incorporates work that has been undertaken on retail/ town centre boundaries, existing open space designations and revised settlement boundaries. All of this work has been used to prepare the DPD which, along with the Core Strategy, will be used to determine planning applications within the Borough.

Please note this is not a review of the adopted Core Strategy. The HED document provides detail on where development is likely to take place and includes committed sites as well as a small number of new allocations.

You may have made comments at previous stages leading up to this latest document. These comments have informed the development of the HED DPD. It is important that you make your comments now on the Publication version of the DPD, as it is the comments made at this stage that will be considered by the Independent Inspector who will be appointed to examine the document. The Inspector will assess whether the plan has been prepared in accordance with:

Chief Executive: Marshal Scott CPFA
Directors: John Heap B.Eng. C. Eng. MICE, Jane Pearson CPFA.

- The Duty to Co-operate;
- Legal and procedural requirements; and
- whether it is "sound".

Further details on these issues, including "soundness" are provided in the Guidance Notes setting out how you should make your response are available on the Council's website at www.ribblevalley.gov.uk (follow the link to HED DPD). It would be helpful if you used the form provided on the website to make your comments on the HED DPD.

It is the Council's intention to submit the HED DPD subject to no fundamental issues being raised in relation to soundness, later this year for Examination.

Representations should be made **no later than 5pm on Friday 9th June 2017**. Representations received after this deadline will not be considered.

You may also make comments at this stage on the Sustainability Appraisal Report and Habitats Regulations Assessment by the same deadline.

The Council is also making available a Regulation 17 Consultation Statement and relevant evidence base and supporting documents.

Copies of this letter are being sent to all who have made representations at previous stages in the process or who have asked to be kept informed of the progress of the Local Plan. Where more than one letter is sent to the same address this is because more than one person has responded individually at previous stages. If you wish to combine contacts please let us know. Also let us know if your details are incorrect; need updating or you no longer wish to be kept informed. Furthermore, in order to minimise consultation costs, if you prefer to be contacted by email, please let us know so we can amend our details.

The Publication version of HED DPD can be viewed on the Planning Policy pages of the Ribble Valley website. There is a link to this page from the Council's homepage for ease.

Alternatively, the documents can be viewed during normal opening hours at:

Planning reception, Level D
The Council Offices
Church Walk
Clitheroe
BB7 2RA

Please telephone 01200 425111 to arrange an appointment if you wish to discuss these documents with an Officer.

They will also be available at the following locations during their normal opening hours:

- Clitheroe Library, Church Street, Clitheroe
- Longridge Library, Berry Lane, Longridge
- Mellor Library, St Mary's Gardens, Mellor

In addition the consultation documents will be available to view at the following locations during their normal opening hours:

- Longridge Civic Hall; and
- The Station Buildings, Longridge

Copies of documents can be made available at a charge. Please ask for further information.

Comments on the documents can be emailed to publicationreg19@ribblevalley.gov.uk or sent by post to HED DPD Publication Reg 19 consultation, Forward Planning, Council Offices, Church Walk, Clitheroe, Lancashire, BB7 2RA.

The closing date for comments is 5pm 9th June 2017

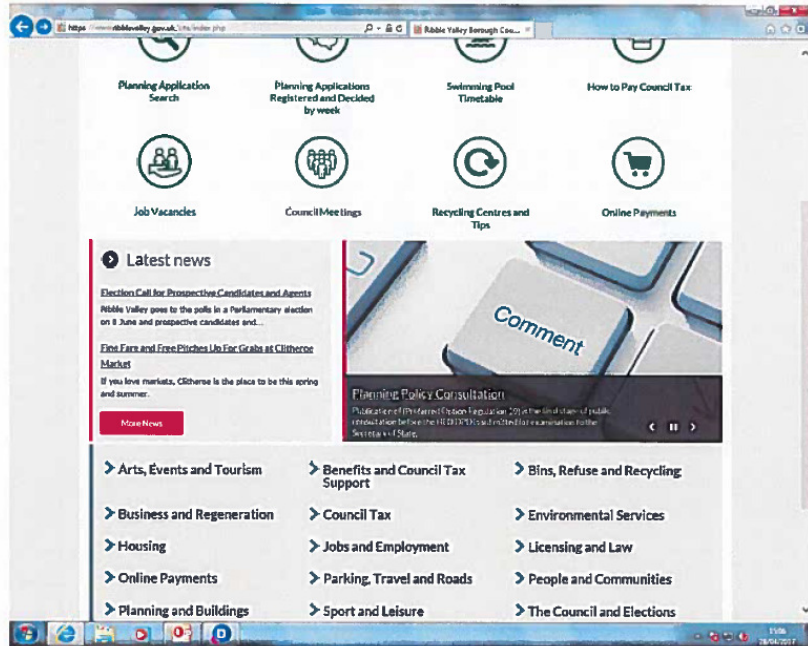
As the document progresses, if you wish to be informed of the outcome of the Examination, please contact us to inform us as we will not automatically send out letters to all our database contacts due to the cost implications.

Yours sincerely



Colin Hirst
Head of Regeneration and Housing.

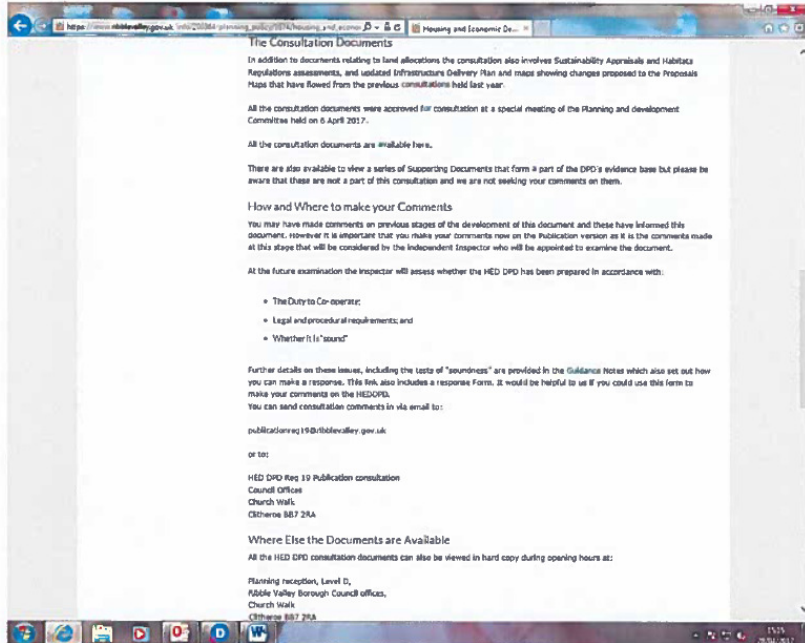
Website screenshots from start date of consultation Reg 19 Publication 28/04/17



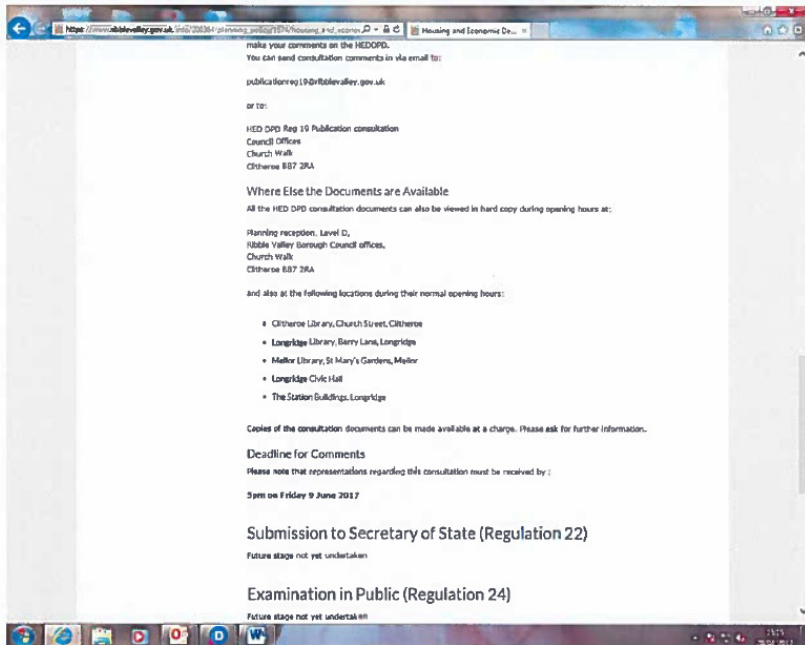
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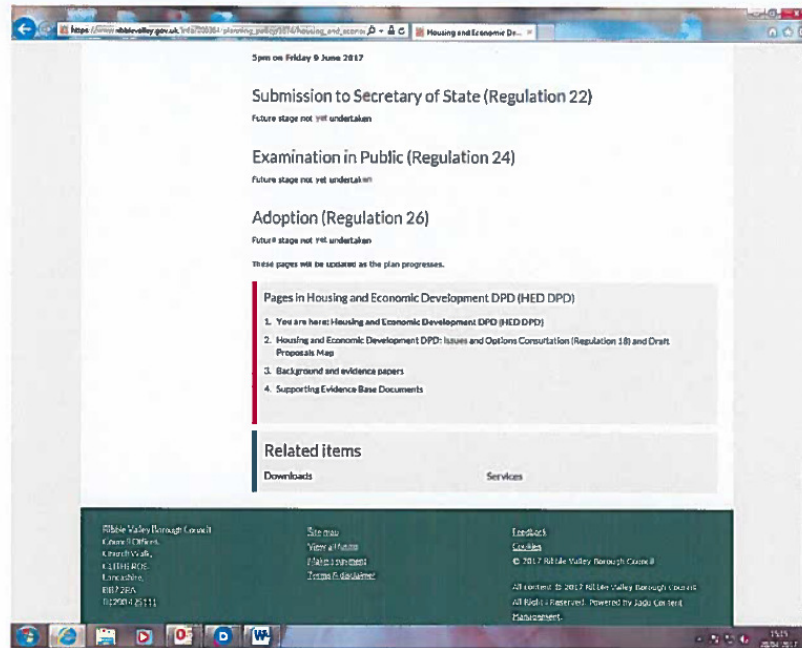
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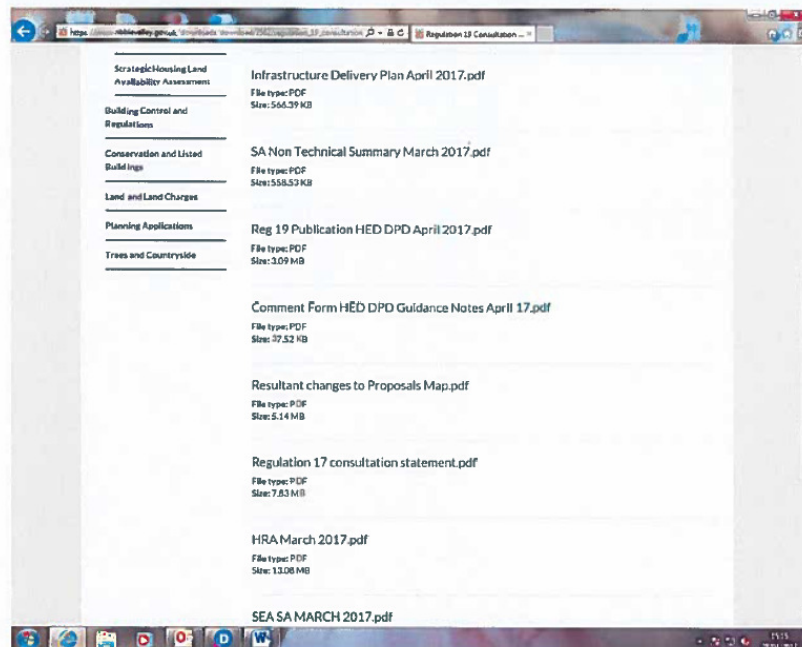
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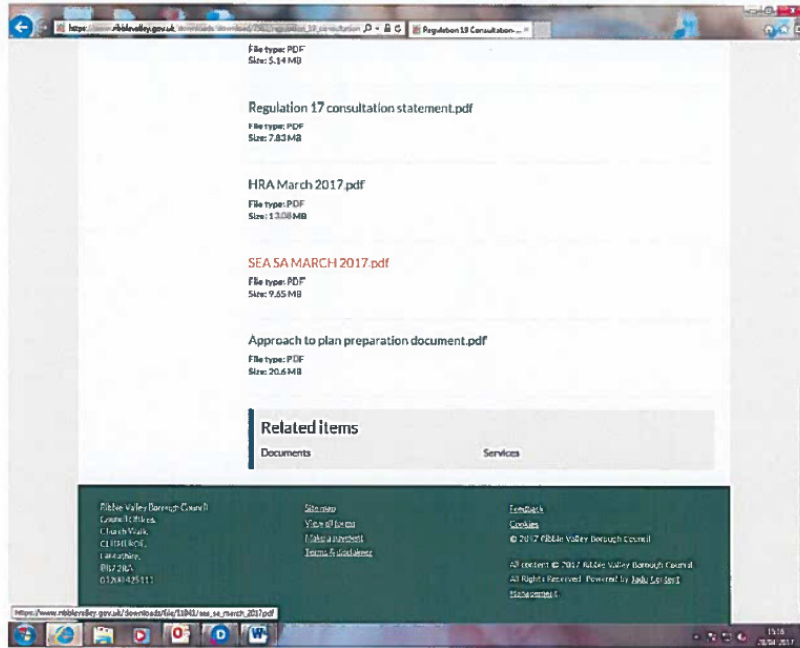
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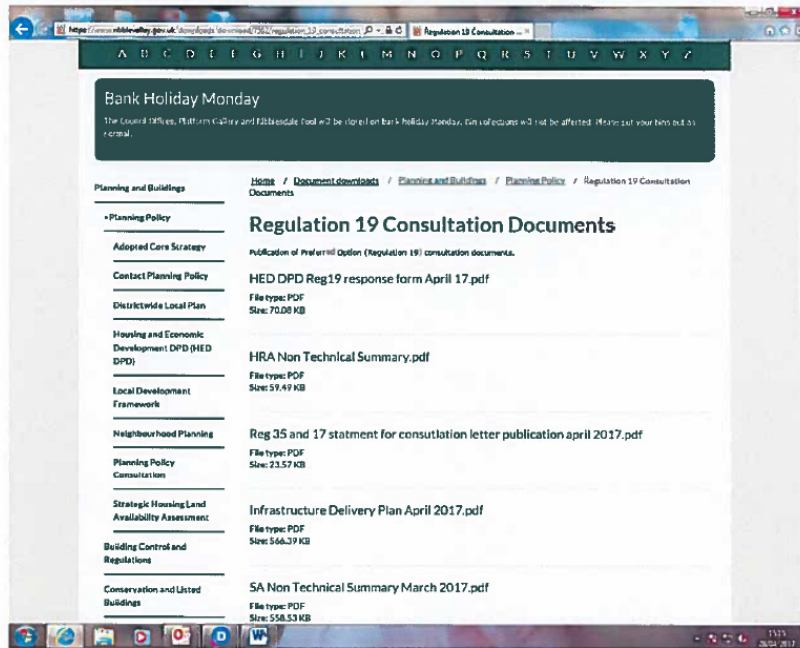
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