

## **B2 –Village Development Supplementary Planning Document**

### **Consultation Statement/Responses Report**

#### Purpose and Background

This statement sets out details of the consultation that has taken place which has informed the development and refinement of the B2 – Village Development Supplementary Planning Document (SPD). It provides:

- Details of consultation during preparation of the draft SPD, including who was consulted, how and when, what main issues were raised and how they were addressed
- Details of the formal public consultation, included who was consulted, how and when and a full summary of the comments received by respondent and how they have been addressed in the final version of the SPD.

The statement has been produced to demonstrate compliance with regulations 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which sets out the requirements for public participation and for preparing a consultation statement.

#### Formal Consultation on the SPD

Public consultation on the SPD was undertaken from 26 June until 7 August (5pm). The document was made available:

- On the Council's website [www.southribble.gov.uk/consultations](http://www.southribble.gov.uk/consultations)
- In hard copy at the Council Offices, Civic Centre, West Paddock, Leyland, PR25 1DH (during office hours)
- In hard copy at all of the Borough libraries.

All individuals and organisations on the Planning Policy Consultation Database were notified via email or letter of the consultation. Local residents who had previously expressed a desire to be notified of the consultation, but were not on the database, were also notified.

People were invited to send feedback either via email, to [planningpolicy@southribble.gov.uk](mailto:planningpolicy@southribble.gov.uk), or via post to the Council offices at the above address. A telephone number for the planning policy team, for assistance or further information, was also provided on all publicity.

## Representations Received and Council's Response

The Council received 18 responses to the consultation. These can be viewed below, along with the Council's response to them.

Reference	Representation	Change to SPD Needed?	Council's Response
1	<p>Dear Planning Office</p> <p>Generally, it appears that there should be no issue with this development, however, but there may be a requirement to take in consideration the positions of the villages with usual aircraft routing points as this could raise a noise issue.</p> <p>If any buildings planned are of any significant height it also may be necessary to lodge our concerns.</p>	N	Comments noted. No change to SPD required.
2	<p>Thank you for your notification received on the 26 June 2019 in respect of the above consultation.</p> <p>As you are aware the South Ribble area lies within the defined coalfield, however, our records indicate that there is no surface coal resource present or recorded risks from past coal mining activity at shallow depth.</p> <p>On the basis of the above we have no specific comments to make on the Village Development SPD.</p>	N	Comments noted. No change to SPD required.
3	<p>Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.</p>	N	Comments noted. No change to SPD required.

	<p>Thank you for your email dated 26 Jun 19 notifying Historic England of the intention to prepare a Village Development SPD.</p> <p>We would encourage you to consider the historic environment in the production of your SPD. We recommend that you seek advice from the local authority conservation officer and from the appropriate archaeological staff. They are best placed to provide information on the historic environment, advise on local historic environment issues and priorities, indicate how heritage assets may be affected and identify opportunities for securing wider benefits through the conservation and enhancement of the historic environment.</p>		
4	<p>Thank you for consulting Highways England on the proposed new SPD B2 for Local Needs in Villages.</p> <p>There are no comments we feel we need to make about the draft policy.</p> <p>Please contact me if you would like to discuss anything about this email.</p>	N	Comments noted. No change to SPD required.
5	<p>Network Rail has no comments to make.</p>	N	Comments noted. No change to SPD required.
6	<p>I would firstly like to thank you for the opportunity to comment on the Local Needs in Villages SPD.</p> <p>Homes England is the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.</p> <p>Homes England does not have any land holdings affected by the consultation but we are keen to continue to work with you to fulfil your housing growth ambitions.</p>	N	Comments noted. No changes to SPD required.
7	<p>Thank you for your consultation on the above dated 26 June 2019, which was received by Natural England on 26 June 2019.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>	N	Comments noted. No changes to SPD required.

	<p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p><b>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</b></p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p><b>Strategic Environmental Assessment/Habitats Regulations Assessment</b>  A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance <a href="#">here</a>. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>		
8	<p>Lancashire County Council School Planning Team has received notification from South Ribble Borough Council the latest local plan consultation B2 – Village Development Supplementary Planning Document SPD June 2019. The school Planning Team has reviewed the document in conjunction with the district council adopted local plan. A brief response has been included below.</p> <p><b>Education Strategy</b>  Section 14 of the Education Act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire. Some children have Special Educational Needs for which they access school provision outside of Lancashire. Special Educational Needs provision is managed by LCC's SEND Team and is not covered by this response. The Strategy for the provision of school places and school's capital investment 17/18 to 19/20 provides the context and policy for school place provision and schools capital strategy in Lancashire. Over the coming years, Lancashire County Council and its local authority partners will need to address a range of issues around school organisation in order to maintain a coherent system</p>	N	<p>Comments noted. The issues raised in the response in relation to education provision are not something that this SPD can address. Education provision and planning contributions needs to be addressed through the correct mechanisms within the Development Management process. Monitoring of all residential development, regardless of size, is done thoroughly by the Planning Policy team and the results published in the form of the annual Housing Land Position Statement.</p>

	<p>that is fit for purpose, stable, and delivering the best possible outcomes for children and young people.</p> <p>Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the demand of a new development there is the potential to have an adverse impact on the infrastructure of its local community, with children having to travel greater distances to access a school place.</p> <p>In a letter from the DfE to all Chief Executives, the Minister of State for Housing and the Parliamentary Under Secretary of State for Schools jointly stated that 'where major new housing developments create an additional need for school places, then the local authority should expect a substantial contribution from the developer towards the cost of meeting this requirement.'</p> <p>The SPT produces an Education Contribution Methodology document which outlines the Lancashire County Council methodology for assessing the likely impact of new housing developments on school places, where necessary mitigating the impact, by securing education contributions from developers.</p> <p>In order to assess the impact of a development the School Planning Team consider demand for places against the capacity of primary schools within 2 miles and secondary schools within 3 miles. These distances are in line with DfE travel to school guidance and Lancashire County Councils Home to School Transport Policy.</p> <p>Planning obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are:</p> <ul style="list-style-type: none"><li>• Already over-subscribed,</li><li>• Projected to become over-subscribed within 5 years, or</li><li>• A development results in demand for a school site to be provided.</li></ul> <p><b>Response to the consultation</b></p> <p>The Supplementary Planning Document (SPD) sets out and clarifies how the council will use Policies B2 in regard to permitted development across the district villages. It is likely that these developments will be small in number and built to support local need, with a clear criteria to be used by developers to evidence their planning application.</p>		
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9	<p>Further to your email regarding The B2 – Local Needs in Villages.</p> <p>Although SRBC recognise the need for village developments to allow villagers the opportunity to live locally .The evidence supports a robust housing policy within the urban areas however neglects the more rural locations within South Ribble.</p> <p>In Samlesbury very limited opportunity has been highlighted by the local authority. The methods of assessing local demand has been under considerable investigation including – University of Cambridge – ‘Providing the Evidence Base for Local Housing Need and Demand assessments October 2011’. The sources we have researched are Veterans Gateway, Shelter and the local authority planning/housing guidance. The National planning policy and National planning framework.</p> <p>The result is plenty of well-meaning words and guidance with little practical application! Social housing is at a 70 year low for new build within England and Wales.The housing crisis is crippling the whole of England. In South Ribble 10 years ago(2008) there was 293 people requiring council or social rented housing, in 2018 there was 886 people requiring housing. These figures can be verified by Shelter England.</p>	N	<p>Comments noted. Whilst the response does raise some issues with need for housing in Samlesbury, this is not an issue that this SPD would address. This SPD relates only to the sites in the Borough that are currently allocated under Policy B2, and is an interim measure until the review of the Local Plan is completed. The review of the Local Plan will look at need for housing across the Borough, including affordable and supported housing for older people, and this will be addressed through this process.</p>

	<p>We feel the council have paid little attention in B2 to older and less able people who would like to remain in the villages or rural communities they have lived in or would like to return to .The council mention older people living in bigger houses and need to downsize but how can that be achieved if there is no appropriate housing available in villages like Samlesbury ?</p> <p>The other question is -people in their later years are living in houses which are far from ideal for elderly persons. It would make better financial sense rather than spending public funds on introducing alterations and adaption to allow elderly persons to have the choice of living in their homes or relocating to purpose built accommodation to cater for their varying needs but in the locality they have lived the majority of their lives</p> <p>National and local government should be at the forefront of encouraging housing for the care sector, independent living through to later years and providing village housing for our ex service personnel as a matter urgency and priority without reservation.</p>		
10	<p>Strategic Housing are supportive of the introduction of the SPD. The SPD will provide further guidance and detail as to the evidence required to demonstrate local housing need to support planning applications for the development of land designated under policy B2 of the South Ribble Local Plan.</p> <p>Policy B2 permits certain development which meets a local need, including local affordable housing. Market housing can be provided on the development to enable the site to be developed to meet the identified local need.</p> <p><b>Section 5, Paragraph 5.2</b> of the draft states that <i>“If the Council does not have an up-to-date Housing Needs Survey for the settlement which the development is proposed, the Council should undertake this survey”</i></p> <p>I would suggest that if there is no up-to-date Housing Needs Survey then it should be the responsibility of the applicant to undertake that survey with the scope to be agreed with the Council and Parish Council (where applicable).</p> <p>The words “up-to-date” could also be open to interpretations so I would therefore suggest further clarification on this and define by “within the last 5 years”.</p>	Y	<p>Comments noted.</p> <p>The inclusion in the draft SPD of an onus on the Council to undertake a Housing Needs Study was a political aspiration requested by the Planning Committee.</p> <p>There will be a significant cost associated with the Council undertaking the Study, as well as time implications. There is a real risk that the Study would not be completed in time, leading to the Council being vulnerable for applications on all of these sites without having the evidence to refuse them.</p> <p>The cost of Housing Needs Studies can run into tens of thousands of pounds, and they can take many months to complete.</p>

	<p><b>Section 5, Paragraph 5.3</b> should read that a Local Housing Needs Survey should be undertaken by the applicant, if there is not already one in place.</p> <p><b>Section 4</b> and the second half of <b>Section 5</b> specifically reference ‘market housing, although this is not specified in Policy B2. References to market housing in the SPD could open the site up to potential applications for residential development of market housing as the main reason for application rather than market housing permitted as an enabler of affordable housing.</p> <p>Strategic Housing agree with the SPD in that affordable housing built to meet Village Need must remain affordable in perpetuity and expect there to be a cascade approach to locality which is appropriate to the affordable housing tenure and agreed between the Council and RP/developer.</p>		<p>If a developer were to undertake the Study as part of the application, the SPD could require that the scope of the work is agreed prior to commencement with the Council and the Parish Council (where relevant) to ensure that the study is as robust as possible, and that it is in place for when an application is received.</p> <p>Officers therefore recommend that the SPD is altered to require the applicant to provide the Study, done alongside officers from Strategic Housing and the relevant Parish Council. This is considered to be the most robust approach.</p> <p>During the Inquiry Process for the Local Plan, the Planning Inspector removed the restriction in the then draft Policy B2 to prevent market housing being delivered on sites covered by this allocation. This can be seen in her letter to the Council dated 1 April 2014, where she clearly states that this restriction should be removed. She also stated in the Inspectors Report into the Plan that this modification to remove the restriction on Market Housing was in line with Government Guidance and ensures the plan is positively prepared. As there is no restriction in the Policy on market housing, it is considered to be appropriate for the SPD to include guidance for such applications.</p>
11	<p>Thank you for your email of 26<sup>th</sup> June referring to the above matter.</p> <p>May I say at the outset that my wife and I welcome this SPD as there is clearly a need to ensure that the term “local needs” in the B2 policy, is being adhered to. Failure to adhere to “local need” being a “local village/settlement need” in effect makes all the B2 sites in the Borough general planning site with no proper land allocation that is linked to any locally identified evidence based village need.</p> <p>Unfortunately there are still some inconsistencies within the draft SPD.</p> <p>Turning to the draft SPD:-</p>	Y	<p>Comments noted. Responses answered in turn below:</p> <ul style="list-style-type: none"> <li>a. Whilst not considered to be necessary, the rest of the paragraph has been added for completeness.</li> <li>b. Agreed. Revision made.</li> </ul>

	<p>a) Paragraph 3.2 – bearing in mind the village is surrounded by green belt surely you should also add the rest of Paragraph 180 i.e. “as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development”.</p> <p>b) Paragraph 3.6 – second line the word “local” needs to be inserted so it reads “... appropriate evidence to demonstrate the local need for the development...”</p> <p>c) Paragraph 5.1 – I find paragraph 5.1 confusing. Whilst you state at 3.6 that B2 does not rank the listed acceptable uses it does clearly state “local <u>affordable</u> housing”, yet at paragraph 5.1 you have now added to the B2 list “market housing”. Market housing does not come within the B2 policy. Market housing should only be permitted to support the viability for “affordable housing” or another local village need. The village need survey is for “affordable housing” not Market housing. Market homes is only allowed to facilitate the provision of affordable home i.e. viability reasons only and Paragraph 5.4 correctly sets out the policies of a maximum of 35% market homes contained in the Affordable Housing SPD.</p> <p>d) Paragraph 5.2 and Paragraph 5.7 – the term “up to date” needs to be clarified. May I suggest within 2 years of the application for planning permission.</p> <p>e) Paragraph 5.3 – the words “in the village settlement” should be added. Currently the South Ribble housing surveys cover areas far too wide to support the B2 policy. Paragraph 5.3 should read “The local Housing Needs survey in the village settlement should be undertaken .....</p> <p>f) Paragraph 5.6 – the sources listed covers large areas of the Borough and in some case expands into neighbouring boroughs so are not “local to the village settlements” identified in the B2 policy. For example</p> <ul style="list-style-type: none"> <li>• Self-build Register – the term “area” is not defined but I assume the register covers the whole of South Ribble?</li> </ul>		<p>c. Policy B2 does not have any restriction on market housing, providing there is a demonstrated local need for what is being proposed. During the Inquiry Process for the Local Plan, the Planning Inspector removed the restriction in the then draft Policy B2 to prevent market housing being delivered on sites covered by this allocation. This can be seen in her letter to the Council dated 1 April 2014, where she clearly states that this restriction should be removed. She also stated in the Inspectors Report into the Plan that this modification to remove the restriction on Market Housing was in line with Government Guidance and ensures the plan is positively prepared. As there is no restriction in the Policy on market housing, it is considered to be appropriate for the SPD to include guidance for such applications. The Policy does not say that market housing will only be permitted to facilitate affordable housing, and therefore the SPD cannot say this.</p> <p>d. Agree that the term needs to be clarified. Research into good practice across Government and other Local Authorities indicates that anything over 5 years is considered to be out of date, so the SPD will be amended to reflect this.</p> <p>e. This is not considered to be necessary as the SPD makes it clear the Housing Needs Survey should be for the settlement in which the development is proposed.</p> <p>f. This is a non-exhaustive list of other evidence which could be used to support an</p>
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	<ul style="list-style-type: none"> <li>• Select Move Policy (waiting list) – the term “locality of the area” is not defined so does it mean PR5 or PR6</li> </ul> <p>g) Paragraph 5.8 - should be deleted – see c) above. This clarification of B2 should not be about a survey for market houses.</p> <p>h) Why have Paragraph 5.9? Is 5.9 repeats some of the list that appears in 5.6. Why not just extend 5.6?</p> <p>Also 5.9 you have missed out the word “local” again - it should read the same as 5.6 i.e. “The Local Housing Needs Survey” by which you mean “the village/settlement survey”.</p> <p>i) We personally don’t believe you should allow anecdotal evidence.</p> <p>j) Paragraph 7.1 bullet point 2 needs clarification. If the local settlement need is for a community use that is not affordable housing then the residential development should only be allowed to make the community use viable. Otherwise developers will come up with large housing developments and a small community use/facility to justify the release of the B2 land.</p> <p>Equally if the proposed scheme is for affordable housing then the term “either” should be deleted, as the “housing local need survey” will shows a need for affordable housing and market houses comes about to make the affordable homes viable. As 7.1 bullet point 2 is written it adds market homes to the B2 list of community need.– that is not in the current B2 policy.</p> <p>k) Paragraph 7.1 – bullet point 3 – the term “local” is missing again before the word housing needs.</p>		<p>application. With reference to the examples given, the Self Build Register is broken down into the local area/settlement in which the person has expressed an interest. Applicants have to select a settlement in which they would like to live on Select Move.</p> <p>g. See response to point C above.</p> <p>h. Paragraph 5.9 is again a non-exhaustive list of examples of evidence which could support an application for market housing. Paragraph 5.7 under the heading Market Housing makes it clear the Housing Needs Survey should be for the settlement in which the development is proposed.</p> <p>i. Anecdotal evidence, alongside evidence from other sources, can be a valuable source of information.</p> <p>j. No change needed – the applicant would still have to demonstrate the local need for the housing. Policy B2 does not restrict market housing.</p> <p>k. The SPD makes it clear the Housing Needs Survey has to be locally based.</p> <p>l. This is already in the SPD – see paragraph 5.5.</p>
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12	<p>Thank you for the explanation on my landholding at Pear Tree Farm, Hoghton Lane, Higher Walton, Preston PR5 4EH</p> <p>This prompted me to visit your Planning Policies site and therefore I now have the following comments to make on your supplementary planning document draft.</p> <p>It seems to me that the yellow hatched land located north of Methuen Drive as shown in the South Ribble Local Plan Policy Map 2015 and allocated for future local need at Coup Green is excessive for the local need.</p> <p>It has been subject to 2 recent Planning applications references: 07/2017/0621/FUL and 07/2017/3843/FUL which requested to build 78 then 70 dwellings.</p> <p>This yellow hatched land extends into open Countryside and should be part of the Green Belt.</p> <p>I would have expected that limited infilling in villages, exceptions to Policy G1 Green Belt, would be more relevant to the smaller area at Pear Tree Farm as my previously submitted plans and between Hoghton Lane Garage and 10 to 22 Poulton Crescent.</p> <p>There doesn't seem to be any common sense for safeguarding such a large site (2.37ha) at Coup Green when there is a site suitable for limited infilling at Pear Tree Farm. This would involve partial redevelopment of a previously developed site (brownfield land) 0.5 ha.</p> <p>Pear Tree Farm is not a working Farm or business like Cuerdale Hey Farm which would be badly affected by housing development next to it.</p>	N	<p>Comments noted. The issues raised in this response in relation to the suitability of sites and the availability of land at Pear Tree Farm are beyond the remit of this SPD. As Policy B2 is part of an adopted Local Plan, the sites it refers to are allocated and the Council is seeking to ensure that there is clarity and guidance for planning applications on these sites.</p> <p>The suitability of these sites, and others in the villages of South Ribble, is a matter for the Local Plan Review. This work has already commenced.</p>

	<p>Put simply, (paragraph 3.5 of your document), if you need a development to meet a local need which cannot be satisfied elsewhere within the village settlement. You don't need another 78 or 70 dwellings as in planning applications 07/2017/0621/FUL and 07/2017/3843/FUL. Especially when the local need can be satisfied elsewhere within the village settlement by limited infilling.</p> <p>This is why I think your supplementary policy document draft was issued.</p> <p>Therefore your Policy B2 is either wrong or too large an allocation of land has been made in the South Ribble Local Plan Policy Map 2015 for future needs is wrong or perhaps there is some phasing of the site proposed.</p>		
13	<p>I refer to the opportunity that South Ribble Borough Council is offering in respect of consulting on new Supplementary Planning Documents (SPDs) and in particular that relating to and supplementing Policy B2 – Village Development of the South Ribble Local Plan (2012 – 2026) adopted July 2015.</p> <p>The SPD sets out what evidence developers will be required to provide as part of a planning application on sites allocated under Policy B2.</p> <p>I note that it is stated clearly that the SPD does not introduce new policies. The SPD is there to provide clarity on existing policies and provide further detail/guidance on how the requirements of the Central Lancashire Core Strategy and the South Ribble Local Plan will be applied.</p> <p>From the initial gathering and preparation of issues in 2010 to its adoption in 2015 the Local Plan (2012 – 2026) went through many stages of discussion and vetting. As such the content and meanings are deemed clear and concise and the procedure self-explanatory. It identifies and allocates land required over a 15 year period in order to achieve the vision for growth as outlined in the Central Lancashire Core Strategy. Not only does it highlight where development is needed it also protects and prevents development until certain criteria are met. The SPD relating to Policy B2 is therefore meant as a means to remove any existing ambiguity and confusion arising from what constitutes 'local need' together with the evidential provisions required as a precursor to the development application submitted under 'local need'.</p>	Y	<p>Comments noted.</p> <p>3.2 - This change has been made.</p> <p>3.6 - This change has been made.</p> <p>Section 4 - Policy B2 does not have any restriction on market housing, providing there is a demonstrated local need for what is being proposed. During the Inquiry Process for the Local Plan, the Planning Inspector removed the restriction in the then draft Policy B2 to prevent market housing being delivered on sites covered by this allocation. This can be seen in her letter to the Council dated 1 April 2014, where she clearly states that this restriction should be removed. She also stated in the Inspectors Report into the Plan that this modification to remove the restriction on Market Housing was in line with Government Guidance and ensures the plan is positively prepared. As there is no restriction in the Policy on market housing, it is considered to be appropriate for the SPD to include guidance for such applications. The Policy does not say that market</p>

	<p>With this as the background to my understanding of this SPD and in reference to the clause numbers as noted in the draft SPD I comment as follows:-</p> <p>3.2 Please quote all of paragraph 180 from the NPPF document. It is only partially quoted at present and this is lazy drafting.</p> <p>3.6 Add 'local' before 'need'. This surely is why the document is being drafted in the first place.</p> <p>Section 4 There is a reference to 'market housing' albeit there is no reference to this form of development in Policy B2. This therefore should be removed as this is contrary to the driving statement that the SPD would not introduce new policies or proposals but only provide further detail/guidance on the existing. Intentionally or not the inclusion of the words 'market housing' is not a clarification but would as a consequence add a factor that is divergent from the documents' stated objective.</p> <p>Section 5</p> <p>5.1 This includes a reference to 'market housing' which as noted in Section 4 comments is new wording to that included in the current Policy B2 – Village Development. The words 'market housing' therefore should be deleted.</p> <p>5.2 The words 'up to date' are meaningless unless a definition as to what is 'to date' is included. This therefore needs to be re-worded to include whatever time span is deemed to be appropriate.</p> <p>5.3 The Local Housing Needs' survey should be referenced to the village settlement that it has been undertaken for. This makes it particular relevant to the village settlement for which the 'local need' addresses.</p> <p>5.6 Bullet point 1 – Self-build Register - the words 'the area' needs defining in detail.</p> <p>Bullet point 3 – Select Move Policy – the words 'locality of the site' needs defining in detail.</p> <p>Bullet point 4 – North –West help to buy - the words 'the area' need defining in detail.</p>	<p>housing will only be permitted to facilitate affordable housing, and therefore the SPD cannot say this.</p> <p>Section 5 – 5.1 – Please see comment above for Section 4.</p> <p>Section 5 – 5.2 – Agreed – this has been amended to reflect good practice, which considers anything over 5 years to be up-to-date.</p> <p>Section 5 – 5.3 – This is already stated in paragraph 5.2.</p> <p>5.6 Bullet 1 - Applicants are asked in which settlement they are seeking a plot for self-build. We can therefore see from the Register how many people are seeking a plot in each settlement of the Borough.</p> <p>5.6 Bullet 3/4 – Again, applicants are asked which settlement they are seeking a property.</p> <p>5.6 Census information can be broken down to an extremely small area – i.e. less than a settlement, such as wards, output areas and super output areas. Applicants would be expected to use whichever areas best represent the settlement boundaries, and the SPD has been amended to show this.</p> <p>Market Housing. This section cannot be deleted as explained above.</p> <p>5.7 – Agreed, and SPD has been amended.</p>
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<p>Bullet point 6 – Census Information - the words ‘an area’ need defining in detail.</p> <p>Market Housing – This sub-section wording needs deleting as it makes reference to a ‘local need’ that is absent from Policy B2 – Village Development wording. It should be remembered that the South Ribble Local Plan took 5 years to draft and as ‘market housing’ is the foremost form of development in the whole Local Plan it must be understood that ‘market housing’ was intentionally left out of the list of ‘local needs’ that are stated in Policy B2 – Village Development This omission cannot be considered an oversight but a deliberate decision in the adoption process. Market housing as a separate item is not referred to within the Policy B2 – Village Development wording. Market housing is only a consideration when the viability of ‘affordable housing’ or other ‘local need’ necessitate it to be taken into account. Both ‘affordable housing’ and ‘local need’ are listed under Policy B2 – Village Development. The Local Housing Needs Survey, as noted in 5.1 is deemed to be for ‘affordable’ not ‘market’ housing.</p> <p>5.7 The words ‘up to date’ are meaningless unless a definition is included as to what is ‘to date’. This therefore needs to be re-worded to include whatever time span is deemed to be appropriate.</p> <p>5.8 This clause refers to ‘market homes’ which are outside Policy B2 – Village Development and as such does not require clarification in this SPD.</p> <p>5.9 The Housing Needs Survey needs pre-texting with the word ‘Local’.</p> <p>Bullet point 2 – Local anecdotal evidence – it should be noted this form of evidence is not necessarily true or reliable because it is based on personal accounts rather than facts or research. Therefore it should not be allowed as an item for consideration.</p> <p>Bullet point 3 – SHMA – This bullet point is already referred to in 5.6 so no need to include it again.</p> <p>Bullet point 4 - The Housing Needs Survey needs pre-texting with the word ‘Local’.</p> <p>Bullet point 5 - This bullet point is already referred to in 5.6 so no need to include it again.</p> <p>Bullet point 6 - This bullet point is already referred to in 5.6 so no need to include it again.</p>		<p>5.8 – Policy B2 does not restrict market housing and therefore this section is entirely appropriate.</p> <p>5.9 The SPD makes it clear that the Housing Needs Survey needs to be locally based.</p> <p>Local anecdotal evidence – Can be useful when supported with other forms of evidence.</p> <p>6 – Community uses – the scale cannot be defined as the size of the centre should be determined by the demonstrated need. The words “small” and “large” in this context are used to demonstrate the scale of the centre proposed should be in proportion with the need that has been demonstrated.</p> <p>7.1 - As market housing is allowed under Policy B2, there is no need to delete this reference.</p>
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	<p>6 Local Need for Community Uses – the final sub-section of this clause refers to ‘scale’ however both ‘large’ and ‘small’ should be defined in greater detail.</p> <p>7 1 Assessing Planning Applications</p> <p>Bullet point 2 - the words ‘either market’ need deleting as previously explained are additional to the existing Policy B2- Village Development and the addition of ‘Local’ needs to be made to ‘Housing Needs Survey’.</p> <p>Bullet point 3 - The ‘Housing Needs Survey’ needs pre-texting with the word ‘Local’.</p> <p>I submit the above observations in a positive manner to assist in the drafting of this SPD. I concur with the view of South Ribble Borough Council that both defined clarity of the requirements and evidence needed in demonstrating ‘Local Need’ in relation to Policy B2 is necessary. The drafted document as currently presented meets the majority of that aim although some contradiction and obscurity exists which nevertheless should be addressed with re-drafting. However the addition of a category defined as ‘market housing’, which is over and above that which existed prior in the B2 policy wording, is unacceptable and should be deleted.</p> <p>I welcome the opportunity that South Ribble Borough Council has given me to forward my views on the drafting of “B2 – Local Needs in Villages SPD”.</p>		
14	<p>Having read &amp; studied the above titled draft S.P.D. we endorse all comments regards the said document made by John &amp; Janis Bremmers in their letter to you dated July 16th. 2019. We would however point out that in paragraph 7 “Assessing Planning Applications”, 7.1 item 2 looks to include “Market Housing” in an up to date “Housing Needs Survey”. This is not what B2 land for “Village Needs” is about &amp; any “Housing Needs Survey” should be based on “Affordable Housing” with no mention of “Market Housing” what so ever.</p>	N	<p>Comments noted. During the Inquiry Process for the Local Plan, the Planning Inspector removed the restriction in the then draft Policy B2 to prevent market housing being delivered on sites covered by this allocation. This can be seen in her letter to the Council dated 1 April 2014, where she clearly states that this restriction should be removed. She also stated in the Inspectors Report into the Plan that this modification to remove the restriction on Market Housing was in line with Government Guidance and ensures the plan is positively prepared. As there is no restriction in the Policy on</p>

			market housing, it is considered to be appropriate for the SPD to include guidance for such applications.
15	<p>Further to my email to your department dated 25<sup>th</sup> July 2019 regarding the Supplementary Planning Document in respect of Policy B2 I would add the following comments to those already made.</p> <p>I believe that the wording explaining 'local need' should include the emphasis that any 'local need' has arisen and been instigated by a local village/ settlement as scheduled in the Plan and not by third parties i.e. developers.</p> <p>The types of 'local need' are listed and explained in Policy B2. These local needs are deemed relative to the needs of the village / settlement and if or when a 'local need' is required. It is only after this establishment of fact through the village/settlement inhabitants, their councilors and the South Ribble Borough Council that developers should be sought to offer potential development to meet this need. It should not be the case that the developer tries to establish and sell a 'local need' that has not been sought by the village/settlement in the first place.</p> <p>Any local need must be determined and agreed upon by the council and local community of being relative to the requirements of the village /settlement before the involvement of any developer. It is unacceptable to use the perceived view of the developer expressed through his planning application as justification of there being a requirement for a 'local need' and use land safeguarded for this want. It should be the village/settlement that starts any chain of action in the regards to the necessity or otherwise of local needs and not a developer whose engagement should only follow after the local need being established. The priority of the developer is to seek opportunities to build upon land to make a profit and then move on whilst the village/settlement is one of safeguarding what they have with the knowledge that should a local need arise prior to 2026 there are means to address it. It isn't for the developer to tell the village/settlement what it needs as this may be seen solely as self purporting for its own benefit.</p> <p>I submit the above observations in a positive manner to assist in the drafting of this SPD. I concur with the view of South Ribble Borough Council that both defined clarity of the</p>	N	<p>The SPD can only support the existing policy, not introduce new policies. The current policy does not indicate that the "local need" has been instigated by the village, not by developers, and therefore this cannot be included in the SPD.</p> <p>The feasibility of this would need to be investigated as part of the Local Plan review process.</p> <p>Whilst there is a list in Policy B2 in the adopted Local Plan, however this is a non-exhaustive list of possible uses for these sites.</p> <p>The Policy and the SPD require that evidence is submitted to demonstrate any Local Need for development – it cannot simply be the view of the developer.</p>

	requirements and evidence needed in demonstrating 'Local Need' in relation to Policy B2 is necessary		
16	United Utilities has reviewed the above referenced Draft SPD and in this case has no comments to make. I would be grateful if you could continue to consult United Utilities on any future Planning Policy consultations.	N	Comments noted. No changes to the SPD required.
17	<p><b>1. INTRODUCTION</b></p> <p>1.1 This representation has been prepared by Barton Willmore on behalf of Galliford Try Partnerships (GTP) in relation to South Ribble Borough Council's ('the Council') consultation draft of a Supplementary Planning Document (SPD) to supplement Policy B2 of the adopted South Ribble Local Plan. The purpose of the SPD is to provide guidance in relation to Policy B2 and how developers are required to demonstrate the 'need' for development of Sites allocated under Policy B2.</p> <p>1.2 The Consultation Draft of the SPD was published for consultation on 26th June 2019 for a period of 6 weeks.</p> <p>1.3 GTP has land interests across the Borough but specifically has land interests at Land at Land at Olive Farm and, Land north of Methuen Drive, Hoghton, Lancashire (the Site). That land is allocated for 'Village Development' under Policy B2 of the adopted Local Plan (2012-2026) adopted in July 2015.</p> <p>1.4 The Site extends to 2.37 hectares and comprises flat open farm land. A full planning application of up to 70 units (LPA Reference 07/2017/3843/FUL) at the Site was refused by the Council on 7th December 2018. That planning application is subject to a S.78 Appeal submitted on the 1st June 2010 (PINS Appeal Reference: APP/F2360/W/19/3230528). The appropriate interpretation of Policy B2, and whether it is necessary to demonstrate the 'need' for development, is a matter of dispute between the Council and GTP in that Appeal. These representations do not seek to make that case and are made separately from the Appeal process.</p> <p>1.5 Notwithstanding the above, and by way of background, proposed development at the above Site was previously the subject of an application for 78 dwellings and associated works) which was refused by the LPA on 23rd June 2017 (LPA Reference 07/2017/0621/FUL)</p>	Y	<p>Following on from this response, the Council sought legal advice on the Draft SPD from Counsel. A copy of the draft SPD was provided, as well as the response from GTP, and Policy B2 from the Local Plan. The advice from Counsel forms the basis to the Council's response to this objection.</p> <p>The central objection from GTP is summarised in paragraph 2.14 of their response, and states the following:</p> <p>"As a matter of fact, Policy B2 has no such requirement to demonstrate need and GTP considers that the SPD is based entirely on that incorrect assertion. The SPD seeks only to introduce tests which relate to a policy requirement that does not exist and, as such, has the effect of seeking to introduce new policies into the development plan. The introduction of such a policy conflicts with the policies of the adopted development plan. This is fundamentally against the principles of providing an SPD set out within...legislation and within the [Planning Practice Guidance]"</p> <p>The advice received clearly states that Counsel does not believe that GTP's central objection</p>

<p>and subsequently dismissed at appeal in a Decision Letter dated 3rd April 2018 (PINS Reference APP/F2360/W/17/3189313).</p> <p>1.6 The Inspector at the previous Appeal (3189313) considered the principle of development at the Site and confirmed that the Site is safeguarded to meet local needs (under Policy B2 of the South Ribble Local Plan), and it will only be released during the plan period for development that cannot be accommodated within the existing built-up area of the village, or if this site is preferable for the use proposed. At the time of the Appeal, the LPA did not dispute that there are no other sites within the village settlement that could accommodate the proposal; and there was no discussion within the Appeal Decision Letter as to the ‘need’ for development had been demonstrated. The Inspector confirmed the benefits of delivering development at the Site which would meet local needs.</p> <p>1.7 These representations are made in accordance with regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012. These representations raise significant concerns held by GTP in relation to appropriateness and lawfulness of the SPD as well as concerns regarding its content. In particular, we have concerns with regard to how the SPD might impact on the soundness of the Local Plan by virtue of undermining the extent to which Policy B2 was positively prepared, justified, effective and in line with national planning policy.</p> <p>1.8 For the reasons set out within these representations, our concerns are so significant that we request the Secretary of State make a direction to the Council not to adopt the SPD as afforded to him by Regulation 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 21 of the Planning and Compulsory Purchase Act 2004.</p> <p>1.9 GTP requests that the Council make this request known to the Secretary of State along with a copy of these representations prior to any further consideration of the SPD by the Council. GTP requests confirmation that the Council are content to forward this request to the Secretary of State.</p> <p><b>2. LAWFULNESS OF THE SPD</b></p> <p>2.1 As set out above, the purpose of the Supplementary Planning Document (SPD) subject of this consultation is to supplement ‘Policy B2’ of the adopted South Ribble Local Plan 2012-2026 (adopted July 2015). The Local Plan, along with the Central Lancashire Core Strategy</p>	<p>has merit. The reasoning behind this statement is addressed below.</p> <p>The response from GTP includes further sections headed “Soundness of the Local Plan” and “Addressing the Policy Requirements of the SPD”. Counsel has also provided advice on these sections of the representation.</p> <p><b>Response to GTP’s Central Objection</b></p> <p>As noted above, GTP’s central objection to the Draft SPD is that it introduces a new policy requirement that is absent from Policy B2 of the Council’s Local Plan, namely, a requirement that an applicant for planning permission demonstrates that there is a local need for its proposed development.</p> <p>The opening sentence of Policy B2 of the Local Plan is as follows;</p> <p>“Land on the periphery of Much Hoole, New Longton, Coupe Green and Mellor Brook is safeguarded to meet local needs as shown on the Policies Map”.</p> <p>Accordingly, in order to benefit from the Policy (i.e. to achieve support for proposed development of land safeguarded by Policy B2), the proposed development must meet local needs. Counsel does not consider there can be any doubt regarding that interpretation of</p>
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<p>2010-2026 (adopted July 2012) (the “Core Strategy”) forms the operative development plan for decision making in the borough1.</p> <p>1 These representations do not have regard to minerals and waste planning.</p> <p>2.2 The provision for the creation of Supplementary Planning Documents (SPD), such as the SPD subject of this consultation, is afforded by Section 17 of the Planning and Compulsory Purchase Act 2004 (the Act) which permits the creation of ‘local development documents’. An SPD is a local development document, but is not a development plan document (i.e. does not form part of the development plan).</p> <p>2.3 Section 17(3) of the Act states that the local planning authority’s local development documents must (taken as a whole) set out the authority’s policies (however expressed) relating to the development and use of land in their area.</p> <p>2.4 Notwithstanding that the local development documents as a whole must be taken to be the authority’s policies for the area, legislation is clear on the primacy of the development plan (as opposed to all local development documents) in decision making. Section 38(6) of the Act states:</p> <p>“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.</p> <p>2.5 Section 19(2) of the Act goes further in stating that in preparing a local development document the local planning authority must have regard to, amongst other things:</p> <p>“(a)national policies and advice contained in guidance issued by the Secretary of State; (aa)the local development documents which are to be development plan documents;” (our emphasis)</p> <p>2.6 Not only are SPDs required to have regard to development plan documents, Section 17(5) of the Act makes clear that the ‘policies’ of local development documents must be given favour should any other part of local development documents present any conflict. It states:</p>	<p>Policy B2, and that any doubt that did exist can be further dispelled by the justification text for the Policy in the Local Plan:</p> <ul style="list-style-type: none"> <li>• Paragraph 5.7 states that, “The land will remain in its existing use if no development for local needs is proposed.”, and,</li> <li>• Paragraph 5.8 refers to, “A demonstration of the need for a particular development in the village...”</li> </ul> <p>Counsel is clear in his advice that he does not agree that the explanatory text seeks to introduce a requirement that does not appear within the policy, and therefore conflicts with the policy itself. He is clear in his view that Policy B2 only provides support to development that meets local needs, and accordingly, in order to obtain that support (and in accordance with the Policy), it is for an applicant for planning permission to demonstrate that its proposal fulfils that requirement.</p> <p><b>Section 3 of GTP’s Representation</b></p> <p>In this section of GTP’s representation, they state that:</p> <ul style="list-style-type: none"> <li>• A need for affordable housing was recognised within the evidence base for the DPD,</li> </ul>
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	<p>“(5)If to any extent a policy set out in a local development document conflicts with any other statement or information in the document the conflict must be resolved in favour of the policy.” (our emphasis)</p> <p>2.7 Regulation 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the Secretary of State’s general rules in relation to the form and content of local plans and supplementary planning documents. It states:</p> <p>“8.—(1) A local plan or a supplementary planning document must—</p> <p>(a)contain the date on which the document is adopted; and</p> <p>(b)indicate whether the document is a local plan or a supplementary planning document.</p> <p>(2) A local plan or a supplementary planning document must contain a reasoned justification of the policies contained in it.</p> <p>(3) Any policies contained in a supplementary planning document must not conflict with the adopted development plan.</p> <p>(4) Subject to paragraph (5), the policies contained in a local plan must be consistent with the adopted development plan.</p> <p>(5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.” (our emphasis)</p> <p>2.8 The above regulation makes clear that the role of an SPD is exactly that, it must supplement the adopted development plan and cannot conflict with it. Indeed, the Planning Practice Guidance (PPG) (at paragraph: 008 Reference ID: 61-008-20190315 [Revision date: 15 03 2019] sets out the role of supplementary planning documents. It states:</p> <p>“Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.” (our emphasis)</p> <p>2.9 The above legislative and policy context for the preparation of SPDs is unequivocally clear as to the role of SPDs and what they may contain. SPDs must provide only detailed advice and / or guidance on ‘policies’ within an adopted local plan. An SPD cannot introduce new planning policies into the development plan and must not conflict with the adopted development plan.</p>	<ul style="list-style-type: none"> <li>• Since adoption of the DPD the need for affordable housing within the Borough as a whole has continued;</li> <li>• There is a national housing crisis, to which the national policy objective of significantly boosting housing land supply is a response, and,</li> <li>• The proposed introduction of further requirements to Policy B2 by way of a need to demonstrate local need, in the face of a failure of Local Plan (and Policy B2) to deliver sufficient affordable housing across the Borough (and specifically Coupe Green) runs counter to the exact purpose of Policy B2.</li> </ul> <p>Counsel disagrees with the conclusion in the last bullet point that the Draft SPD imposes a requirement that is absent from Policy B2, as whilst the representation refer to Borough-wide or even national need for affordable housing, those measures of need are not “local need” to which Policy B2 is directed.</p> <p>As part of the Council’s evidence at the Local Plan Inquiry, in the document “Matter 5 – Other Plan Policies – Council’s Response to the Inspector’s Questions, it is stated that;</p> <p>“The purpose of policy B2 is to provide land outside the green belt to meet the future needs of the village over the plan period. These needs</p>
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	<p>2.10 Policy B2 of the Local Plan ‘Village Development’ is set out in full below:</p> <p>“Land on the periphery of Much Hoole, New Longton, Coupe Green and Mellor Brook is safeguarded to meet local needs as shown on the Policies Map. It will only be released during the Plan period for development (including local affordable housing, health care, community facilities or employment) which meets the following requirements:</p> <ul style="list-style-type: none"> <li>• The proposed development cannot be accommodated within the existing built-up area of the village, or this site is preferable for the use proposed. Evidence of this will be required.” (our emphasis)</li> </ul> <p>2.11 Policy B2 is clear that Sites safeguarded for ‘village development’ are to meet local needs. The policy sets out only 2 requirements for the policy to be engaged on sites which are safeguarded; that no alternative sites exist within the built-up area of the village, or the site is preferable for the use proposed.</p> <p>2.12 There is no requirement within Policy B2 for an applicant to demonstrate that a local need for development exists. As set out later within these representations, we consider that the need for development at these villages is implicit within the Local Plan and provided the need for such a policy to exist in the first place.</p> <p>2.13 Notwithstanding the above, the Council’s proposed SPD is predicated on the basis that Policy B2 requires an applicant to provide evidence of ‘need’ for development. Paragraph 2.1 of the draft SPD states:</p> <p>“The policy requires that any application for development on these sites provides evidence as to the local need for the development that is proposed”</p> <p>2.14 As a matter of fact, Policy B2 has no such requirement to demonstrate need and GTP considers that the SPD is based entirely on that incorrect assertion. The SPD seeks only to introduce tests which relate to a policy requirement that does not exist and, as such, has the effect of seeking to introducing new policies into the development plan. The introduction of such a policy conflicts with the policies of the adopted development plan. This is fundamentally against the principles of providing an SPD set out within the above legislation and within the PPG.</p> <p>2.15 Paragraph 2.2 of the SPD goes on to seek to justify the need for the SPD and states that:</p>	<p>could be affordable housing, community uses or employment needs.”</p> <p>This statement confirms that the purpose of Policy B2 is to meet the future needs of identified villages.</p> <p>The needs of those villages is also likely to fluctuate over the Local Plan period, and the level of need for affordable housing within a village is unlikely to remain constant over the full duration of the plan period.</p> <p>Within Section 3 of the response from GTP is a representation to the responsibility for demonstrating local need (specifically for affordable housing) lies with the Council instead of the applicants for planning permission. Counsel sees no reason why the applicant for a proposed development could not demonstrate the Local Need for affordable housing. In response to this representation and that of the Strategic Housing Officer, the SPD has been amended to state the following:</p> <ul style="list-style-type: none"> <li>• If the Council does not have an up-to-date Housing Needs Survey (within the last 5 years) for the settlement which the development is proposed, the Developer should undertake this survey. The scope of this Survey should be agreed in advance with the Strategic Housing Officer at the</li> </ul>
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	<p>“During the application process for recent applications on sites allocated under Policy B2, it became apparent that there was confusion over both the aims of the policy and evidence required to support development on these designations and in particular what constituted ‘Local Need’.”</p> <p>2.16 The above constitutes part of the reasoned justification for the creation of the SPD as required by Regulation 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012. However, GTP considers that such confusion can only lie in the fact that there is no such requirement for an applicant to demonstrate need within the policy and, as such, no guidance as to how such need should be defined. The assertion that Policy B2 includes a requirement to demonstrate a ‘local need’ is incorrectly repeated throughout the draft SPD.</p> <p>2.17 We consider, therefore, that the SPD fails to make an appropriate reasoned justification for the preparation of, or the content of the draft SPD in the context of the development plan.</p> <p>2.18 It is acknowledged that paragraph 5.8 of the Local Plan (providing the justification for the policy) does relate to local need. It states:</p> <p>“A demonstration of the need for a particular development in the village and that alternative site(s) could not accommodate such development will be provided to the Council through the submission of a supporting statement with accompanying evidence.”</p> <p>2.19 In the first instance, we consider that the above justification seeks to introduce a requirement for information that is not contained within the Policy itself and is conflicting with the policy requirements for development to be compatible with Policy B2. As set out within legislation, where wording of any part of a local development document conflicts with another, it is the ‘policy’ which must be given primacy. We consider that in light of the above conflict, it is not necessary for an application to demonstrate a ‘local need’ for development to be compatible with Policy B2.</p> <p>2.20 Secondly, as above, it is the role of supplementary planning documents to provide guidance and detail in relation to development plan ‘policies’. It is not the role of an SPD to derive additional policy tests which relates to the justification of those policies.</p> <p>2.21 Even were the Council to consider that the text within paragraph 5.8 of the Local Plan constituted a requirement of Policy B2 by virtue of the policy justification, that text is clear</p>	<p>Council, and the Town or Parish Council (where relevant)</p> <p><b>Reference to the Secretary of State</b></p> <p>GTP contend in their representation that the Council should refer the document to the Secretary of State. Whilst there is no statutory duty on the Council to do so, the Council intends to write to the Secretary of State, noting that;</p> <ul style="list-style-type: none"> <li>• The Council has produced the draft SPD and has undertaken consultation entirely in accordance with the 2012 Regulations;</li> <li>• One representation, from GTP, has made the request that the Secretary of State should intervene;</li> <li>• Unusually, GTP has also asked the Council to pass on that request to the Secretary of State;</li> <li>• In order to be entirely transparent, the Council has done so.</li> </ul> <p>The Council, will, however, make it clear in its submission to the Secretary of State that it vigorously resists the request for intervention and believes firmly that the request for intervention is wholly misplaced. The submission to the Secretary of State will be done at the same time as the publication of this Responses Report.</p>
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	<p>local need should be demonstrated via a supporting statement with accompanying evidence. As set out later within these representations, the proposed requirements of the draft SPD go far beyond the level of evidence that could be considered proportionate in relation to the purpose of the policy and would undermine the effectiveness of Policy B2 and the soundness of the Local Plan as a whole.</p> <p>2.22 With regard to the above, GTP considers that the SPD has been drafted and justified on the basis of a policy requirement that does not exist and therefore fails to meet the basic legislative requirements for an SPD and conflicts with the policies of an adopted development plan. Moreover, the SPD seeks to introduce new policy requirements to Policy B2 of the Local Plan which will effect its soundness; contrary to national planning guidance.</p> <p>2.23 We therefore respectfully request that the Council withdraw the SPD and, if this is something that the Council are unwilling to do, invite the Secretary of State to consider making a direction to prevent the Council adopting the SPD.</p> <p><b>3. SOUNDNESS OF THE LOCAL PLAN</b></p> <p>3.1 As set out above, it is GTP’s contention that there is no policy requirement within Policy B2 for an applicant to demonstrate that a local need for development exists. Indeed, it is considered that the need for development at the villages named within the Policy is implicit within the Local Plan and is the reason the need for such a policy exists in the first place.</p> <p>3.2 For the reasons set out below, GTP considers that the introduction of the SPD pulls against the justification for Policy B2, will limit the effectiveness of the policy in delivering for local needs, undermines the positive in which the Policy was written and is contrary to national planning policy. As such, we conclude that the introduction of the SPD will undermine the soundness of the Local Plan as set out in paragraph 35 of the NPPF.</p> <p>3.3 To understand the purpose of Policy B2 it is necessary to look at the introductory text for the policy at paragraph 5.4 of the Local Plan. It states:</p> <p>“Within the borough there are a number of villages that are tightly constrained by Green Belt boundaries. Development within these villages will be in accordance with Policy B1. In order to maintain the vibrancy of these villages, and provide opportunities for local investment and growth, the Council recognises that some development is needed on the periphery of the villages to accommodate local needs such as new community facilities or</p>		
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	<p>affordable housing. Land has been identified on the edge of Much Hoole, New Longton, Coupe Green and Mellor Brook as shown on the Policies Map.” (our emphasis)</p> <p>3.4 The Local Plan is unambiguous as to the need to provide land for development to meet local needs where the four villages mentioned within Policy B2 are tightly constrained by Green Belt. That development is required to help maintain the vibrancy of the villages and provide opportunities for growth. That need for development at designated B2 Sites is multifaceted, it is needed to meet local needs arising in those villages (which cannot be met elsewhere) as well as being needed to maintain the vibrancy of those villages.</p> <p>3.5 In light of the above, the need for affordable housing in particular is made clear in the evidence base for the development plan. Policy 7 of the Core Strategy which sets out the affordable housing requirements of the Central Lancashire Authorities and is based upon the 2009 Strategic Housing Market Assessment (SHMA) which estimated an annual shortfall of 660 units in South Ribble.</p> <p>3.6 During the course of the Local Plan’s Examination in Public (EIP) the Inspector raised with the Council at ‘Matter 5’ whether there was a need to provide for enabling development in order to secure the delivery of local affordable housing under Policy B2.</p> <p>3.7 In the Council’s response to the Inspector’s Matter 5 question (attached at Appendix 1 of these representations) the Council makes clear that Policy B2 is a response to the NPPF’s requirement for the provision of housing to meet the needs of rural areas (including the provision of affordable houses through rural exception sites where appropriate). It sets out that Policy B2 of the Site Allocations DPD identifies sites in the Borough “which the Council considers are appropriate to provide for local village development, including affordable housing”.</p> <p>3.8 At paragraph 1.4 of the Council’s Matter 5 Statement, the Council states:</p> <p>“The Council recognises the significant need for affordable housing in the Borough. Policy B2 aims to provide for village needs. These villages, New Longton, Much Hoole, Coupe Green, Mellor Brook, are all located within the green belt and the village boundaries are tightly constrained. The purpose of policy B2 is to provide land outside the green belt to meet the future needs of the village over the plan period. These needs could be affordable housing, community uses or employment needs.” (our emphasis)</p>		
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	<p>3.9 The Council are clear as to the overarching need for affordable housing within the borough and goes on to set out that the borough has, in recent times, performed poorly in the delivery of affordable housing. At paragraph 1.5 of the Matter 5 Statement the Council states:</p> <p>“It is the case that a limited number of affordable housing units on the rural exception sites allocated under South Ribble Local Plan (CD4.9) Policy D9 have come forward in the plan period to 2006.”</p> <p>3.10 The need for affordable housing at the time of publication of the Local Plan across the borough was clear.</p> <p>3.11 Since the adoption of the Local Plan in 2015 there the borough as a whole continues to have an overarching and significant need for affordable housing and the village of Coupe Green (and other B2 Villages) continues to be tightly surrounded by Green Belt. GTP cannot see any reasonable justification within the SPD to suggest that the needs for affordable housing across the borough, or indeed in the B2 Villages, have been met such that the justification applied to the adoption of Policy B2 no longer applies.</p> <p>3.12 By way of an update, the Central Lancashire SHMA was updated in 2017 and states that overall, in the period from 2014 to 2034 a net deficit of 620 affordable homes per annum is identified. There is thus a requirement for new affordable housing in the HMA and the Councils are justified in seeking to secure additional affordable housing. South Ribble’s need over that period is established as being om 235 affordable homes per annum.</p> <p>3.13 Indeed, the Country is recognised, across all political parties, as being in a state of national housing crises and the Government’s revised NPPF maintains a focus on the need to deliver a significant boost to housing; including the delivery of affordable housing. Affordable housing delivery at a local level has fallen short of the aspirations of the Local Plan and has averaged less than 50 units over the last 11 years (with a peak of 150 units in 2015/16). Crucially, the Council’s most up to date Housing Position Statement Strategic Housing Land Supply Assessment (March 2019) notes that none of that affordable housing has been delivered in Coupe Green or any of the other B2 Villages since the adoption of the Plan.</p> <p>3.14 GTP considers that the proposed introduction of further requirements to Policy B2 by way of a need to demonstrate local need, in the face of a failure of the Local Plan (and Policy</p>		
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	<p>B2) to deliver sufficient affordable housing across the borough (and specifically within Coupe Green) runs counter to the exact purpose of Policy B2 which</p> <p>is to deliver development to villages like Coupe Green to meet local needs and enhance its vibrancy.</p> <p>3.15 Introduction of such barriers runs equally contrary to thrust of the NPPF 2019 which states, at paragraph 77 and 78, that with regards to Rural Housing:</p> <p>“77. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.</p> <p>78. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” (our emphasis)</p> <p>3.16 Policy B2 of the Local Plan, in its current form, seeks to deliver development that is compatible with the NPPF 2019. There can be no doubt that the delivery of affordable housing at Coupe Green (or other B2 Sites) would enhance or maintain the vitality of rural communities, deliver opportunities for villages to grow and thrive and support local services. The introduction of the proposed SPD will serve only to lessen the effectiveness of Policy B2 in delivering those enhancements to the B2 villages by providing policy barriers to development.</p> <p>3.17 The detail of the SPD’s policy requirements are explored in greater detail later within these representations. However, in relation to the delivery of affordable housing, the trust of the SPD is that applicants will have to undertake their own Housing Needs Survey for the settlement in which the development is proposed to establish the number of affordable dwellings required (with development limited to that number). The SPD proposes that this would need to be undertaken by an independent experienced 3rd party.</p>		
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3.18 For the reasons set out above, we consider that such a requirement is completely unnecessary and that the overarching need for affordable housing is overwhelming such that affordable housing provision should not be restricted. Moreover, the benefits to B2 Villages and the wider borough would only increase were there to be an overprovision of affordable housing on B2 Sites.

3.19 Clearly, the level of evidence available at the time of adopting the Local Plan in relation to rural affordable housing need was considered to be sufficient and proportionate for the Inspector to consider the allocation of B2 village development Sites as sound as part of the Local Plan Examination. We consider that the level of evidence available demonstrates that need at least remains as significant as at the time the Local Plan was adopted.

3.20 Notwithstanding the above, should the Council consider that it is necessary to establish a settlement by settlement need for affordable housing need, that responsibility should lie with the Council, not with an applicant. Indeed, within the Council's Matter 5 Statement the Council seeks to assure the Inspector that it is in the process of commissioning a Housing Needs and Demands Survey to provide more up to date information on rural housing needs in terms of tenure, size and types of properties required. The Council anticipated that this work will be completed in June/July 2013. That work has not been forthcoming from the Council.

3.21 It is worthy of note that the EIP Inspector did not require that such evidence come forward to consider the allocation of B2 Sites to be sound and did not seek to modify Policy B2 to include a requirement for an assessment of Local Need be provided. Not only was the Inspector satisfied that further justification of the policy was not required, they also introduced a Main Modification of Policy B2 to remove the Council's proposed restriction in Policy B2 to prevent the delivery of open market dwellings at B2 Sites. It is clear that the intention of the Local Plan, as supported by the Secretary of State, is to see sites allocated under Policy B2 developed during the plan period.

3.22 In conclusion, with regard to the above, GTP considers that it is not necessary for the Council to require, via the proposed SPD, further evidence of local affordable housing needs where those needs are already clearly evidenced and exist in a context of an overwhelming borough wide need. To provide further policy barriers, such as the need to undertake a local housing survey, will hinder the delivery of affordable housing and runs contrary to the objectives of the development plan and national planning policy.

3.23 We therefore respectfully request that the Council withdraw the SPD and, if this is something that the Council are unwilling to do, invite the Secretary of State to consider making a direction to prevent the Council adopting the SPD.

**4. ADDRESSING THE POLICY REQUIREMENTS OF THE SPD**

4.1 The previous sections of these representations demonstrate the reasons why GTP consider that the SPD is unlawful and will undermine the soundness of the Local Plan as a matter of principle. We maintain that the Council should withdraw the SPD.

4.2 Notwithstanding the above, and without prejudice to that position, we set out below a commentary with regard to the detail of the policy requirements of the SPD which we request are taken into account should the Council, or the Secretary of State deem that progress with the SPD should be continued.

Context

4.3 Chapter 2 and 3 of the SPD sets out a number of times (at paragraph 2.1, 3.5 & 3.6) that the purpose of the SPD is to support the policy requirement within Policy B2 to demonstrate a 'local need' for development. As set out earlier within these representations, there is no such policy requirement within Policy B2 and the SPD should make that clear. The SPD relates only to the supporting text of that policy and compatibility with the SPD is not a policy requirement of the adopted development plan.

4.4 Paragraph 2.2 of the SPD notes that it has been prepared to help clarify to members what the aims of Policy B2 are (as well as how local needs should be demonstrated. Chapter 2 and 3 should make explicitly clear that Policy B2 is provided to help villages maintain their vibrancy by growing and providing an opportunity for investment. Policy B2 is a positively worded policy which seeks to deliver development for the benefits it will deliver; it is not a policy for the restriction of development and this should be made clear within the SPD.

4.5 Chapter 3 seeks to set out the Policy Context for the SPD and refers to the National Planning Policy Framework (NPPF). This section of the SPD refers only to paragraph 180 of the NPPF which relates to cumulative impacts of pollution, living conditions and the natural environment. We consider that this section should be expanded to include the relevant sections of the NPPF which underpin the need for Policy B2 in the first place, including

	<p>paragraph 77 and 78 of the NPPF which seeks to provide rural housing to support existing communities.</p> <p>Chapter 4 – Local Need for Housing</p> <p>4.6 Chapter 4 of the SPD seeks to require that a settlement-based demonstration of housing need is required to establish what the need for housing is within the settlement boundary. It also states that any need occurring within another settlement will not be considered acceptable.</p> <p>4.7 For the reasons set out above, we consider that this is an overly onerous requirement of the SPD. Housing need is not measured on a settlement by settlement basis at any level of plan making but is measured across a housing market area (HMA) in line with the requirements of national planning policy guidance (or via a standardised methodology in the case of new Local Plans).</p> <p>4.8 Such an assessment, across the HMA gave rise to the need for Policy B2 and the allocation of Sites for development at the B2 Villages. Policy B2 is compatible with paragraph 31 which requires the preparation of all policies to be underpinned by relevant and up-to-date evidence which should be adequate and proportionate. The Inspector at the EIP for the Local Plan was satisfied that Policy B2 was underpinned by sufficient evidence.</p> <p>4.9 It is unreasonable and unproportionate for the Council to require the undertaking of a new assessment of housing need at a scale that is simply not required as part of the plan making process. The need for development to enhance the viability of settlements which are restricted by Green Belt is evident (including for the reasons set out at paragraph 4.1 of the SPD) and there should be no requirement for applicants to undertake their own assessment of need which clearly already exists (and has worsened in each of the B2 Villages since the adoption of the Local Plan by virtue of now dwellings having been constructed in those villages).</p> <p>4.10 Furthermore, the undertaking of an Objectively Assessed Needs (OAN) assessment across the HMA allows needs to be calculated for a plan period by projecting forwards population changes, economic changes and allowing for market signals; all undertaken using available statistics. Such an assessment cannot be undertaken at a settlement wide scale and cannot robustly (in line with national guidance) project forward a housing requirement for the plan period. Such a local assessment would only, at best, provide a snapshot of the</p>		
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	<p>current need / shortfall of housing which has been generated to date by the planning system. Providing housing only to meet that need is a reactive process and will not plan for the needs of the settlements through the plan period; which is the purpose of Policy B2 and the Local Plan as a whole. Such a requirement should be removed from the SPD.</p> <p>4.11 In addition, should the above approach be taken to development, it is conceivable that the development of a B2 Village Site would be built out through a process of continual surveying and piece meal development to meet needs as they arise. Such an approach would lead to poorly planned development and would not make efficient use of land which has been allocated for development.</p> <p>Chapter 5 – Demonstrating a Local Need</p> <p>4.12 Chapter 5 builds on the requirements of Chapter 4 and sets out a methodology for assessment local needs.</p> <p>4.13 Paragraph 5.1 states that any evidence submitted to demonstrate a local need for affordable or open market housing will need to be corroborated by a suitably qualified independent individual whose identity has been agreed in writing by the Council.</p> <p>4.14 This requirement is completely unnecessary. In the first instance, an assessment of housing needs is the role of the Council and should be undertaken as part of the plan making process. The Planning Inspectorate, on behalf of the Secretary of State, takes on the role of independent assessor for that evidence. Any evidence provided as part of a planning application process is presented to the decision maker and its statutory consultees for assessment as set out by the requirements of planning legislation. The planning authority must take on that role and consider any evidence provided as part of a planning application.</p> <p>4.15 Paragraph 5.2 and 5.3 of the SPD go on to require a Local Housing Needs Survey where affordable housing is proposed which must be undertaken by an independent experienced 3rd party. Again, this is unacceptable.</p> <p>4.16 In the first instance, it is for the applicant to provide evidence that supports its application for development and for the Council to assess it. It is completely unreasonable for the Council to prevent an applicant employing a suitably qualified expert to demonstrate what the housing needs of an area are (should such a requirement be necessary). Indeed, it</p>		
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	<p>is very common for local planning authorities to employ external consultants to provide an assessment of their own housing needs within the plan making process.</p> <p>4.17 For the reasons set out above, we consider that the requirement for a Local Housing Needs Survey is unnecessary as a matter of principle where a Site has already been allocated for development to meet a known need for development. Any provision of affordable housing at the B2 villages will provide significant benefits and the limitation of affordable housing delivery to only cater for households which are in immediate need within the village now will not cater for the needs of the village over the plan period; as such, the thrust of paragraph 5.4 of the SPD should be amended to ensure that development at B2 Sites aims, as far as is feasible, to meet the minimum amount of development required at the B2 Settlements. Any need which can be seen now should not be regarded as the maximum permissible development.</p> <p>4.18 We support the recognition within paragraph 5.4 of the SPD that market housing will or may be needed to support the delivery of affordable housing and that the policy requirement (i.e. 35% should be seen as a reasonable benchmark to make the delivery of affordable housing viable).</p> <p>4.19 We consider that paragraph 5.5 of the SPD had the potential to be overly onerous. We agree that affordable housing should be provided in perpetuity, any affordable housing should be provided with a level of flexibility which seeks to provide housing in the first instance to local people but allows a wider area of search to be triggered should that housing not be taken up in a suitable timeframe. There is no wider benefit to the borough in having an empty affordable home in a settlement with someone else in housing need outside but in an adjacent settlement.</p> <p>4.20 The information sources set out at paragraph 5.6 of the SPD provide useful sources of information and applicants should be encouraged to provide data from those sources where available as part of their planning submission. However, as above, provision of affordable housing should not be limited to only need which has already arisen at a settlement. The Council should ensure that affordable housing development is boosted as far as possible to meet the future needs of the settlement (over at least the plan period), in line with the requirements of Policy B2 and the NPPF.</p>		
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	<p>4.21 The above conclusions apply equally to the SPD's proposed requirements for assessing market housing set out within paragraphs 5.7 – 5.9 of the SPD.</p> <p>Chapter 7 – Assessing Planning Applications</p> <p>4.22 Each planning application for development should be assessed on its own merits. We object to the Council's assertion that not every site allocated under Policy B2 will be appropriate for the same use. Indeed, the Council may find that each of the sites I required to meet an affordable housing need.</p> <p>4.23 As above, we object to the need for every application including housing to be accompanied by a Housing Needs Survey.</p> <p><b>5. CONCLUSIONS</b></p> <p>5.1 This representation has been prepared by Barton Willmore on behalf of Galliford Try Partnerships and provides comments on the Consultation Draft of the Supplementary Planning Document – 'B2 – Village Development'.</p> <p>5.2 Having reviewed this document and its supporting evidence GTP considers that the SPD has been erroneously drafted and justified on the basis of a policy requirement that does not exist and therefore fails to meet the basic legislative requirements for an SPD and conflicts with the policies of an adopted development plan.</p> <p>5.3 Moreover, the SPD seeks to introduce new policy requirements to Policy B2 of the Local Plan which will effect its soundness; contrary to national planning guidance. The SPD will undermine Policy B2 insofar as it was adopted as a policy which was positively prepared, effective, justified and consistent with national policy.</p> <p>5.4 The content and detailed policy requirements of the SPD are unreasonable and disproportionate insofar as they require an assessment of need which would not ordinarily be undertaken as part of the plan making process. Such an assessment will lead to ad hoc development which meets only shortfalls which have already occurred and will not meet the needs of settlements for the plan period; contrary to the purpose of the Local Plan.</p> <p>5.5 Overall, the SPD is considered to add nothing positive to the plan making process and will seek only to further stifle the delivery of much needed development at the B2 villages which, to date, has not been delivered by Policy B2 in any of the B2 Villages identified.</p>		
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5.6 We therefore respectfully request that the Council withdraw the SPD and, if this is something that the Council are unwilling to do, invite the Secretary of State to consider making a direction to prevent the Council adopting the SPD.

#### **APPENDIX 1**

#### **Council's Response to Matter 5 of the EIP for the South Ribble Local Plan**

#### **CD5.5.0**

**Matter 5 – Other Plan Policies – the Council's Response to the Inspector's Questions**  
**Does the Plan take a justified approach to all policy matters? Is such an approach consistent with national planning policy?**

#### **Chapter A – Infrastructure**

**1. What implications, if any, will the Community Infrastructure Levy have on the provision of infrastructure having regard to the Plan requirements?**

1.1. In answering the above question it is useful to put the infrastructure development envisaged in association with the Plan into the wider historical context.

1.2. The Central Lancashire Core Strategy (CS) (SRE002) sought to bring forward proposals in two ways:

☒ Allocate land to be developed as fully fledged Strategic Sites where there is a high degree of certainty over delivery.

☒ Indicate the approximate extent of Strategic Locations within which land will be allocated for development in later Development Plan Documents

1.3. The above results in two main areas of substantive new build development:

☒ Policy 4: Housing Delivery, envisages a total of 22,158 dwellings in the plan period up to 2026, with 417 per annum in South Ribble Borough

☒ Policy 9: Economic Growth and Employment, identifies 454 hectares of employment land for development between 2010 and 2026.

1.4. An Infrastructure Delivery Schedule (IDS) (CD5.5.1) was prepared in March 2011 for submission to the CS Examination and subsequently updated in January 2012 as part of the CIL preparatory work, which itemised the infrastructure projects already envisaged or probably needed after taking account of the quantity and broad location of development

	<p>proposed in the CS and to record their likely implementation timescales, costs, sources of funding and deficits.</p> <p>1.5. In his final report the CS Inspector was of the view that the IDS identified infrastructure projects that will probably be needed to support the quantity and broad location of development which the Local Plan (CD4.9) proposes. He considered it thorough and comprehensive in its approach, and concluded that it along with the Performance Monitoring Framework an essential management tool in delivering the strategy of the local plan.</p> <p>1.6. The County Council as Highways Authority did not raise objection in principle to the CS's proposals, but with the caveat that there must come a point where additional traffic can no longer be accommodated without unacceptable impacts or the need for much wider strategic infrastructure improvements to support further development. To this end the County Council stated it would be appropriate to produce a Highways and Transport Master Plan as a prerequisite to informing the production of detailed proposals for additional infrastructure to come forward, particularly at the Strategic Locations. The Inspector acknowledged that this was a sensible approach.</p> <p>1.7. In response to the above the County Council has worked up a Highways and Transport Masterplan (CD4.3). It sets out the County Council's ideas for future highways and transport strategy for Central Lancashire up to 2026 and beyond. In particular it states that it considers the impact of development plans on the area in the future, including the approved Central Lancashire Core Strategy.</p> <p>1.8. With reference to CIL and funding generally it states:</p> <p><i>"Funding for this masterplan will come from many sources, not all of them public. A further component of the Local Development Framework is the 'charging schedule' for the new Community Infrastructure Levy (CIL)"</i></p> <p>.....</p> <p><i>"The Core Strategy has put in place one single development plan for all the Central Lancashire area. The economic growth of all 3 districts is therefore interlinked and dependent on the success of the strategic locations that have now been adopted by all 3 districts. The infrastructure to support this development is also one single integrated solution</i></p>		
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*to the need to provide for development in Central Lancashire and as such will draw on the CIL raised in all 3 districts to provide a significant element of funding for the programme.”*

1.9. The Masterplan itemises the funding needed to support the plan (CS) and having considered all funding streams, specifically seeks CIL funding of £97.2 million over the period 2013/14 to 2022/23 from the three Central Lancashire Authorities. The infrastructure projects envisaged in the Masterplan have been included within the Draft 123 List (January 2013) (CD4.13), which has been prepared in accordance with Regulation 123(2) of the Community Infrastructure Levy Regulations 2010, (CD4.15) and itemises the infrastructure that will in full or in part be funded by CIL. This 123 List forms one of the supporting documents submitted to the CIL ‘Examination’, as discussed below.

1.10. The South Ribble DPD (SRSD001) discusses the need for a variety of infrastructure which reflects the projects in the IDS and states that this may be delivered via CIL or S106 contributions and has specific policies A2 and A3 which seek to deliver two key pieces of highway infrastructure:

☒ A2 – The Cross Borough Link Road

☒ A3 – The Completion of the Penwortham Bypass.

1.11. The LCC Transport Masterplan promotes the delivery of one element of this infrastructure, the Penwortham Bypass. The South Ribble DPD at Policy A2 advises that the Cross Borough Link Road will be provided through either CIL and/or developer contributions and completed within an agreed timescale.

1.12. The DPD is currently being updated to reflect the progress that has been made with the Masterplan with particular reference to the South Ribble Western Distributor, which includes A582 improvements plus the Penwortham Bypass.

1.13. DCLG Community Infrastructure Levy Guidance December 2012, (CD4.17) paragraph 8, requires local authorities progressing CIL to explain how the proposed levy rates will contribute towards the implementation of the development plan (which in this case comprises the Core Strategy and Site Allocations Development Plan Documents) and support development of the area.

1.14. The CIL Charging Schedules (CD4.16) are currently going through the prescribed stages towards adoption they were submitted to the Inspectorate for ‘Examination’ on 1 February

	<p>2013, and the examination should take place within ten weeks of this date. The proposed levy rates were subject to extensive viability work which concluded that they are set at a level that should not prejudice development and will not be the determining factor as to whether a development is viable.</p> <p>1.15. Provisional estimates of the income that will be generated from CIL suggest if all of the houses and employment land in the CS comes forward for development, then depending on assumptions, such as intensity of development, a range of £114 to £122 million will be generated.</p> <p>1.16. This income equates approximately to the CIL funding sought to implement the Masterplan. Therefore CIL funding should facilitate the highway infrastructure to allow the development envisaged in the plan both through:</p> <ul style="list-style-type: none"><li>☐ The Transport Masterplan, which seeks to develop the Penwortham Bypass.</li><li>☐ The proposed Cross Borough link road which seeks part funding from CIL as set out in Policy A2 of the Plan.</li></ul> <p><b>Conclusion</b></p> <p>1.17. The Core Strategy Examiner was of view that the infrastructure identified in the Infrastructure Delivery Schedule was that probably needed to support the quantity and broad location of development which the Strategy proposes.</p> <p>1.18. It was acknowledged at the time that a Master Plan was necessary to facilitate the highways infrastructure needed, which includes the Penwortham Bypass, within South Ribble Borough.</p> <p>1.19. This exercise has been completed and a CIL contribution of £97.2 million is sought from CIL.</p> <p>1.20. The CIL income envisaged from the main quantum of built development in the CS equates to a range of £114 to £122 million.</p> <p>1.21. Therefore in accordance with Paragraph 8 of the Community Infrastructure Guidance December 2012, it is considered that the CIL will contribute positively towards the implementation of the development plan by seeking to initially provide the highway</p>		
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	<p>infrastructure needed to facilitate the development prescribed within the plan and when funding allows the other infrastructure projects during the plan period.</p> <p><b>2. Does policy A1 pay adequate attention to the needs of all users of the transport network? Is the approach justified?</b></p> <p>2.1. Policy A1 aims to ensure that new development contributes to the mitigation of any resultant impacts on all types of infrastructure. Sections a) to h) of the policy list the types of infrastructure for which a contribution may be sort, but makes it clear contributions are not limited to those expressly stated in the policy. Part c) of the Policy makes reference to transport infrastructure. The Council acknowledges that bridleway users are an important user of the highway network and should be referenced in the policy. A minor modification is being proposed to include this reference in part c) of the policy. (Minor Modifications Document Ref SRSD007a, number 5)</p> <p><b>3. Is the provision of the Cross Borough Link Road (Policy A2) justified and deliverable having regard to the evidence?</b></p> <p>3.1. Policy A2 describes the Cross Borough link Road in two sections, firstly from Carrwood Road to The Cawsey and secondly extending through the Pickering’s Farm site.</p> <p>3.2. This statement shall describe the justification and deliverability for both sections in turn.</p> <p><b>Policy A2 a) Section from Carrwood Road to The Cawsey.</b> <b>Policy Background</b></p> <p>3.3. There is a long established policy background for this section of the Cross Borough Link Road(CBLR).</p> <p>3.4. In 1982 Central Lancashire Development Corporation obtained planning permission from the Secretary of State for residential development at Walton Park, the residential estate immediately to the north east of the CBLR. This incorporated a safeguarded corridor to permit the construction of the CBLR to the Lostock Hall Gasworks site.</p> <p>3.5. The section of the CBLR from Carrwood Road roundabout to the eastern edge of the Lostock Hall gasworks site was included in the Walton le Dale, Bamber Bridge, Lostock Hall</p>		
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	<p>Local Plan adopted in 1986. The South Ribble Local Plan (CD4.9), adopted Feb 2000, continued this commitment in Policy T3.</p> <p>3.6. The Policy stated that:</p> <p><i>'A road will be constructed from the roundabout on Carrwood Road to Leyland Road in the vicinity of Bee Lane in order to open up land for development and to serve as a local through route. Traffic management measures will be undertaken on Leyland Road in order to limit any increase in road space for cars.'</i></p> <p>3.7. The adopted Central Lancashire Core Strategy (July 2012) in Policy 3 Travel section h) ii) references the completion of a new road from Walton Park through to Lostock Hall. Policy A2 of the Site Allocations DPD carries through this policy intention.</p> <p><b>Justification for the CBLR</b></p> <p>3.8. At the time of the South Ribble Local Plan Inquiry, the Inspector when considering objections to Policy T3, identified that the road would bring substantial benefits in terms of its contribution to the strategy of the Local Plan, the achievement of sustainable development, the restructuring of the local economy and the improvement of conditions on Brownedge Road and Leyland Road.</p> <p>3.9. The CBLR is instrumental in opening up a number of sites for re-development.</p> <p>3.10. South Ribble Local Plan Policy in Policy EMP6 allocates the Lostock Hall Gasworks site for a mixed employment/residential/commercial. In addition South Ribble Local Plan Policy HP1 allocated a residential development on Site f ) Land East of Leyland Road. The Local Plan stated the need for both developments to contribute to the proposed link road in order to secure the infrastructure needed to enable their redevelopment.</p> <p>3.11. These allocations are carried forward as Sites H and K of Policy D1 - Allocation of Housing Land in the Submission Version Site Allocations DPD and extended to include Site DD the Gas Holders site, Lostock Hall. The need for the CBLR to provide the highway infrastructure to enable these sites to come forward remains.</p> <p>3.12. In addition to the above, the CBLR results in significant benefits with regard to improving local access in an East - West direction across the Borough to facilities including local retail and employment uses. It will improve access to the A6, the Capitol Centre Retail</p>		
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Park and, Preston City Centre. It results in the re distribution of existing local traffic, which will result in the reduction in traffic at the Tardy Gate junction on Leyland Road and Brownedge Road. This reduction enables public realm improvements to be made at the Tardy Gate District Centre, improving its attractiveness and accessibility for users.

**Deliverability**

3.13. In December 2006 National Grid submitted an outline planning application for the redevelopment of the Lostock Hall Gasworks site (12.1 HA) for a mixed use development including employment (B1, B8) Local Centre (A1, A2, A3, A4, A5) and residential development (C3) and associated access road.

3.14. In May 2007, a complementary application for the construction of a road bridge to link Carrwood Road and The Cawsey, providing access over the Preston Junction Nature Reserve was submitted by South Ribble Borough Council. Both applications were presented to committee and resolved to approve subject to Section 106 agreements. These applications were not progressed due to the downturn in the economy and certain commercial issues.

3.15. In January 2013 resubmissions of both applications were submitted to the Borough Council and these are in the process of determination.

The only alteration is that now the mixed use application on the Gasworks site no longer proposes employment uses (B1,B8).

3.16. Agreement has been reached in principle with the applicant National Grid that the Link road and Bridge will be funded and delivered as part of their residential scheme. This would be secured through a Section 106 agreement which is currently being re-negotiated.

**Policy A2 b) Section through the major development site of Pickering's Farm**

3.17. The section of the CBLR running from Leyland Road to the A582 through the Pickering's Farm major residential allocation provides access through this development and provides a link from the A582 to the first section of the CBLR.

3.18. The Development Statement for this site prepared by the HCA and Taylor Wimpey, referred to in detail in Matter 2, includes a Section on Infrastructure and outlines the Transport Strategy for the site. This document states that the main vehicular access points to the site will be taken from Penwortham Way(A582) with a secondary access from Chain

	<p>House Lane. The extension of the CBLR from Leyland Road to Penwortham Way is outlined with the exact detail and specification of this road to be agreed. The conclusion section of the Development Statement outlines the benefits of the Pickering’s Farm development in particular:</p> <p><i>‘enabling the completion of a key highways link, connecting Penwortham Way (A582) to Leyland Road; this is deliverable through the land controlled by the HCA and Taylor Wimpey.’</i></p> <p>3.19. This extended section of the CBLR, is needed to further improve east-west access across the Borough and extend the benefits of the first section of the CBLR, increasing local access to facilities and assisting to reduce traffic flows on the local road network in particular at Tardy Gate, Leyland Road/Brownedge Road junction.</p> <p>3.20. The Council accepts that further work is required in relation to the specific route, the design and specification of this section of the link road. This will be undertaken with the landowners, HCA, Taylor Wimpey and the Highway Authority. Consideration will also be required of the overall scheme viability to ensure flexibility with regard to infrastructure delivery.</p> <p>3.21. The Cross Borough Link Road is included in the Community Infrastructure Levy Draft Regulation 123 List of potential infrastructure schemes to be funded through CIL. This recognises that as stated in the policy, the link road will be funded through either CIL and /or developer contributions.</p> <p>3.22. In order to give further clarity to the role and purpose of the Link Road, the Borough Council is proposing some minor modifications to the justification to this policy. These will be outlined in the Statement of Common Ground agreed between the Borough Council and Lancashire County Council.</p> <p><b>Chapter B – Areas for Development</b></p> <p><b>1. Is there a need to provide for enabling development in order to secure the delivery of local affordable housing under Policy B2?</b></p> <p>1.1. Paragraph 54 of the NPPF (CD4.7) considers the provision of housing to meet the needs of rural areas including the provision of affordable houses through rural exception sites where appropriate. It goes on to state that local planning authorities should in particular</p>		
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	<p>consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.</p> <p>1.2. Policy 7 of the Central Lancashire Core Strategy concerns Affordable and Special Needs Housing and in Part (a) of the policy requires 100% provision of affordable housing in respect of rural exception sites. This policy was found to be sound by the Inspector and in his report at paragraph 61 he states that:</p> <p><i>'There is a realistic prospect that the Local Plan will deliver a reasonable number of affordable homes in the plan period'</i></p> <p>1.3. Policy B2 of the Site Allocations DPD (SRSD001) identifies sites in the Borough which the Council considers are appropriate to provide for local village development, including affordable housing, health care, employment and community uses.</p> <p>1.4. The Council recognises the significant need for affordable housing in the Borough. Policy B2 aims to provide for village needs. These villages, New Longton, Much Hoole, Coupe Green, Mellor Brook, are all located within the green belt and the village boundaries are tightly constrained. The purpose of policy B2 is to provide land outside the green belt to meet the future needs of the village over the plan period. These needs could be affordable housing, community uses or employment needs. Allowing the development of market housing here, would reduce the opportunity to meet the wider development needs of the village, needs which may emerge over the plan period.</p> <p>1.5. The Council acknowledges that the performance in delivering affordable housing over the last five years has been limited. This has been evident across the Borough as a whole, and is not specific to the rural areas. It is considered that the reasons for this are a combination of factors including the economic downturn, reduced rates of market house building and funding issues for Registered Providers. It is the case that a limited number of affordable housing units on the rural exception sites allocated under South Ribble Local Plan (CD4.9) Policy D9 have come forward in the plan period to 2006. This does not by itself indicate that these particular rural sites are not viable, or that some form of enabling development is required to bring these sites forward. It simply reflects the Borough wide picture.</p>		
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	<p>1.6. The Central Lancashire Affordable Housing SPD (Document Ref SRE003) was adopted in October 2012 and Section H of the document gives guidance on Rural Exceptions as referenced in Core Strategy Policy 7.</p> <p>1.7. Paragraph 55 of the SPD states that:</p> <p><i>'In providing for affordable housing in rural communities, the aim set out in NPPF, is to be responsive to local circumstances and plan housing development to reflect local needs. Clear independent evidence of an identified local need for affordable housing is a prerequisite to considering whether, in line with the NPPF, allowing some market housing would facilitate the provision of affordable housing. Rural exception sites should provide 100% affordable housing as set out in Policy 7 of the Core Strategy.'</i></p> <p>1.8. In line with the above guidance, it is clear that Policy B2 sites, which are in effect rural exception sites, should provide 100% affordable housing.</p> <p>1.9. The NPPF (CD4.7) in paragraph 54, states that a local planning authority should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. The guidance in the Affordable Housing SPD recognises this and allows consideration of other sites in rural areas for market housing. Each site would be considered on its individual merits. An assessment of the local affordable housing need in the proximity of the site would be required and a demonstration of how such a scheme will meet these local needs.</p> <p>1.10. The Council is in the process of commissioning a Housing Needs and Demands Survey. This will provide more up to date information on rural housing needs in terms of tenure, size and types of properties required. It is anticipated that this work will be completed in June/July 2013.</p> <p>1.11. In conclusion, Policy B2 complies with Core Strategy Policy 7 and the Affordable Housing SPD, which in turn are consistent with the NPPF. No alteration to Policy B2 is therefore considered necessary.</p> <p><b>2. Is there a need for the comprehensive development of South Rings Business Park (Policy B3) through a masterplan?</b></p>		
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	<p>2.1. The South Rings Business Park, extends to an area of approximately 16.2 hectares, and is designated as employment land under Policy EMP 1 of the South Ribble Local Plan (referenced as Site A). Outline planning permission for a mixed use development comprising A1, A3,B1,B2,B8 and C1 uses was granted by the Secretary of State following a 'call in' on 10 February 2000. This outline application was accompanied by a masterplan for the site, setting out the uses of various parcels of land. Subsequently a number of reserved matters applications have been approved for a B&amp;Q store (A1 use), Holiday Inn (C1 use), Burger King (A3 use), public house and offices (B1 use) for Places for People.</p> <p>2.2. The southern half of the site remains undeveloped and is continued to be marketed.</p> <p>2.3. The Council is supportive of proposals to attract further investment in to the undeveloped southern part of the site and also facilitate appropriate re development and changes of use where proposed. However such proposals need to be developed in a coordinated way so that the existing employment uses and retail offer are protected and it can be ensured that any proposed uses are appropriate and complementary to the site as a whole. In order to achieve this, the Council considers that the preparation of a revised masterplan for the site would be appropriate.</p> <p>2.4. Following consideration of the representation submitted by the landowner, Muse Developments through their agent HOW Planning (Representation ref 122), a Minor Modification to Policy B3 is proposed to alter the wording of the policy so that a masterplan may be submitted as part of a planning application ( Minor Modification document SRSD007a, number 6).</p> <p><b>Chapter G – Natural &amp; Built Environment</b></p> <p><b>1. Does the plan have adequate regard to the need to protect biodiversity? Are designated sites adequately referred to?</b></p> <p>1.1. Since the introduction of the National Planning Policy Framework (NPPF) the Council recognises further policy work may be needed with regard to biodiversity and more specifically the issue of ecological networks.</p> <p>1.2. The Council in particular notes the following paragraphs of the NPPF:</p>		
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	<p>☑ 'Minimising impacts on biodiversity and providing net gains in biodiversity, where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures' (Paragraph 109, Page 25/26, NPPF).</p> <p>☑ 'Local Planning Authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks' (Paragraph 113, Page 26, NPPF).</p> <p>☑ 'Local Planning Authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure' (Paragraph 114, Page 26, NPPF).</p> <p>1.3. Having had discussions with Lancashire Wildlife Trust (LWT) and Lancashire County Council (LCC) ecologists in relation to their received representations the Council has agreed to draft a biodiversity policy that relates to ecological networks and the hierarchy of designated biodiversity sites, where it considers that there is a policy gap (CD5.5.1). The Central Lancashire Core Strategy Policy 22: Biodiversity and Geodiversity and accompanying justification text does discuss opportunities to 'conserve, protect, and seek opportunities to enhance and manage the biological and geological assets ... seeking opportunities ... to enhance and expand ecological networks' (Policy 22). Paragraph 10.23 aligns to the hierarchy of designated biodiversity assets and paragraphs 10.24 – 10.25 expand upon ecological networks. The Council accepts that to ensure compliance with NPPF (CD4.7) further policy wording is required within the Plan to complement the strategic approach taken in the Central Lancashire Core Strategy (SRE002).</p> <p>1.4. See suggested wording for a draft biodiversity policy and justification text in CD5.5.1. This will form part of our agreed Statement of Common Ground with LWT and LCC. If the Inspector is minded, the Policy will be consulted upon after the hearings and before formal adoption of the Plan.</p> <p>1.5. Additionally, the Council has agreed to produce an SPD covering guidance on issues such as green infrastructure, biodiversity requirements including surveys and mitigation</p>		
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measures and guidance relating to ecological networks. The SPD will aim to be adopted by 31 March 2014 and will have due consideration to public consultation through the formal preparation of the SPD and its subsequent adoption. LWT and LCC will be fully engaged within the preparation process.

**2. Are policies G1 and G2 consistent with the NPPF?**

2.1. The Council is satisfied that Policy G1 'Green Belt' and Policy G2 'The Re-Use and Adaptation of Buildings in the Green Belt' are essentially consistent with the NPPF (subject to one or two minor comments at the end of this section). As referenced below the NPPF (CD4.7) remains committed to the Green Belt and the need to preserve it to prevent urban sprawl through protecting the openness and permanence of the Green Belt. Policy G1 and Policy G2 are fully supportive to the overall policy aim of the Green Belt and set out criteria where development may be acceptable in line with the NPPF requirements.

2.2. In this context the Council in particular notes the following paragraphs of the NPPF:

☐ 'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence' (Paragraph 79, Page 19, NPPF).

☐ Paragraph 80 (Page 19) of the NPPF which sets out the five purposes of Green Belt the Council's approach is wholly consistent with these purposes.

☐ 'Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retains and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land' (Paragraph 81, Page 19, NPPF).

☐ 'Local Planning Authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan' (Paragraph 83, Page 20, NPPF).

☑ 'As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances' (Paragraph 87, Page 20, NPPF).

2.3. In view of the NPPF requirement to protect the Green Belt, the Council is compliant with this as it seeks to preserve the Green Belt boundary from the Local Plan 2000 (CD4.9) as it is, with the minor exception of a Green Belt review within the designated Enterprise Zone at BAE Systems in Samlesbury.

2.4. As alluded to above there are a few small areas where Policy G1 does not directly replicate national policy such as community forests, community right to build, mineral extraction etc. Paragraphs 90 – 92 of the NPPF are of direct relevance here. However, as these issues are presented within the NPPF the Council does not feel it is necessary to replicate national policy within the Plan in these instances.

**3. Are the allocations of safeguarded sites (policy G3), Protected Open Lane (G4) and Green Corridors (G12) justified having regard to the alternatives and the availability of land for housing?**

3.1. Yes, the Council is satisfied that the proposed allocations of the Safeguarded Sites, Protected Open Land and Green Corridors are justified having regard to the alternatives and the availability of land for housing. Included below are a series of tables which provide evidence for the above listed proposed allocations and detail their past allocation, proposed future allocation and justification for this approach.

Safeguarded Sites Site Name	Proposed Allocation	Local Plan Allocation	Justification
South of Factory Lane and east of the West Coast Main Line	Safeguarded Land	Safeguarded Land	This site was safeguarded in the Local Plan (2000) for future development. When a review of all safeguarded sites was undertaken as part of the Site Allocations process it was seen that due to the amount of development coming forward in this area, mainly due to the proposed Major Site at Pickering's Farm, that it would be inappropriate due to Infrastructure requirements to bring all of the

				<p>safeguarded land forward at the same time within this plan period. The lower half of this site has since received planning permission for market housing on appeal.</p>		
	<p>Southern area of the Major Development Site at Pickering's Farm, Penwortham</p>	<p>Safeguarded Land</p>	<p>Safeguarded Land</p>	<p>This site was safeguarded in the Local Plan (2000) for future development. When a review of all safeguarded sites was undertaken as part of the Site Allocations process it was seen that due to the amount of development coming forward in this area, mainly due to the proposed Major Site at Pickering's Farm, that it would be inappropriate due to Infrastructure requirements to bring all of the safeguarded land forward at the same time within this plan period.</p>		
	<p>South of Cote Lane, Chain House Lane, Farington</p>	<p>Safeguarded Land</p>	<p>Safeguarded Land</p>	<p>This site was safeguarded in the Local Plan (2000) for future development. When a review of all safeguarded sites was undertaken as part of the Site Allocations process it was seen that due to the amount of development coming forward in this area, mainly due to the proposed Major Site at Pickering's Farm, that it would be inappropriate due to Infrastructure requirements to bring all of the safeguarded land forward at the same time within this plan period.</p>		
	<p>Church Lane, Farington</p>	<p>Safeguarded Land</p>	<p>Safeguarded Land</p>	<p>This site was safeguarded in the Local Plan (2000) for future development. When a review of all safeguarded sites was undertaken as part of the Site Allocations process it was seen that due to the</p>		

	<p>Land off Emnie Lane, Leyland      Safeguarded Land      Safeguarded Land</p> <p><u>Protected Open Land</u></p> <p>3.2. Sites proposed for allocation within the Plan as 'Protected Open Land' were brought forward from the Local Plan (2000), previously allocated as either Policy D9: Local Needs in Villages or Policy D1 (e) Countryside Areas.</p> <table border="1"> <thead> <tr> <th data-bbox="421 1042 571 1066">Site Name</th> <th data-bbox="622 1042 772 1090">Proposed Allocation</th> <th data-bbox="846 1042 974 1090">Local Plan Allocation</th> <th data-bbox="1025 1042 1153 1066">Justification</th> </tr> </thead> <tbody> <tr> <td data-bbox="421 1094 571 1161">School House Farm, Liverpool Road</td> <td data-bbox="622 1094 772 1142">Protected Open Land</td> <td data-bbox="846 1094 974 1142">Countryside Designation</td> <td data-bbox="1025 1094 1400 1385">This site is located within Hutton on the boundary of the settlement and Green Belt. The site was a countryside designation in the Local Plan (2000) which had a similar yet more flexible function than the Green Belt. An adjacent site (Site N) which was allocated as Safeguarded within the previous Plan has been proposed for residential allocation to enable some development to occur in this area. It was not considered</td> </tr> </tbody> </table>	Site Name	Proposed Allocation	Local Plan Allocation	Justification	School House Farm, Liverpool Road	Protected Open Land	Countryside Designation	This site is located within Hutton on the boundary of the settlement and Green Belt. The site was a countryside designation in the Local Plan (2000) which had a similar yet more flexible function than the Green Belt. An adjacent site (Site N) which was allocated as Safeguarded within the previous Plan has been proposed for residential allocation to enable some development to occur in this area. It was not considered	<p>amount of development coming forward in this area, mainly due to the proposed Major Site at Pickering's Farm, that it would be inappropriate due to Infrastructure requirements to bring all of the safeguarded land forward at the same time within this plan period.</p> <p>This site was suggested during the Issues and Options and Preferred Options stage of the Site Allocations process as a potential site to be brought forward within this plan period for employment land. However, due to a wide number of objections from nearby residents, the allocation of Land off Altcar Lane for residential development which would create a significant amount of development activity and the lack of need for additional employment land to be allocated through this process, it was decided that this site should remain safeguarded for future development to be assessed within the next plan period.</p>		
Site Name	Proposed Allocation	Local Plan Allocation	Justification									
School House Farm, Liverpool Road	Protected Open Land	Countryside Designation	This site is located within Hutton on the boundary of the settlement and Green Belt. The site was a countryside designation in the Local Plan (2000) which had a similar yet more flexible function than the Green Belt. An adjacent site (Site N) which was allocated as Safeguarded within the previous Plan has been proposed for residential allocation to enable some development to occur in this area. It was not considered									

				<p>appropriate due to the scale of the area and its position within the hierarchy in Policy 1: Locating Growth in the Central Lancashire Core Strategy, to allocate this site for development and so the new allocation of Protected Open Land was considered appropriate.</p>		
	<p>Site South of Chapel Lane between Site M and Site Q</p>	<p>Protected Open Land</p>	<p>Countryside Designation</p>	<p>There are a number of sites within Longton which have been allocated for residential development, according with its position on the hierarchy in Policy 1: Locating Growth in the Central Lancashire Core Strategy. However, allocating all of the suggested sites would have been to allow a greater scale of development then was appropriate for the area. These sites have been proposed for allocation as protected open land to preserve the openness of the settlement in this area.</p>		
	<p>Site at Howick Hall Farm (Galloway)</p>	<p>Protected Open Land</p>	<p>Safeguarded</p>	<p>This site was Safeguarded for future development in the Local Plan (2000); however it is no longer considered appropriate for this site to be developed. There is a Biological Heritage Site covering the designation and due to the importance of designated biodiversity sites within the National Planning Policy Framework it is no longer considered appropriate to allocate as Safeguarded and as such the proposed allocation now relates to Protected Open Land.</p>		
	<p>Land off Daub Hall Lane</p>	<p>Protected Open Land</p>	<p>Local Needs in Villages</p>	<p>This site was no longer considered appropriate for local needs in villages due to its location at the edge of the settlement bordering on to the Green</p>		

				<p>Belt boundary. As a result a site in a more sustainable location has been proposed for Village Development in Coupe Green where it is considered there is a need and this site was seen as more appropriate for Protected Open Land.</p>		
	Land Adjacent to the Fields*	Protected Open Land	Local Needs in Villages	<p>This site was no longer considered appropriate for local needs in villages due to its location at the edge of the New Longton settlement where development for community facilities would not have been in the most sustainable location. As a result a site in a more sustainable location has been proposed for Village Development and this site was seen as more appropriate for Protected Open Land.</p>		
	Land off Long Moss Lane*	Protected Open Land	Local Needs in Villages	<p>This site was no longer considered appropriate for local needs in villages due to its</p>		

	<p>Land off Long Moss Lane*</p>	<p>Protected Open Land</p>	<p>Local Needs in Villages</p>	<p>This site was no longer considered appropriate for local needs in villages due to its</p>		
<p>3.3. It is worth commenting on these sites * that applications for market housing have been received. Land off Long Moss Lane has received planning permission for 27 dwellings at an appeal and the Council is awaiting the decision on an appeal for an application for market housing on Land Adjacent to the Fields.</p>						
<p><b>Green Corridors</b></p>						
<p>3.4. The sites that are proposed as Green Corridors within the Plan were carried forward from the Local Plan (2000) previously covered as Policy D10: Green Wedges (see below). The aim of the policy was to preserve areas of openness acting as a buffer to separate between developments and provide areas to enable access and potential recreational opportunities. It was considered appropriate to carry this designation forward into the Plan as the Green Corridors only occur within the existing built up area in the centre of South Ribble where their existence may be the only green buffer opportunity between developments.</p>						
<p><b>Policy D10: Green Wedges</b>          Planning permission will not be granted for development which would disrupt or destroy the visual or spatial continuity of open land within a green wedge.</p>						
<p>3.5. The Central Lancashire Core Strategy Policy 18: Green Infrastructure discusses the need to (b) invest in and improve the natural environment, particularly; iii. where it contributes to the creation of green wedges and the utilisation of other green open spaces that can provide natural extensions into the countryside. Justification text in in paragraph 10.21 also discusses the wider benefits of green wedges and their role as providing 'substantial areas of open space which lie within the main urban areas ... providing links to open countryside and acting as wildlife corridors. As referenced in the Council's response to Matter 1 there is a technical inconsistency between the term 'green wedges' within the Central Lancashire Core Strategy and 'green corridors' used within the Plan. The meaning and intention behind the two terms is the same and a minor amendment has been proposed within Matter 1 to try and overcome this technical inconsistency.</p>						
<p>3.6. Further, Matter 3: Housing discusses the availability of land for housing and was informed by calculations on the density of sites and the number of allocation sites required to meet South Ribble's</p>						

	<p>housing requirement of 417 homes per annum. With this evidence referenced in Matter 3, the Council is satisfied that these above proposed allocations are appropriate and justified.</p>		
18	<p>Firstly I wish to say that my husband and I welcome the SPD on the definition of B2 land and how it is showing a clear need for the use of the land to be used for an identified local need (with the local need being stated as “local village/settlement need). We also appreciate the opportunity to comment on the proposed SPD.</p> <p>We are concerned that in paragraph 5.1 that market housing has been added as a use for this land. Market housing does not come within the current B2 Policy. Surely market housing is only justified if it facilitates the provision of affordable housing and that the affordable housing has been clearly and independently identified a local village/settlement need. It does not merit to be listed as an acceptable use in its own right. The proportion of affordable housing should also be clearly stated. In paragraph 7.1 there is a need for clarification on if the local settlement need is for a community use, such as a community centre, then the proportion of housing development should be in proportion with the need and size of the community facility. This would limit the development of large market housing being put on B2 land and just a small community use/facility being built just to justify the release of B2 land.</p> <p>Throughout the document there is an inconsistency in the terms used. In several places the word need is not defined as local need and therefore could be interpreted as covering a wider area than the local village/settlement need. There are also terms such as up-to-date that are not defined and therefore can be interpreted by the reader to suit their intentions. The document is being drawn up to avoid misinterpretation, leading to misuse, of the use of B2 land.</p> <p>I hope our views and comments will be taken in consideration and we look forward to seeing the final policy.</p>		<p>Policy B2 does not have any restriction on market housing, providing there is a demonstrated local need for what is being proposed. During the Inquiry Process for the Local Plan, the Planning Inspector removed the restriction in the then draft Policy B2 to prevent market housing being delivered on sites covered by this allocation. This can be seen in her letter to the Council dated 1 April 2014, where she clearly states that this restriction should be removed. She also stated in the Inspectors Report into the Plan that this modification to remove the restriction on Market Housing was in line with Government Guidance and ensures the plan is positively prepared. As there is no restriction in the Policy on market housing, it is considered to be appropriate for the SPD to include guidance for such applications. The Policy does not say that market housing will only be permitted to facilitate affordable housing, and therefore the SPD cannot say this.</p> <p>Any inconsistency of terms has been amended where necessary in the document, and terms have also been defined, where necessary.</p>

Next Steps

The Responses Report, and the revised draft SPD, will be published online for a 4 week period, from 21 August 2019 until 18 September 2019.

Comments on the report, as well as the revised draft SPD, can be sent to [planningpolicy@southribble.gov.uk](mailto:planningpolicy@southribble.gov.uk), or via post to: Planning Policy Team, Civic Centre, West Paddock, Leyland, PR25 1DH.