

Date: 5 December 2012

Your ref: PINS/F2360/429/2

Our ref: JB

Please ask for: Jeni Barnes

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Dear Ms Heywood,

We acknowledge receipt of your letter dated 22 November 2012 with a series of questions and queries in relation to the South Ribble Site Allocations and Development Management Policies DPD, from this point on referred to as 'the Plan'. Please find the authority's response as set out below, including a series of statements and reports as appendices to this response. We have responded in chronological order to your questions and queries.

Has the Plan been prepared in accordance with the statutory procedures of the 2004 Act (as amended) and the associated regulations, including in respect of the publication and availability of documents, advertisements and notification?

Yes, the Plan has been prepared in accordance with the statutory procedures of the 2004 Town and Country Planning Act. Attached as an appendix to this response is a modified Regulations 22 (1) (c) Report, which includes details of availability of documents, advertisements and notification at all stages of the Plan's preparation. See Appendix One for full details.

Has the Authority complied with Regulation 22 (c) (i), (ii), (iii) and (iv)?

Yes, the Authority has complied with Regulation 22 (1) (c) (i) (ii) (iii) and (iv). A detailed response to Regulation 22 (1) (c) (i) and (ii) was omitted from the Regulations 22 (1) (c) report submitted to the Planning Inspectorate on 29 October 2012, referenced SRSD003. Attached (Appendix One) is an addendum to the Regulation 22 (1) (c) report which includes our full procedural response to (i) and (ii).

Has the Authority satisfied the 'duty to cooperate' as indicated by S33A of the 2004 Act?

Yes, the Authority is satisfied that it has fulfilled the legal requirement of the 'duty to cooperate' as indicated by S33A of the 2004 Act, which requires local authorities to cooperate in relation to the planning of sustainable development, in this case through the preparation of local plans. The Authority has prepared a Statement of Compliance referenced SRE001 (submitted on the 29 October 2012 to the Planning Inspectorate) detailing how the Authority has complied with the 'duty to cooperate' in relation to strategic matters. Much of this initial document relates to work prepared at the Central Lancashire Core Strategy level as this 'parent DPD' explored and examined the strategic matters for Central Lancashire, including South Ribble. The joint working and cooperation instigated through the

joint working on the Core Strategy has continued with the preparation of the Plan, evidence of this can be seen through the supplementary topic paper provided at your request, attached as Appendix Two, to this response.

Please note as an additional aid we will update the Statement of Compliance SRE001 to include the correct referencing relating to the South Ribble library of submission and evidence documents. This will be provided shortly.

Has the Plan taken account of the plans of adjoining local authorities and the County Authority?

Yes, the Authority has considered the relationship between the Plan, the wider LDF, adjoining local authorities and the County Council. As in many of these responses the Core Strategy, as the first adopted DPD in our LDF, instigated the process of joint working, cooperation and the need to take account of the wider Lancashire environment.

Chapter two of the Core Strategy details the relationship with national, regional, sub-regional and local level plans and evidence, which has influenced the preparation of the Plan. Specifically, the authorities looked at regional plans and strategies including the RSS, the Northern Way, regional economic and housing strategies, then looked at Lancashire-wide strategies including green infrastructure, economic, housing and transport to see how these wider issues would affect the Central Lancashire LDF and strategic issues to consider within the preparation of the Core Strategy. Joint working groups were set up around some of the specific topics and issues including officers from the county council and adjoining authorities and their concerns and issues were taken on board at a Lancashire-wide level, which has fed into our LDF preparation.

At a local level there were studies on Mid Lancashire/Central Lancashire priorities; housing, employment, climate change and joint working groups were set up to discuss these issues and take account of them through LDF preparation.

The Authority has a close working relationship with Lancashire County Council (LCC), members and officers on strategic issues for example, the Joint Advisory Committee (JAC) set up with member and officer representatives from LCC and Chorley, Preston and South Ribble authorities, also a transport working group attended by LCC and Lancashire authorities. The County has been involved and cooperated on all stages of the South Ribble LDF process, including preparation of the Plan. In addition, ongoing meetings/correspondence have occurred. There have been ongoing Development Plans Officer Group (DPOG) meetings where managers or senior officers from the Lancashire authorities and LCC meet to discuss their development plan process and examine any key issues that are cross-boundary. South Ribble has been a key member of this group.

In respect of our adjoining authorities, we have a good working relationship with all authorities. West Lancashire are currently preparing their Local Plan, encompassing their Core Strategy and Site Allocations and Development Management Policies DPD in one document, we have each been involved in commenting on our LDFs and suggesting improvements where applicable. Ribble Valley Borough Council has been involved in joint working with us on the Enterprise Zone (EZ) in Samlesbury, where the site covers both South Ribble and Ribble Valley. Blackburn with Darwen Council have also been involved in joint working and have commented on all stages of our LDF, we have had ongoing meetings/correspondence taking account of their plan preparation and taking on board any comments they have regarding ours.

Whilst much of this joint working began at the Core Strategy level for South Ribble, it has continued at the Site Allocations stage and influenced the direction and outcome of the Plan.

The Statement of Compliance topic paper attached in Appendix Two provides further evidence to support our joint working in terms of adjoining authorities and the county authority through illustrating the process of cooperation and outcome.

Has the Plan been prepared in accordance with the Authority's Local Development Scheme (LDS)?

The Plan was prepared in the majority alongside the Central Lancashire Local Development Scheme (LDS) March 2011 which set out the key timescales for its production and was publically available on the Council's website. The Issues and Options stage of preparation and consultation was carried out as anticipated through the previous LDS. The Preferred Options document was scheduled for preparation between February and August 2011, due to a higher than expected number of representations received at the Issues and Options stage, this timeline was extended and preparation was completed by October 2011 and an ensuing consultation phase began in November until December 2011.

The Publication stage of preparation was scheduled between November 2011 and February 2012, and representations sought between March and April 2012. Unfortunately, the timescales slipped slightly due to uncertainty caused through the delay of the Central Lancashire Core Strategy and awaiting the outcome on strategic priorities; the Publication document was finalised by June 2012 and sought representations between July and August 2012. A new LDS was published on the Authority's website in October 2012 which set out revised timescales for the production of the Plan taking into account the slippages that had occurred over the previous 12 months.

The Authority is in compliance with the timescales set out in the current LDS October 2012 to date. See Appendix Three – Central Lancashire Local Development Scheme March 2011 which was omitted from the evidence base due to a revised LDS published in October 2012, which was included within the evidence base, referenced as SRE035.

Has the Plan been prepared in accordance with the Authority's Statement of Community Involvement (SCI) and met the minimum requirements of the relevant regulations in terms of consultation and publicity?

Yes, the Plan has been fully prepared in accordance with South Ribble's adopted SCI at all stages of its preparation. The Regulations (2012) have imposed new criteria for authorities in preparing local plans including a 'duty to cooperate' which has a list of prescribed bodies to engage with that are different from those bodies contained in the previous regulations, to which the SCI relates. Since we published our SCI in 2006 some bodies with whom we have consulted at all stages of the process have changed, for example the Countryside Agency and English Nature have combined to become Natural England. Additional engagement and cooperation has emerged over and above that set out in the SCI to take account of the new regulations. Please see our SCI, included within the evidence library and referenced SRSD004. Also, please see amended Regulation 22 (1) (c) report which includes a full 'Statement of Consultation' in compliance with our SCI.

Is the Council satisfied that the sustainability appraisal report accompanying the draft plan adequately summarises or repeats the reasons that were given for rejecting the alternatives at the time when they were ruled out (and that those reasons are still valid)? The Authority may wish to refer to the judgement in *Save Historic Newmarket Ltd v. Forest Heath District Council [2011] EWHC 606*.

The Council is satisfied that the Plan accurately and adequately includes sites and policies that have been subject to a full and thorough sustainability appraisal and the reasons for sites inclusion and rejection are still valid. The Authority has referred to the judgement in *Save Historic Newmarket Ltd v. Forest Heath District Council [2011] EWHC 606*, with particular note to a 'failure to comply with the relevant EU Directive and the Regulations made to implement it in that the strategic environmental assessment (SEA) did not contain all that it should have contained'. However, on close inspection of the sustainability appraisal report accompanying the Plan the Authority considers they are legally compliant in this instance. Further reference to alternatives is made within the sustainability appraisal proformas which set out a methodology to assess the most sustainable sites and bring those sites forward within the Plan. Sites that were not considered appropriate (Appendix Four of the preferred

options sustainability appraisal report), in part resulting from the sustainability appraisal assessment have been ruled out.

Text within the main body of the report on pages 24 to 28 gives further details of the rejected sites and reasons for these options not being taken forward. Likewise, Appendix Five of the preferred options sustainability appraisal report refers to the sustainability appraisal proformas for sites that are considered appropriate options to bring forward in terms of their sustainability assessment. Text within the main body on pages 29 to 48 provides evidence of why these options are supported through the sustainability appraisal. All preferred policies were subject to a full sustainability assessment including whether local plan policies were still relevant for inclusion or not, impacts of the Core Strategy policies, new policies that might be needed to cover policy gaps or particular issues identified through the Plan preparation stage. Information in the main text on pages 49 to 81 gives reasoning and information as to why these policy options were taken forward.

The section titled 'What has changed as a result of this SA' on page 82 aims to provide further clarity on the sustainability process and how it has shaped the Plan/is responsible for the inclusion or exclusion of sites and policies at this stage.

A number of changes occurred between the preferred options and the publication stages as a result of further work, representations received and responses to the duty to cooperate process which meant there was a need for additional sustainability appraisal assessment to ensure the Plan was up-to-date and valid. The amendment to the sustainability appraisal at the Publication stage includes assessment of these changes such as inclusion or deletion of new site options, changes to policies or the options for new policies to be included. This has been fully examined through the amendment to the sustainability appraisal report.

The Authority has been in contact with Natural England with regards to the sustainability appraisal and habitats regulations assessment, since the emergence of a joint working Core Strategy. In discussion with Natural England the methodology and approach was set and consultation and engagement between us has been ongoing. We have received a letter in response to the 'duty to cooperate' process stating that we have complied in full with this regulation. We have not received any representations at the publication stage highlighting any outstanding issues they may have with either of these supplementary documents. We are in the process of contacting Natural England on this point to receive a letter iterating this, to pass along to you prior to the examination.

What is the relationship between the Regional Spatial Strategy and the submitted Plan?

The South Ribble LDF, including the Central Lancashire Core Strategy (adopted) and the Plan have been produced in conformity with the Regional Spatial Strategy (RSS) as it remains part of the statutory development plan. The RSS has directed policy-making within Central Lancashire, particularly in terms of housing and employment requirements, strategic employment sites, key infrastructure, etc. The Core Strategy, as the strategic level of the LDF, has incorporated the aims, vision and direction of the RSS fully in its preparation. In turn this has influenced the direction of the Plan, especially the number of sites allocated for housing and employment in light of the requirements, strategic employment sites and key infrastructure set at the regional level. Neither the Core Strategy nor the Plan can be read in isolation of one another. Appendix Three includes two tables (Table One and Table Two) highlighting all the references to the RSS within the South Ribble LDF. The Authority recognises that the majority of references to RSS are contained within the Core Strategy although this is seen as appropriate given its strategic role. Table One includes references within the Core Strategy to strategic issues/matters for example, Growth Point, housing and employment requirements and methodology set at the regional level, Brownfield housing targets, potential revocation of the RSS and implications for this. Table Two has far fewer references and refers mainly to the potential revocation of RSS and housing requirement figures that have steered the level of sites allocated for housing.

Does the Plan contain, as relevant, a list of superseded and saved development plan policies?

Yes, the Plan contains a list of superseded and saved development plan policies illustrated in Appendix One of the Plan, as required by Regulation 8 (5) in the Local Regulations 2012. Also see Appendix C: Superseded Policies from Existing Local Plans, within the Central Lancashire Core Strategy, referenced SRE002.

Has the Plan taken account of the Authority's other plans, including any relevant Sustainable Community Strategies?

Yes, the Central Lancashire Core Strategy has included the vision and the main priorities incorporated within the Sustainable Community Strategies for South Ribble, Chorley, Preston and Lancashire County Council, within its vision, key aims and priorities. The sustainable community strategies for the four authorities informed the Strategic Objectives (shown on page 36 of the adopted Central Lancashire Core Strategy July 2012, referenced as SRE002), which thread through the document within all the topic specific chapters. These strategic objectives were created as a mechanism through which to include the vision and priorities of the sustainable community strategies and provide a framework for monitoring purposes to balance whether their vision and priorities were being delivered through the LDF process.

The Plan within South Ribble has followed this process by including the Strategic Objectives created within the Core Strategy at the beginning of each topic chapter titled 'Core Strategy Objectives'. There is a direct correlation between the Strategic Objectives derived from the sustainable community strategies and the key issues and policies taken forward in the Plan, for example Strategic Objective 2 in the Core Strategy (to ensure there is sufficient and appropriate infrastructure to meet future needs, funded where necessary by developer contributions), is taken forward in Chapter A of the Plan in a variety of measures, specifically Policies A1, A2 and A3 which seek to bring forward key infrastructure funded partly through developer contributions. Delivering infrastructure was a key aim of the sustainable community strategies of the four authorities.

Thus, there is an intrinsic link throughout the Plan to the sustainable community strategies of South Ribble and wider Central Lancashire, originating within the Central Lancashire Core Strategy and continuing within the Plan.

What is the programme, and is it being met, for the preparation of other development plan documents?

There are no other development plan documents being prepared for South Ribble. There is a series of Central Lancashire-wide SPDs which have been included within the evidence base referenced SRE003 – SRE007, for information. This package of SPDs was formally adopted by the three Councils at the end of October 2012. South Ribble is also in the process of preparing a further two SPDs, one on renewable energy and the low carbon economy and one on residential extensions. These are due for adoption in spring/summer 2013 and spring 2013 respectively. Preston and Chorley Councils are producing their Site Allocations and Development Management Policies DPD to sit alongside the Central Lancashire Core Strategy within their areas. The timetable for the production of these DPDs is included within the Central Lancashire LDS October 2012 (SRE035).

Is the Authority aware of any fundamental procedural shortcomings in the submitted document?

No. The Authority is confident that the Plan has been prepared fully in accordance with all regulations as set out, and is compliant both in terms of legal process and soundness.

I understand that some representations were received by the Authority after the due date of the consultation. Can the Authority confirm which representations it has accepted and that it is content for me to consider their content?

We received some representations to the Plan after the deadline of 15 August 2012. The Authority has compiled a list of these representations, included in the evidence base sent to the Inspectorate (SRSD002a/ SRSD002b) referred as 'late representations' in the tables in these aforementioned evidence base documents. We will be guided by you as to whether these late representations can be considered during the examination process; the Authority considers it acceptable to include the content of these representations if you are minded to.

The existence of a Habitat Regulations Assessment has been noted. At this moment in time, can the Authority confirm that there are no outstanding issues relating to this report raised by relevant bodies, for example Natural England?

The Authority has been in regular contact with Natural England in relation to the Plan and its subsequent Habitats Regulations Assessment and Sustainability Appraisal report. The Authority is confident there are no outstanding issues of concern for Natural England in respect of either of these reports. We are aiming to provide a letter of evidence to this effect, prepared by Natural England in due course.

As the Authority is aware and as mentioned above, S33A of the 2004 Act imposes a duty to cooperate between a local planning authority submitting a plan for examination and certain other bodies. I note the Statement of Compliance but this appears to relate to work undertaken at the Core Strategy stage. In addition, the evidence documents referred to in that Statement are not referenced using the referencing system for the submitted Plan. I would be grateful if the Authority could prepare a focussed topic paper/statement indicating how the duty has been discharged with regard to the submitted Plan. This should include two elements: firstly, how the processes of cooperation have been developed and utilised; secondly, what outcomes from the processes have been secured and whether they can be considered effective on all relevant issues, for example housing, nature conservation and necessary infrastructure.

As mentioned above in an earlier response, the Authority has produced a supplementary topic paper to discuss the processes of cooperation we have undergone and whether these have been effective on all of the key strategic issues. See attached topic paper referenced under Appendix Two of this response.

I invite the Authority to consider the suggested 'model policy' (<http://www.planningportal.gov.uk/planning/planninginspectorate/news>) devised with regard to the thrust of the National Planning Policy Framework. Does the Authority have any views as to how it may be reflected within the Plan?

The Authority is aware of the 'Model Policy' as referenced within the above text as it is included as an adopted policy within the Central Lancashire Core Strategy. The Authority had not considered incorporating this policy into the Plan due to a repetitive nature; however if the Inspector considers this to be the most appropriate course of action the Authority would not object.

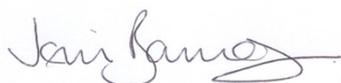
Other matters will no doubt require attention in due course. In particular I will wish to know how the Authority would wish me to proceed in the event that the Plan requires major modification, for example in relation to consistency between Green Belt Policy G1 and the National Planning Policy Framework.

The Authority would wish to deal with any minor amendments and challenges during the examination process as appropriate. If the Inspector were to consider any elements of the Plan to require major modification then we would be guided by your advice and comply with the Regulations as appropriate.

We have responded to your letter ahead of the designated timeframe you set as we are keen to proceed with the examination process in the timeliest manner possible. As you can understand, with the impending deadline for local authorities to have adopted local plans in place within the 12 month window set by the Government in respect of the NPPF, we are cautious to reach our timescales to prevent potential future vulnerability.

If we can provide any further information to ensure the process is followed as fully and quickly as possible please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jeni Barnes', with a stylized flourish at the end.

Jeni Barnes
Forward Planning
South Ribble Borough Council

Appendix One – ‘Statement of Consultation’ – this will form as an addendum to the Regulation 22 (1) (c) Report, referenced SRSD003

Addendum to Regulation 22 (1) (c) Report (SRSD003) specifically clause (i) and (ii)

In preparation of the Plan the Authority invited the following bodies/persons to make representations at each stage of the Plan’s preparation as required under Regulation 18, and in accordance with its adopted Statement of Community Involvement.

Set out below at each stage of the preparation is a list of ‘which’ bodies/organisations were invited to take part:

Issues and Options (December 2010 to January 2011)

- All the consultees on the Central Lancashire consultation database, including the statutory consultees as listed in the South Ribble Statement of Community Involvement.
- Local businesses
- Shoppers of all ages through consultation events at supermarkets across the borough
- Readers of the local press
- All residents
- Viewers of the council’s website
- Library/Post Office users
- Attendees at Area Committee meetings
- Members of the South Ribble Local Strategic Partnership groups
- Young people through youth groups
- Visitors to schools
- Patients at doctors/dentists surgeries
- Church attendees
- Users of community centres
- Disabled groups
- Users of church halls
- Leisure centre users
- Visitors to the Civic Centre

Preferred Options (November to December 2011)

- Statutory consultees as set out in the South Ribble Statement of Community Involvement – updated to reflect changes since its adoption.
- All people/organisations on the consultation database (approximately 1300 people/organisations). This includes people who made comments at the Issues and Options stage.
- Visitors to the Civic Centre
- Readers of local newspapers
- Users of the council’s website
- All residents via the council’s newspaper, Forward
- Shoppers of all ages through consultation events at supermarkets across the borough
- Library/Post Office users
- Visitors to schools
- Patients at doctors/dentists surgeries
- Church attendees
- Users of community centres
- Disabled groups
- Users of church halls
- Leisure centre users
- Visitors to the Civic Centre

Publication (July to August 2012)

- Statutory Consultees as set out in the South Ribble Statement of Community Involvement – updated to reflect changes since its adoption.
- All those recorded on our database who expressed an interest in the Site Allocations and Development Management Policies DPD (over 2,000 contacts)
- Shoppers of all ages through consultation events at supermarkets across the borough
- Readers of the local press
- All residents
- Viewers of the council's website
- Library/Post Office users
- Visitors to the Civic Centre

Additionally, the regulations require the Authority to provide a variety of methods to engage with bodies/organisations currently set out within our adopted SCI (SRSD004).

Below is a list of 'how' the Authority engaged at each stage of the process as required by Regulation 18:

Issues and Options (December 2010 to January 2011)

Letters/Emails

- Letters/emails were sent to all the consultees on the Central Lancashire consultation database, including the statutory consultees as listed in the South Ribble Statement of Community Involvement.
- Questionnaires were sent to all businesses held on the Council's business database held by the Economic Development team in December 2010.

Personal Contact

- Members of the Forward Planning Team were available during office hours throughout the consultation period to speak with the public/other interested parties. They were available for face-to-face contact at the Civic Centre, or by telephone or email.

Website/Press Releases/Forward Newspaper

- A quarter page item 'Your area, your choice' in the Winter 2010/11 edition of the Council's quarterly newspaper Forward (Issue 66) on page 4. These newspapers are delivered to every household in the borough and would therefore appreciate knowing if any areas are not receiving them.
- The opportunity to be involved in the consultation was promoted via our website and press releases/press notices.
- The Landowners' & Developers' Site Suggestions, Issues & Options Discussion Paper, was available as a download from the Council's website together with response forms.
- The council's website has a page dedicated to the emerging Local Development Framework which is regularly updated.
- January 2011 – press release to raise awareness of process and dates/venues of consultation events.
- February 2011 – press release raising awareness of process and fact that hundreds of responses had been received.

Posters/Leaflets

- Leaflets outlining the proposals and response forms were given out at all the consultation events and made available at the deposit points:
 - Civic Centre, Leyland
 - All libraries in the borough
 - Higher Walton Post Office
 - Gregson Lane Post Office
 - Samlesbury Post Office
 - Much Hoole Post Office
 - New Longton Post Office
 - New Longton Post Office
 - Walmer Bridge Post Office
 - Hutton Post Office

- Over 200 posters were displayed in:
 - Civic Centre, Leyland
 - All libraries in the borough
 - post offices
 - shops
 - doctors' surgeries
 - dentists' surgeries
 - church halls
 - churches
 - community centres
 - schools
 - leisure centres
 - bus stops
 - conservative club
 - nursery schools
 - parish/community noticeboards
 - community centres
 - pensioner meeting groups
 - colleges
 - Leyland market
 - South Ribble Disability Forum
 - WI hall

Deposit Points

- Copies of the document, map, CD (containing document and map), leaflets and consultation response forms were available at the following locations:
 - Civic Centre, Leyland
 - All libraries in the borough
 - Higher Walton Post Office
 - Gregson Lane Post Office
 - Samlesbury Post Office
 - Much Hoole Post Office
 - New Longton Post Office
 - New Longton Post Office
 - Walmer Bridge Post Office
 - Hutton Post Office

Public/Partner Consultation Events

- Copies of the document, map, CD (containing document and map), leaflets and consultation response forms were available at every event held for the public/partners:
 - Members of the Forward Planning team attended every Area Committee meeting (six meetings) or hosted additional events for the ones which were cancelled due to the bad weather just before Christmas 2010. These included the display of maps and interactive activities such as the use of post-it notes for attendees to place their suggestions on maps/feedback sheets. Small informal groups were used within these meetings to encourage participation by those who may not like to speak in public.
- Displays were set up in supermarkets to raise awareness of the process and how to respond to the consultation:
 - Booths at Penwortham
 - Leyland Market
 - Tesco Extra at Leyland
 - Sainsbury's at Bamber Bridge
 - Presentation given to South Ribble LSP Steering Group
 - Presentation given to South Ribble LSP People and Communities Group
 - Presentation given to South Ribble LSP Healthy Communities Group
 - Consultation event (People & Health Market) aimed at health sector partners of the South Ribble LSP.
 - Event held at Penwortham Youth Centre for young people.
 - Presentation to District Youth Council at Lostock Hall
 - Presentation to Leyland Youth Council
 - Presentation to Economic Partnership Group or South Ribble LSP
- Council Meetings/Ward Councillors/Parish Councils
 - All council meetings which have discussed the document are open to the public to attend.
 - Ward and parish councillors were kept fully informed throughout the process and provided essential liaison between planning officers and their constituents.
 - Presentation to Lancashire Association of Local Councils

Preferred Options (November to December 2011)

Letters/Emails

- It was resolved to contact all of the people/organisations in South Ribble that are on the consultation database. We also contacted the Statutory Consultees who are included on the consultation database. Approximately 1300 people/organisations, 400 of whom are on email, were contacted in this way. This number includes people who made comments at the Issues and Options stage. (See example Preferred Options letter attached separately as evidence of notification and availability of documents)

Personal Contact

- Members of the Forward Planning Team were available during office hours throughout the consultation period to speak with the public/other interested parties. They were available for face-to-face contact at the Civic Centre, or by telephone or email.

Website/Press Releases/Forward Newspaper

- The opportunity to comment on the Preferred Options document was promoted via our website and press releases/press notices.
- The Preferred Options Site Allocations & Development Management Policies DPD was available as a download from the Council's website together with response forms.
- The council's website has a page dedicated to the emerging Local Development Framework which is regularly updated.
- There was an article on page 9 of the Winter 2011 edition (Issue 70) of Forward, the council's newspaper which is delivered to every household in the borough.

Posters/Leaflets

- Over 100 posters were put on display across the borough at:

- Bus stops
- Conservative club
- Public/community noticeboards
- Community centres
- All libraries in the borough
- Churches
- Shops
- Leisure centres
- Post offices
- Church halls
- Senior citizens' social clubs
- Leyland Market
- Village Halls
- Colleges

Deposit Points

- The full documents were available for inspection at the following locations throughout the consultation period:
 - Civic Centre, Leyland
 - All libraries in the borough
 - Gregson Lane Post Office
 - Hoghton Post Office
 - Leyland Post Office
 - Penwortham Post Office
 - New Longton Post Office
 - Longton Post Office

Public Consultation Events

- Copies of the document, map, CD (containing document and map), leaflets and consultation response forms were available at each of the following events attended by members of the Forward Planning team:
 - Civic Centre, Leyland
 - Hoole Village Memorial Hall, Much Hoole
 - Morrisons at Bamber Bridge
 - St Catherine's Church Hall, Farington
 - Booths at Penwortham
 - Booths at Longton
 - Samesbury War Memorial Hall

- Morrisons at Leyland
- St Gerard's Parochial Centre, Lostock Hall
- Kingsfold Community Centre

Council Meetings/Ward Councilors/Parish Councils:

- Ward and parish councillors have been kept fully informed throughout the process and have provided essential liaison between planning officers and their constituents. The Team held Member Workshops to ensure they had up-to-date knowledge throughout the process, for example: all council meetings which have discussed the document were open to the public to attend.

Publication (July to August 2012)

Letters/Emails

- We have an extensive database of people who have expressed an interest in the Site Allocations DPD (over 2,000 contacts) who have all received letters or emails about this stage of the process. These included our statutory consultees (updated since the Statement of Community Involvement).
 - Over 440 emails
 - Over 1840 letters (See example Publication letter attached separately as evidence of notification and availability of documents)

Personal Contact

- Members of the Forward Planning Team were available during office hours throughout the period when representations could be submitted to speak with the public/other interested parties. They were available for face-to-face contact at the Civic Centre, or by telephone or email.

Website/Press Releases

- The opportunity to make representations has been promoted via a press notice.
- There have been several items in both the Lancashire Evening Post and the Leyland Guardian about various sites. These have usually followed or promoted public/council meetings.
- The opportunity to make representations was promoted on the council website. The DPD and representation forms were available as downloads from the website.

Leaflets

- Leaflets were available at all the deposit points and public events giving details of how to make representations.

Deposit Points

- The full document was made available in all South Ribble libraries and the Civic Centre.

Public Awareness Events

- Copies of the document, map, CD (containing document and map), leaflets and representation forms were available at each of the following:
 - - Staff were available to discuss issues and made CDs/maps/ representation forms available at various locations across the borough:

- Booths at Longton
 - Morrisons at Bamber Bridge
 - Morrisons at Leyland
- Information was made available at each Neighbourhood Forum (Eastern, Penwortham and Leyland) that took place between 5 July and 15 August, including the document and a CD.
- One ward councillor held a public meeting for his constituents to discuss the proposals.

Council Meetings/Ward Councillors' Parish Councils

- All council meetings which have discussed the document were open to the public to attend.
- Ward and parish councillors have been kept fully informed throughout the process and have provided essential liaison between planning officers and their constituents. All received a letter at the same time as the other consultees and a presentation was given to Cabinet Workshop in May.

This information was omitted from the Regulation 22 (1) (c) Report submitted to the Planning Inspectorate on 29 October 2012; however this addendum can be seen as evidence that the Authority has fully complied with all legal and procedural requirements, as asked in your first two questions in your letter dated 22 November 2012.

Appendix Two – ‘Amended Statement of Compliance’ SRE001

Addendum Topic Paper to Statement of Compliance SRE001

The Statement of Compliance report (SRE001) does include reference to the adopted Central Lancashire Core Strategy, in its role as the ‘parent DPD’ within the South Ribble LDF. The NPPF discusses the need for joint working and cooperation on strategic matters of which many have been explored and agreed within the Central Lancashire Core Strategy preparation and examination process. These joint working practices, some of which existed and some of which were instigated at the outset of a Joint Core Strategy, have largely been continued within the preparation of the Plan and as such their inclusion is helpful to assess the requirements for this DPD have been met.

This topic paper specifically deals with the three following questions, raised by the Inspector in a letter to the Authority on the 22nd November 2012:

1. Has the Authority satisfied the ‘duty to cooperate’ as indicated by S33A of the 2004 Act?
2. How the processes of cooperation have been developed and utilised?
3. What outcomes from the processes have been secured and whether they can be considered effective on all relevant issues, for example housing, nature conservation and necessary infrastructure.

1. Has the Authority satisfied the ‘duty to cooperate’ as indicated by S33A of the 2004 Act?

Yes, the Authority has complied with the ‘duty to cooperate’ regulation through a variety of measures including meetings, electronic communication, and telephone communication, with the list of prescribed bodies which are set out below:

- Environment Agency
- English Heritage
- Natural England
- Civil Aviation Authority
- Homes and Communities Agency
- Primary Care Trust
- Office of Rail Regulation
- Integrated Transport Authority
- Local Enterprise Partnership
- Local Nature Partnership (as set out in amended regulations)
- Local Authorities

Attached to this topic paper are a series of letters/emails prepared by the prescribed bodies as evidence that we have met the regulation. There are a few omissions from this list where the Authority is in discussion with bodies to have a letter/email of evidence submitted; once these are received they will be passed on in due course.

2. How have the processes of cooperation been developed and utilised?

The Authority has cooperated with the prescribed bodies in different ways and to varying degrees depending on the relevant strategic planning matters. Due to extensive ongoing cooperation between the three Central Lancashire authorities, specifically as a result of producing a Joint Core Strategy; these processes of cooperation are recorded separately.

Central Lancashire Authorities (Preston, Chorley and South Ribble, with Lancashire County Council)

- Establishment of a Joint Advisory Group (Members), Working Groups (Officers) and Joint Team (Officers) to guide evidence gathering and policy development of the Core Strategy, Site Allocations DPDs and a series of Joint SPDs.
- Commissioning of joint evidence base documents, used to inform the Core Strategy and Site Allocations DPDs (e.g. SHLAA, SHMA, Employment Land, Retail Study, Open Space and Playing Pitches Study, Water Cycle Study).
- Detailed Infrastructure Delivery Plan and Schedule prepared for Central Lancashire authorities, in collaboration with infrastructure providers.
- Advanced work on CIL charging schedule for all three Central Lancashire authorities, designed to secure funding from development to provide for appropriate infrastructure in Central Lancashire.

Wider cooperation processes beyond Central Lancashire

- Regular meetings and contact with neighbouring authorities on matters of joint importance, including Development Plans Officers' Group (DPOG) meetings every other month within Lancashire attended by development plans officers from all Lancashire authorities including Lancashire County Council.
- High level meetings and cooperation on the requirement, provision and establishment of an Enterprise Zone at BAE Systems at Samlesbury: with the Local Enterprise Partnership, Lancashire County Council, Ribble Valley Council and Blackburn with Darwen Council;
- Meetings and joint working to plan for retail, water, electricity and sport provision with commercial developers, utilities infrastructure providers and Sport England;
- Extensive meetings Transport and joint working, planning for highways, education and health provision: with the Highways Agency, Lancashire County Council and NHS Central Lancashire.
- Meetings, joint working and participation in the plan-making process for minerals and waste requirements, with minerals and waste operators and Lancashire County Council;
- Meetings and joint working to plan for habitats, landscapes and sustainable resources: with developers, Lancashire County Council, Environment Agency, and Natural England (as appropriate) and through the Habitats Regulations Assessment and Sustainability Appraisal assessment process.

3. What outcomes from the processes have been secured and can they be considered effective on all the relevant issues (i.e. housing, nature conservation, infrastructure etc.)

Housing

- RSS driven housing requirements adopted in the Core Strategy and effectively provided for in the Site Allocations and Development Management Policies DPD.
- Effective engagement with representatives of the housing development industry, through regular housing market meetings, SHLAA meetings and the joint preparation of Masterplans.
- No requirements to "export" South Ribble housing requirements to other authorities, or "import" other authorities' requirements into South Ribble.

Retail, leisure and commercial development

- Appropriate level of retail provision in keeping with Core Strategy and Central Lancashire Retail Study findings. No conflict with plans or provision in neighbouring authorities.
- Appropriate level of open space and playing pitch provision planned for (in respect of quantity, quality and accessibility), compatible with Open Space and Playing Pitch evidence

reports. No conflict with plans or provision in neighbouring authorities. Further guidance on open space opportunities is under included in a joint Central Lancashire Open Space SPD.

- Effective provision of employment land to meet jobs growth, and provide choice and flexibility in the market. Allocation of two strategic employment sites to meet the needs for sub-regional and regional employment demand. No conflict with plans or provision in neighbouring authorities.
- Adoption of Central Lancashire Rural Development SPD, preparation with other Central Lancashire authorities and comments taken on board through consultation process.

Infrastructure

- Transport infrastructure planned and informed by Lancashire County Council's Local Transport Plan, and the Central Lancashire Infrastructure Delivery Plan/Schedule. Further information included in site specific masterplanning documents, and the Central Lancashire Strategic Masterplan (with LCC, Preston and Chorley).
- Water based infrastructure (water supply, wastewater and flood risk) planned and informed by Central Lancashire Water Cycle Study undertaken by Halcrow and verified/approved by United Utilities. Detailed provision contained in the Central Lancashire Infrastructure Delivery Plan/Schedule. Further information included in site specific masterplanning documents.

Telecommunications

- Waste management and the provision of minerals planned and informed by documents prepared by Lancashire County Council for all Lancashire authorities. Detailed provision contained in the Central Lancashire Infrastructure Delivery Plan/Schedule.
- Energy infrastructure is planned and informed by evidence documents prepared for the Core Strategy, which also informed Core Strategy policies. Further guidance on renewable energy opportunities is under preparation in a South Ribble Renewable Energy and Low Carbon Economy SPD, which will be out for consultation in early 2013.
- No conflict with infrastructure plans or provision in neighbouring authorities.

Community and cultural infrastructure (including health and education provision) planned and incorporated into the Central Lancashire Infrastructure Delivery Plan/Schedule (with Lancashire County Council, NHS Central Lancashire). No conflict with plans or provision in neighbouring authorities.

Climate change mitigation and enhancement, and environmental conservation planned and informed by the correct recording of relevant environmental designations, and by robust policies to support the protection and enhancement of significant assets/features. Further clarified by incorporation of flood risk assessments into site allocations process (Environment Agency, United Utilities), extensive use of latest sustainability measures (eg Code for Sustainable Homes, BREEAM standards) in policies, Habitats Regulations Assessment, Sustainability Appraisal and Central Lancashire Design SPD. No conflict with plans or provision in neighbouring authorities.

Community Infrastructure Levy is anticipated to be one of the key mechanisms for funding infrastructure provision (in association with the Infrastructure Delivery Plan/Schedule). Consultation on the Draft Charging Schedule, which was informed by research undertaken by specialist consultants, ended in November 2012. A number of representations were received on this paper. There will be an examination into the CIL Charging Schedule anticipated spring 2013.

As a result of the additional information provided above and in light of the letters attached as evidence, the Authority is satisfied that it has met the legal requirement; duty to cooperate.

Evidence letters/emails submitted to support the Authority's duty to cooperate requirement

See separate document with letters/emails received to date.

Appendix Three Central Lancashire Local Development Scheme March 2011

See separate document.

Appendix Four – Relationship between the RSS and South Ribble Local Development Framework

Table One: Relationship between the RSS and the Central Lancashire Core Strategy

Central Lancashire Core Strategy/RSS	
Paragraph Number in Core Strategy where reference appears	Reference to RSS
2.5	This Strategy provides the overall framework for development and investment in the North West region to 2021. It establishes a broad vision for the region and sub-regions, prioritised growth and regeneration and provides policies to achieve sustainable development. It also establishes the principle of “marrying opportunity and need” throughout the North West. The Government intends to revoke the Regional Strategies in England through enactment of the Localism Bill.
5.10	The Growth Point national initiative was conceived as a way of stimulating the housing industry and improving the availability of housing, by inviting local authorities to bid for public pump priming monies for investment in infrastructure. Across Central Lancashire and Blackpool the aim in the Growth Point bid submitted by the participating councils was to uplift the numbers of new dwellings built by 2017 by more than 30% above the provision levels in the Regional Strategy (RS). The successful bid did not change the overall housing provision requirements, but was designed to bring a greater proportion of new housing forward for construction up to 2017.
5.12	The RS annual housing provision levels for the three Central Lancashire Districts added up to approximately 1340 dwellings. Instead of this annual figure being exceeded with the injection of Growth Point funds, house building rates fell substantially with the onset of the recession, because the shortage of loan finance has affected home buyer purchasing power and developers’ ability to pre-fund schemes. This is especially so in Preston with the high number of City Centre apartment schemes dependent on buy to let mortgages which were withdrawn by lenders. Taken together these factors contribute towards deciding what housing requirements should now apply.
5.43	The new CBD covers a gross area of approximately 37 hectares occupying a pivotal location covering the western and north-western sides of the city centre. It has significant locational advantages in terms of its position between the main rail station, the University of Central Lancashire (UCLan) campus and the main retail and civic areas of the city centre. It is highly accessible by all modes of transport. The new CBD is expected to provide up to around 175,000 sq. m of high quality modern office development and a range of complementary uses such as hotels, conference facilities, residential (including live-work units), restaurants and pubs and ancillary retail facilities. A supplementary planning document has been produced to guide the development of the CBD consistent with national planning policy and the North West England Plan Regional Strategy to 2021. This was adopted by Preston City Council on 6 April 2011.

Central Lancashire Core Strategy/RSS	
Paragraph Number in Core Strategy where reference appears	Reference to RSS
8.4	The Regional Strategy (RS) sets out housing requirements for each authority, informed partly by future household projections as well as optimistic future economic growth assumptions. Being derived from preparatory work done before the recession, the RS housing requirement figures did not take account of the economic downturn that started at the end of 2007 and the severe effect it had on the delivery of new housing. The proposed revocation of the RS and the Coalition Government's associated 'localism' agenda will give local authorities the scope to produce locally derived housing requirement figures. It is intended that the Central Lancashire authorities will monitor and review the housing requirements in the Core Strategy for the lifetime of the plan.
8.6	The Growth Point aimed to uplift the rate of house building to a level of over 30% above RS levels for the period to 2017. However, the recession and reduced Growth Point funding has made such an uplift unlikely. In any event there was no intention to exceed the RS total requirement to 2021 or beyond.
8.7	The number of new households forming is partly influenced by economic circumstances which in turn also affect the financial ability of households to live in separate dwellings. The 2006-based household projections (by the Office of National Statistics (ONS) predict that there will be 30,000 more households in Central Lancashire in the 20 years up to 2026 - the end of the Core Strategy plan period. The ONS projections are higher than those used to determine the RS housing requirements. However they are not formal policy figures and may prove to be too high because (amongst other things) household formation is both deferred and concealed during times of recession.
8.8	Building trends across Central Lancashire as a whole show that RS targets have not been met in the past four years (see table opposite). There are a number of contributory reasons including: the economic recession, lack of availability of finance for developers and prospective home owners, and an undermining of investment confidence. House building rates in the most recent year (2009/10) are a particular concern. They appear to show the housing market performing differently across Central Lancashire with high dwelling completions in Chorley, much lower levels of construction in South Ribble and very few new homes built in Preston.
8.13	Table 4 reproduces the RS housing land requirements for the three Central Lancashire Districts. These are minimum requirements, net of demolitions. The RSS explains this in the following terms. "The overall housing requirement figures ... and the annual average figures are not absolute targets and may be exceeded where justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub-regional strategies."

Central Lancashire Core Strategy/RSS	
Paragraph Number in Core Strategy where reference appears	Reference to RSS
8.15	The RS sets a target of “at least 70%” of new housing being provided on previously developed (brownfield) land. National planning policy has now reclassified residential gardens as greenfield land. However even after taking account of this change in respect of housing development of such land both in terms of past performance and likely future trends, (derived from the SHLAA evidence) a 70% target is still achievable. In the event that an upturn in the house building market takes longer than expected, authorities will need to be flexible in their approach to meet the housing delivery requirements but there will be no compromise on overall design standards. Regular monitoring will be undertaken and analysis of data to understand trends and predict future outcomes.
Page 71	Table 4: Housing Requirements in Central Lancashire Authority RSS Annual Requirement* (dwellings) Preston 507 Chorley 417 South Ribble 417 Central Lancashire (total) 1,341 * Net of demolitions
9.20	Preston is the main retail and service centre in Central Lancashire, and is ranked first in the Lancashire sub-region for its non-food (comparison) shopping. It is the centre for commercial and administrative activity, with proposals for a Central Business District development close to the railway station. The City Centre requires further investment if it is to maintain and improve its overall performance, in accordance with RS policies W1 and W5. Major retail investment in Preston City Centre will benefit the whole of Lancashire by providing higher order comparison shopping within the sub-region, thereby reducing the need for longer trips to Manchester and Liverpool.

Table Two: Relationship between the RSS and the Plan

Site Allocations and Development Management Policies DPD 'The Plan'/RSS	
Paragraph Number in the Plan where reference appears	Reference to RSS
2.19	Although it is the government's intention to revoke this guidance through the enactment of the Localism Bill, it is still in force and accordingly, this document has to be in conformity with it.
7.3	Policy 4 of the Central Lancashire Core Strategy sets out the number of new houses required in the Borough in line with figures contained in the Regional Spatial Strategy, which equates to 417 dwellings per year from 2010 – 2026, this is a total of 6,255 dwellings for the 15 year Plan period. Since 2010 there has been low build rates in the Borough which has therefore resulted in a shortfall of 560 units, which will be made up within the Plan period.
9.24	The partial review of the Regional Spatial Strategy for the North West (March 2010) proposed changes to car parking standards which were largely agreed across the Central Lancashire authorities (including Lancashire County Council). The following policy endorses the standards as contained in the RSS partial review, as agreed within Central Lancashire.