

Total 24 responses received

1. Central Lancashire Employment Skills Supplementary Planning Document – 30 January – 13 March 2017 consultation

19 responses received and Councils Response is shown below:

Note: South Ribble Borough Council consulted on a Green Belt Infill SPD using the same consultation period and some joint responses were received as referenced at 2, 4 and 8.

Reference	Comments	Councils Response
10	<p>On behalf of the Construction Industry Training Board (CITB) I am submitting feedback on the proposals to introduce a Central Lancashire Employment and Skills Supplementary Planning Document.</p> <p>CITB is the Industry Training Board for the construction industry and represents around 75,000 construction businesses across Great Britain. CITB's role is to ensure that the construction industry has the right skilled people in the right place at the right time to fulfil the pipeline of projects the economy has. It does this by working with a range of stakeholders, looking at training provision, policy and funding, creating an environment where these core principles work together to get the best outcome.</p> <p>The introduction of an Employment and Skills SPD for Central Lancashire is something that CITB welcomes. Having guidance to help contractors and developers to understand their role in achieving social value outcomes on construction projects is critical to these requests being successful. By using the CITB's National Skills Academy for Construction (NSAFC) Client Based Approach (CBA) as a methodology the Central Lancashire guidance follows circa 50 other local authorities across Great Britain in using an industry developed, industry approved model. It allows contractors and developers to deliver a consistent set of social value key performance indicators that they recognise from their work elsewhere in the country, which means they don't have to set up a new system of identifying and collating information about social value outcomes for each project that they deliver, thereby removing duplication, confusion and cost. CITB can support the contractor and developer in delivering the NSAFC CBA key performance indicators through its team of advisors and its grant system, which can financially incentivise in-scope registered companies to</p>	Support Noted.

Reference	Comments	Councils Response
	<p>deliver the key performance indicators.</p> <p>In summary, CITB is very supportive on this introduction of this SPD.</p>	
11	<p>Thank you for consulting us on the above Supplementary Planning Document. We have reviewed the draft document in relation to our remit and we have no comments to make.</p>	Comments Noted.
12	<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> <p>Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.</p> <p>If you have any queries about any of this matter or would like to discuss anything further, please do not hesitate to contact me.</p>	
13	<p>I've recently seen the SPD that's out for consultation. I just wanted to say that it's about time that local authorities used their powers to create local employment, jobs and training.</p> <p>The Social Value Act places a requirement on local authorities to consider wider community benefits and I've seen little evidence of this happening.</p> <p>I work with young people to support them into training and employment and am really pleased that South Ribble Council are hoping to make the requirement for an employment and skills plan a condition of the planning process. The impact that this could have on local jobs and training should be significant</p> <p>Well done! I hope it gets approved</p>	Support noted.
14	<p>Dear Sir/Madam, Draft Central Lancashire Employment Skills SPD On behalf of Miller Homes Ltd, Planning Potential have reviewed the content of the above SPD; released for consultation until the 13th of March 2017.</p>	<p>- It is not clear how the thresholds have been arrived at.</p> <p>The thresholds have been arrived at having regard to consideration of other such SPD's that</p>

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	<p>Miller Homes Ltd are an award winning national housebuilder, with aspirations to deliver essential housing for the Boroughs of South Ribble, Preston and Chorley. The housebuilder supports the joint Council's aspirations for economic growth across Central Lancashire, with Paragraph 3.3 of the Draft Central Lancashire Employment Skills SPD noting forecasts which suggest that 20,000 new jobs will be created, alongside 17,420 new homes.</p> <p>To secure sustainable growth, the NPPF encourages a proactive and responsive planning framework, through the preparation of an up-to-date Local Plan. Supplementary Planning Documents are defined as documents, which add further detail to the policies in the Local Plan and provide further guidance for development on specific sites, or on particular issues, such as design. On this point, Paragraph 153 of Framework states that SPDs should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.</p> <p>The aim of the publication of the Draft Central Lancashire Employment Skills SPD is to facilitate economic growth, by helping businesses already located in Central Lancashire to grow and attract new businesses into the area. To enable this, the SPD introduces the requirement for the submission of Employment Skills Statement for certain types of planning applications. A list of processes that will need to be followed are outlined at Section 14 of the SPD, alongside information on what the Plan will need to cover.</p> <p>Planning Potential on behalf of Miller Homes have reviewed the Draft Central Lancashire Employment Skills SPD in detail. The introduction of the SPD is welcomed. However, concern has been raised on the level of detail required to enable validation, alongside monitoring arrangements and the need for flexibility.</p> <p>1. Content of SPD It is noted that an 'Economic Skills Statement' is required for housing developments that exceed a 30 unit threshold. Planning Potential question how this threshold has been calculated, and request information on this point.</p> <p>It is noted that the threshold promoted, does not apply to applications submitted in outline form. This position is supported as matters relating to design (scale; layout; landscaping; appearance; means of access) are subject to change, through the consideration of a reserved matters application. The submission of this level of detail would be premature.</p>	<p>have been implemented around the country. Also based on knowledge within the Councils of the likely scale of activity associated with development of the scale prescribed. It is considered if the thresholds are set higher than those suggested then it could be the case that so few developments covered by the requirement as to render the exercise of little value. The thresholds will be kept under review to see if they are indeed appropriate.</p> <ul style="list-style-type: none"> - The detail required is unresponsive to market and economic conditions which could change at the time of implementation via the discharge of conditions. A report outlining the scope of works and level of detail which can be secured is considered more appropriate and robust approach to ensure deliverability. - We believe as the plans will be bespoke to the particular development they will be entirely responsive to market and economic conditions. The plan will be a 'live' document that can evolve as and when is necessary. The desire is for this to be a positive, helpful tool to assist the developer. - The LDS highlights the need for a partial review of the Core Strategy <p>Various studies are currently underway which will form the evidence base to review both the Core Strategy and the respective authorities'</p>

Reference	Comments	Councils Response
	<p>From our review of Section 14 and Appendix 1 of the SPD; we again consider that the level of detail required to enable the validation of a reserved matters or full planning application would be premature, and could impact on the deliverability of essential housing.</p> <p>In support of the above, it is widely accepted that proposals submitted in detail form will also evolve through the application process; in response to ongoing discussions with statutory consultees and residents. Changes made to schemes can sometimes be extensive, with wider planning implications. On this point, it is noted that the timeframe from validation through to implementation can be up to five years; with a requirement for conditions to be discharged, to enable works to commence on site, through to occupation. During this time, employment numbers and market conditions could change. This position is also widely acknowledged. Consequently, the deliverability of a scheme can be threatened by a requirement which is not achievable.</p> <p>From our experience the level of information required by the current Draft SPD1 is normally secured via condition. This process allows a degree of flexibility to enable a development proposal to respond to the market and economic conditions, at the time of implementation. Indeed, securing detailed information on the type of jobs; phasing and timescales; details on future workforce; skilled and productive workforce; and community benefits by condition (in our view), meets the requirements of Paragraph 206 of the NPPF2 and should therefore be encouraged. However, Miller Homes do support the aspirations of the joint Councils and therefore recommend that a statement is required which only seeks to outline what information will be covered, rather than specific details which could change.</p> <p>2. Monitoring</p> <p>Section 16 states that more generally the Councils will monitor the effectiveness of this guidance, including Core Strategy key indicators and review as appropriate in the light of its performance and future changes in planning law and policy guidance.</p> <p>Planning Potential draw reference to the most recent Local Development Scheme, dated April 2015 to April 2018. The document highlights the need for a Partial Review of the Central Lancashire Core Strategy (2012) based on appropriate evidence, following the adoption of the 2015 Local Plan. This is even more pressing, following the revocation of the RSS. We have been made aware that a new SHMA is expected to be released in March 2017. On this point, it might be</p>	<p>local plans. So effectively the process of review has commenced</p>

Reference	Comments	Councils Response
	<p>premature to adopt the SPD until a partial review has been undertaken by the Council to ensure evidence is robust and based on an up-to date evidence base.</p> <p>Summary</p> <p>In summary, it is our view that:</p> <ul style="list-style-type: none"> • It is not clear how the thresholds have been arrived at. We would welcome clarity on this. • The preparation of an Economic Skills Statement is welcomed. However, it is our view that the level of detail required in the SPD is unresponsive to market and economic conditions which could change at the time of implementation via the discharge of conditions. A report outlining the scope of works and level of detailed which can be secured via condition is considered more appropriate and robust approach to ensure deliverability. • The LDS highlights the need for a partial review of the Core Strategy. Indicators as outlined are at risk of being found to be considered out-of-date. <p>If the Council requires any further clarification on the above matters, please do not hesitate to contact me directly.</p>	
2	<p>Thank you for inviting Highways England to comment on the new SPD's relating to for Green Belt Infill and Central Lancashire Employment & Skills.</p> <p>Highways England has no comments om either document.</p> <p>If you would like to discuss this email, please contact me.</p>	Comments Noted.
22	<p>Thank you for your consultation on the above dated 30 January 2017, which was received by Natural England on 30 January 2017.</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> <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>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.</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>	Comments Noted.

Reference	Comments	Councils Response
	<p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. 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> <p>Please send all planning consultations electronically to the consultation hub at consultations@naturalengland.org.uk.</p>	
23	<p>Steven Abbott Associates LLP is an independent town planning consultancy which acts for a broad portfolio of clients across the north west and nationwide. A considerable number of our clients have interests in Central Lancashire and we therefore welcome the opportunity to comment on this draft SPD.</p> <p>Our comments are as follows:</p> <p>Paragraph 2.1 - The definition of social value adopted in the SPD includes the words “above and beyond the value of that good or service.” Any planning obligation which seeks to secure anything which is “above and beyond” the value of the planning permission granted cannot meet the tests set out in paragraph 204 of the National Planning Policy Framework. Such an obligation or a condition would also be questionable in terms of paragraph 206 of the NPPF as it is by no means clear that they would be necessarily, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.</p> <p>Paragraph 8.1 - The paragraphs in the NPPF which are quoted are concerned with securing sustainable economic development through the land use planning system. It is not clear how the production of an employment skills statement within the context of a planning application will add anything positive to that process. Indeed, paragraph 21 of the NPPF warns against businesses being “overburdened by the combined requirements of planning policy expectations.” Furthermore, paragraph 154 of the NPPF states “Local plans should address the spatial implications of economic, social and environmental change.” (my emphasis).</p> <p>Paragraph 153 states “Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to</p>	<p>Paragraph 2.1</p> <p>We believe the added value already exists in the development process and this is way of regulating /formalising it to the benefit of everyone.</p> <p>For example a large housing development will need a skilled labour force and will take on apprentices. This SPD seeks to ensure this work force has the correct skills and training, and the right labour force in the right place at the right time. The skills statement will be entirely precise and directly related to the development being permitted.</p> <p>Paragraph 8.1</p> <p>The paragraphs that are quoted from the NPPF demonstrate that economic development and growth are inextricably linked to the whole development process. We believe an Employment Skills plan will be an entirely positive addition to the land use planning system. For example one of the major reasons that housebuilders have told us that they are not building out at the rate expected based on historical patterns is the lack of a skilled labour force. We don’t see this as an additional burden on the development process indeed it seeks to positively assist it.</p>

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	<p>add unnecessarily to the financial burdens on development.”</p> <p>Paragraph 12.2 and sections 13 and 14 - The need for the Councils to be flexible and to take a pragmatic approach is recognised and welcomed. However, in a planning system which is already over-stretched and under resourced, it is difficult to see how a typical development management planning officer will have either the necessary time or the knowledge to discuss and evaluate an employment skills statement. Without the necessary time, knowledge and commitment, the process is likely to be reduced to a tick box exercise which would be of little benefit to anybody.</p> <p>Paragraph 15.2 - Who will monitor these outputs? What actions would be taken if any element of the requirement is not met? The practical and manpower implications of these requirements do not appear to have been properly considered.</p> <p>Also the SPD does not reflect the Local Plan/Core Strategy policy it purports to be based on. Policy 15 indicates that the LPA’s will (a) identify skills shortages; (b) work with providers to develop courses and life-long learning, and improve access to courses; and (c) encourage knowledge based businesses and the creative industries. It refers to working closely with colleges, training establishments and major local employers. There appears to be nothing in the policy that suggests or requires developers to contribute directly to training provision etc, and as such the SPD goes well beyond consideration of the spatial implications of the Core Strategy.</p> <p>In summary, the need for employment skills statements as part of the planning application process has not, we believe, been demonstrated and as set out in the draft SPD, the process could delay and stifle economic growth rather than promote it.</p> <p>The document appears to go well beyond spatial implications and introduces a layer of complexity and policy requirements with potentially significant financial implications. Has any assessment been undertaken of the potential additional costs the process and any outputs/requirements could have on development and delivery?</p> <p>We are aware that employment skills statements have been introduced elsewhere in the UK, but are not aware if they have been monitored and their effectiveness demonstrated.</p> <p>In the absence of a more compelling case being made for employment skills statements as part of the planning application process, we believe that they should not be introduced in Central Lancashire.</p>	<p>Paragraph 12.2</p> <p>This SPD and the tasks associated with it has not been entered into with considerable discussion across the three councils. Economic Development, Policy and Development Management Teams will all have an input and well as additional resources that are available generated from City Deal. There is additionally always an option to seek outside consultancy help where the case requires it.</p> <p>Paragraph 15.2</p> <p>The monitoring will take place in the same way as any other planning obligation. There would be no desire to penalise any developer who didn’t meet an obligation it would be more a case of intervening to seek to offer assistance. This is all about trying to make a cede change in the behaviours and attitudes of developers.</p> <p>Policy Background</p> <p>Core Strategy Policy 15 is the ‘policy hook’ for the development of the SPD. This policy sets out the intent to work with existing and incoming employers to identify skills shortages and then liaising with colleges and major local employers, to develop courses, lifelong learning and increase access to training (my emphasis.) The SPD by requiring the submission of the Skills Plan, encourages and assists the delivery of the above aspirations. Fundamentally it requires the major local employer, whether it be the housebuilder or the industrialist to identify the skill shortage associated with their development and put actions in place to address this shortage by developing courses, learning and access to training. Therefore the SPD</p>

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		<p>does accord with provisions of Policy 15.</p> <p>Cost</p> <p>It is not considered that this will introduce a significant additional financial cost for developers. Fundamentally this SPD will help to provide clarity and a structure to actions that are already taking place or should to be taking place. It is the case of course that if in any particular case if the viability of a development is threatened then the developer is entitled to present viability evidence as to why they are unable to meet any obligation resulting from the SPD.</p> <p>Justification</p> <p>Central Lancashire supported by City Deal and two Enterprise Zones is about to enter a period of unprecedented growth this allayed with the Governments growth agenda provides the justification for quality higher education; training and skills to ensure a skilled local labour pool is available for new and expanding enterprises. It should certainly not stifle economic growth as the SPD is trying to assist in providing one of the ingredients to allow growth to happen i.e. a skilled labour force that is available in the right place at the right time.</p>
24	<p>Regarding this draft SPD, I hope this letter provides you with details of what we currently offer as a business and active developer within Central Lancashire.</p> <p>1. Creation of apprenticeships:</p> <ul style="list-style-type: none"> • Barratt Group has employed 995 apprentices in the last 10 years • Barratt Manchester has vacancies for eight trade apprentices this year (2017) • Barratt Developments Plc was named 2014 BT Macro Employer of the Year by the National 	<p>Support Noted. The Council has noted all of the actions Barratt Homes currently undertake.</p>

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	<p>Apprenticeship Service.</p> <ul style="list-style-type: none"> • In 2017 the company was shortlisted for the Best School Leaver Programme for the Target Jobs Awards <p>2. Recruitment through Job Hub and Jobcentre plus and other local employment vehicles:</p> <ul style="list-style-type: none"> • Thorough our own website • Transition partnership to support ex forces personnel <p>3. Work trials and interview guarantees:</p> <ul style="list-style-type: none"> • Some divisions offer work trials and interviews through specific relationships with local authorities e.g. at Hollygate Park in Cotgrave, Nottingham – North Midlands division <p>4. Vocational training (NVQ):</p> <ul style="list-style-type: none"> • Apprentices work towards a two year intermediate apprenticeship with the opportunity to progress to an advanced apprenticeship then once completed they have the option to progress to an assistant site manager programme through the Barratt Academy or through our sponsored degree program. • An NVQ forms part of an apprenticeship • We also qualify many employees to their NVQ at supervisory and management levels. <p>5. Work experience (14-16 years, 16-19 years and 19+ years):</p> <ul style="list-style-type: none"> • All divisions support this where possible in our Technical and Commercial departments for those interested in a Quantity Surveying, Buying, Technical Engineering and Design. <p>6. Links with schools, colleges and university:</p> <ul style="list-style-type: none"> • All divisions arrange regular site and health and safety tours with local schools etc. • There is also a specific Working Safely with Schools pack available to divisions and a Safety Bill mascot that can be used for these events. • We also have on campus ambassadors, sponsor the West Midlands Construction UTC and 	

Reference	Comments	Councils Response
	<p>attend/carry out careers events and talks.</p> <p>7. Supervisor training:</p> <ul style="list-style-type: none"> • All apprentices work with experienced tradespeople on site and have an apprentice champion who manages their progress. • For technical and commercial they are provided with a mentor. • We have the Barratt Assistant Site Manager Academy. <p>8. Management and leadership training:</p> <ul style="list-style-type: none"> • Foundation and BSc (Hons) Construction degree from Sheffield Hallam University • A full range of in house management training delivered by the Talent Team <p>http://www.barratfuturetalent.co.uk/sponsored-construction-degree/</p> <p>9. In house training schemes:</p> <ul style="list-style-type: none"> • Accelerated construction scheme - one year • ASPIRE Graduate training scheme – two years • A full range of sales, customer service, IT and management training is delivered by the Talent Team. <p>http://www.barratfuturetalent.co.uk/graduates/programmes/</p> <p>10. Construction Skills Certification Scheme (CSCS) cards:</p> <ul style="list-style-type: none"> • This is part of their qualification for Technical and Commercial and all trade apprentices must sit the health and safety test to acquire one • We mandate CSCS Scheme cards for all site staff. 	
3	<p>I am also Clerk to Heskin Parish Council and they discussed this on 2nd February. The Council had no comments to make.</p> <p>However the Parish Council did ask me to obtain details of the impending arrival of an IKEA store in South Ribble. Can you give me details please</p>	<p>Comments Noted. Request for information passed to Development Management Team.</p>

Reference	Comments	Councils Response
4	<p>Dear South Ribble Planning Policy Team</p> <p>I refer to your consultation on the draft Green Belt Infill SPD and the draft Central Lancashire Employment Skills SPD.</p> <p>The latter would appear to have no major direct significance for nature conservation so we have no comment.</p>	Comments Noted.
5	<p>What a ridiculous waste of time!</p> <p>I thought we were meant to be removing unnecessary bureaucracy. Statement just seems to be an excuse to employ additional policy officers who generate nonsense paperwork to justify their own existence.</p> <p>*****email sent to Mr Welbank asking for further comments*****</p> <p>Good Afternoon Mr Welbank,</p> <p>My colleagues and I were extremely disappointed with the contents of your consultation response below, particularly given it's from a fellow professional operating a business in the area.</p> <p>In accordance with the relevant regulations, at the end of the consultation process we are required to publish a report including all responses and the authority's response to the points raised. In view of this we wondered whether on reflection you wished to review your response?</p> <p>The entirely laudable aims of the SPD to ensure the right education, skills and training are in place to support the continued economic growth of the region, were given even greater legitimacy in the Government White Paper 'Fixing our Broken Housing Market', final paragraph of page 16, which was published this week. It states with respect to businesses:</p> <p>"Critically, we also expect them to take responsibility for investing in their research and skills base to create more sustainable career paths and genuinely bring forward thousands of new skilled roles"</p> <p>I look forward to hearing your response to the above.</p> <p>*****reply to clarification email*****</p> <p>Mr Brown (South Ribble Borough Council)</p> <p>Further to your email I find it quite amusing that your department only seems to require positive</p>	<p>This response fails to appreciate or acknowledge the extensive work that is carried out and the knowledge that the Economic/Policy Teams possess across the three authorities within this topic area. This SPD seeks to build upon the existing work. We believe that land use planning and the aspirations of the SPD are inextricably linked in this respect. It is noted that the Construction Industry Training Board strongly support the SPD.</p>

Reference	Comments	Councils Response
	<p>feedback on consultations and not negative ones. Is it policy to contact all negative responses and ask that they be withdrawn?</p> <p>Does the planning policy team really believe that they know more about skills development than actual real businesses?</p> <p>All you are actually doing is getting businesses to produce another long winded, costly tick box report that satisfies a planning regime that is completely out of touch with its primary role of land use planning.</p> <p>Rather than encouraging economic activity the plethora of nonsensical, often out of date planning documents that are being produced are simply slowing up, and in some cases discouraging businesses from locating in the area.</p> <p>Please keep my original response on the consultation, including your request to withdraw and this response.</p>	
6	<p>Adlington Town Council considers that the proposal to introduce a Skills Statement into the planning process is a step in the right direction, and hopes that the provision of these will carry weight in the decision making process.</p>	<p>Support Noted.</p>
8	<p>I refer to the consultation on the draft Green Belt Infill SPD and also the draft Central Lancashire Employment Skills SPD. Farington Parish Council gave consideration to both these draft documents at their meeting held on 13 February 2017 and agreed that they support both these SPDs and welcome the clarification with regard to procedure.</p>	<p>Support Noted.</p>
26	<p>I am writing to provide comments on behalf of Orbit Investments (Properties) Ltd regarding the above.</p> <p>Orbit, part of the Emerson Group, one of the largest privately owned property development and investment companies in the UK, own a development site at Buckshaw Village, adjacent to Buckshaw Parkway railway station.</p> <p>Having considered the Draft Central Lancashire Employment Skills SPD, Orbit request that the following comments are taken into account when finalising the SPD.</p> <p>13. When a statement be required (p.7) Orbit object to the requirement to submit and Employment Skills Statement on commercial applications exceeding 1000sqm. Orbit consider this threshold to be too low and believe that it will unnecessarily increase the burden upon small and medium scale development, which is not in accordance with NPPF Para 153, which states: "Supplementary Planning Documents should be used where they can help applicants make</p>	<p>The plan will be bespoke for the scale of development proposed and the content can be discussed through the pre-application process. Therefore this would accord with Orbit's suggestion that the information presented is proportionate and on a sliding scale. We don't see this as a financial burden it is more a case of rationalising existing behaviours</p> <p>The driving force behind this SPD is about creating a cede change of behaviour and if the floorspace threshold is set at the level suggested i.e. 10,000 Sqm it will apply to a very limited number of developments to such an extent it would totally undermine the purpose of introducing the SPD. For example, a number of years may pass between applications</p>

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	<p>successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development".</p> <p>Orbit therefore recommend that a threshold of 10,00sqm would be more appropriate.</p> <p>14. What Will the Statement Cover? Orbit object to the lack of proportionate interpretation of the proposed SPD requirements, which as worded, appears to apply equally to all applications submitted above the threshold. This is contrary to NPPF para 193, which states</p> <p>"Local Planning Authorities should publish a list of their information requirements for applications, which should be proportionate to the nature and scale of development proposals and reviewed on a frequent basis. Local Planning Authorities should only request supporting information that is relevant, necessary and material to the application in question.</p> <p>Orbit therefore request that the information requirements be applied proportionately on a sliding scale, with only the very largest development providing the full range of information.</p>	<p>of this scale in each of the three Boroughs.</p> <p>NPPF Paragraph 193 – this should not be seen as a burden on the development, its intention is to assist delivery by seeking to ensure or least help delivery by promoting training and skills. The requirement will form part of the validation checklist.</p>
27	<p>Grimsargh Parish Council considered the above consultation document at their recent Parish Council meeting and agreed to comment that they support this SPD and the clarification of policy in relation to planning applications and employment skills statements.</p>	<p>Comments noted.</p>
28	<p>In response to the Employment Skills SPD consultation, Whittingham and Woodplumpton Parish Councils made similar comments as detailed below.</p> <p>Members RESOLVED to support the principle of the Skills Statement as it encourages developers to consider the creation of apprenticeships, links with schools and colleges, use of local suppliers and help with community based projects – however, Members questioned whether the developer is obliged to actually provide any of the items listed in the Skill Statement and given the limited resources available to the City Council, will officers be in a position to monitor compliance and if the developer doesn't comply once development commences, what action, if any, will be taken?</p> <p>If the SPD is adopted, Members request that the Skills Statements are included on the City Council website so that local input can be provided when responding to the application consultation.</p> <p>Members also request a written reply to the points in bold above so that the Parish Council can be certain that it is a worthwhile exercise submitting comments on the Skills Statements.</p>	<p>Comments Noted.</p> <p>Resources will be made available to monitor the submitted statements. This SPD seeks to encourage a cede change of behaviour and we would be looking to ‘encourage’ compliance rather than taking ‘enforcement action’ as such.</p> <p>The SPD will be displayed on websites and the requirement for a ‘statement’ will be set out in the validation checklists of the three councils</p>

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29	Thank you for your consultation on the Central Lancashire Employment Skills SPD, having reviewed the document the Canal and River Trust have no comments to make.	Comments Noted.
30	Thank you for consulting us on the above Supplementary Planning Document. We have reviewed the draft document in relation to our remit and we have no comments to make.	Comments Noted.

2. Schedule of Responses to Publication of Responses Report - Wednesday 28 June to Wednesday 26 July 2017 consultation

Central Lancashire Employment Skills Supplementary Planning Document

A further 4 Responses received and Councils Response is shown below:

Response Number	Response	Councils Response
1	<p>The subject of this draft Supplementary Planning Document for the Central Lancashire planning authorities lies out with my core remit and expertise, and I offered no comment on the original consultation for that reason.</p> <p>However, I'm copying in colleagues who are more specifically engaged in our role as charitable sector employers as this <i>may</i> be of interest to them.</p>	Comments Noted
2	<p>Great, thank you. I've attached some information about the Shared Apprenticeship Service that we run on behalf of CITB across the North West. If any contractors are concerned about how they can support local apprenticeships, especially on short term work packages, this might help them. Good luck with the consultation. If you need anything from me, please let me know.</p>	Comments Noted
3	<p>Historic England do not have any additional comments to make on the responses report.</p>	Comments Noted
4	<p>We have previously submitted comments (to assist) regarding this SPD so do not propose submitting further: please rely upon our previous submission.</p>	Comments Noted