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HOUSING AND ECONOMIC DPD

EXAMINATION

HOUSING POSITION PAPER and RESPONSE TO FURTHER SUBMISSION BY SPORT ENGLAND IN RELATION TO POLICY OS1

5 DECEMBER 2018

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HOUSING POSITION PAPER

1. INTRODUCTION

- 1.1 The Council has prepared this position statement to inform the Examination of the Ribble Valley Housing Economic Development DPD. This paper focuses on housing and is intended to deal with a number of matters raised as a result of the Council's approach to five year land supply following submission of the Plan to the Secretary of State and its treatment of sites to be considered for allocation.
- 1.2 The paper sets out the Council's position in relation to the following key areas.
 - 1. Five year housing supply and the actions undertaken by the Council in response to changing national policy requirements, Inspectors' determinations at appeals and the dynamic context of housing land supply within the borough.
 - 2. The Council's position on the relevant buffer.
 - 3. The housing trajectory.
 - 4. Overview of delivery against the proposed Plan strategy with particular reference to the Standen strategic site and development at main settlements.
 - 5. The process undertaken by the Council in relation to site selection, including the sustainability appraisal
 - 6. The conclusion in relation to the Plan delivering against identified housing requirements.

2. BACKGROUND

2.1 The HEDPD is a daughter document to the Core Strategy and sets out the provisions for allocations to meet the identified housing and employment land requirements set out in the Core Strategy. The HEDPD itself has a narrow focus given the extent of development already committed in the area and what is considered necessary to achieve the requirements of the Core Strategy. It also provides a vehicle to provide an updated proposals map in conjunction with the allocations process. The Council adopted its Core Strategy on 16 December 2014 having had it found sound and this plan remains the current up to date, adopted plan that sets a strategic framework for the borough.

3. NATIONAL POLICY

3.1 The Core Strategy and the HEDPD were prepared before the publication of the revised NPPF in September 2018. The HEDPD was submitted in September 2017 and as such rests to be examined against the 2012 NPPF. The council has however throughout the period following submission of its HEDP had to respond to issues in relation to 5 year supply which has included publishing an updated supply statement following the publication of the 2018 NPPF and the associated National Planning Policy Guidance (published on 23rd September 2018 which required a differing approach to land supply assessment).

4. CORE STRATEGY AND HOUSING REQUIREMENTS

- 4.1 The Core Strategy establishes amongst other things the development strategy for the borough over the current plan period up to 2028. The plan identifies the objectively assessed need for the plan period and identifies a pattern of distribution for housing that reflects the development strategy.
- 4.2 The Core Strategy at paragraph 4.11 summarises the strategic pattern of development required to address the Objectively Assessed Need of 5600, taking account of what development had already been committed within the plan period from 2008. The resultant distribution was as follows:

Location	Residual number of houses required for each settlement
Clitheroe	240
Longridge	633
Whalley	0
Other Settlements	145
Standen	1040
Total	2058

- 4.3 The HEDP from this starting point set out at Submission, the allocations necessary to deliver the plan based on the Housing Land Availability survey position at April 2017. This was for development in Mellor and Wilpshire being the two locations were a residual against planned requirements existed.
- 4.4 Appendix 1 sets out the current position monitored against the Core Strategy.

5. THE BUFFER

- 5.1 The Council considers that the relevant buffer to apply is 5% in line with NPPF. The Council's position on this was previously based on the emerging methodologies of the Housing Delivery Test (HDT), and what is now current Government policy. The direction of travel was set by the publication of the Housing White paper, the associated consultations on the HDT methodology and the draft NPPF. It was the council's position that each successive consultation continued to promote the interpretation of under-delivery which was not defined previously and that this led to the adoption of the 5% approach. The council maintains its position that given the publication of the revised NPPF which confirmed the governments approach and the HDT and its associated rule book the Council, given the levels of delivery over the previous 4 years, is a 5% authority for the purposes of assessing housing land supply.
- 5.2 Whilst the 2012 NPPF promoted the policy of 5% buffer and 20% buffer where there was a record of under-delivery, it did not in itself establish how that was to be defined. The council's position prior to the publication of the revised NPPF in July 2018 and the HDT, relied upon the fact that the various consultation documents did provide a clear direction of travel as to how the government was anticipating the issue of under delivery being assessed. This has now been clarified by the published policy.
- 5.3 Consideration also needs to be given to the position the Council has been in over recent years in addressing delivery where it has been criticised for under delivery.

Ultimately the Local Planning Authority is only in a position to grant planning permissions to facilitate delivery. This the Council has done.

- 5.4 It is also important to bear in mind the relative context within which housing requirements were being addressed. The Council has previously applied a 20% buffer, reflective of the position when the Core Strategy was emerging and that completions were lagging behind a changing strategic requirement. However, this position has changed significantly as the Council has undertaken steps to address requirements including the adoption of the Core Strategy. Delivery has significantly increased, markedly so, in the past 4 years such that the Council is in a position where a 5% buffer is relevant.
- 5.5 It is also helpful to understand that a variety of matters had an impact on the housing requirement position due to changes in strategic policy. This included the switch from the Joint Lancashire Structure Plan (JLSP) to Regional Spatial Strategy (RSS). The relevant housing figure having previously been established through the Joint Lancashire Structure Plan (which rendered the borough as an area of housing restraint with planning permissions not in place to deliver at the point of the RSS being implemented) and then the move to a Regional Spatial Strategy based figure in 2008, together with factors such as the impact of the recession from 2007 onwards which had the wider effect of slowing development in general together led to a position of undersupply.
- 5.6 The publication of the Regional Spatial Strategy in September 2008 established through Policy L4 a housing requirement for Ribble Valley of 161. This figure was used for determining planning applications and for monitoring supply. Prior to this, a housing requirement of 55 units per annum was in place, established by the Joint Lancashire Structure Plan, with a consequent result of the application of a housing moratorium for a number of years up until September 2008 when the RSS was introduced. The Regional Spatial Strategy was abolished in May 2013. The RSS figure of 161 was superseded by a revised housing requirement of 200 dwellings per annum established through the evidence base work of the emerging Core Strategy which was adopted for development management purposes in October 2013 but which had been applied informally for the purposes of monitoring following submission of the Core Strategy in September 2012. The current housing requirement of 280 dwellings per annum was established following the Examination of the Core Strategy and its subsequent adoption in December 2014. Despite this starting position at the point of delivering the adopted Core Strategy the Council has undertaken positive steps to increase the supply of relevant approvals. This is effectively the principle role for the Local Planning Authority.
- 5.7 Since 2008, completions have picked up overall, with a marked increase from 2014 following adoption of the Core Strategy as planning permissions were granted and implemented. This is illustrated in the accompanying Trajectory included in this position paper. Furthermore, for the last four monitoring years completions have in fact exceeded the annualised Core Strategy requirement. What needs to be borne in mind is that the Council would only be in a position to deliver against the figure of 280 at the point it was introduced in the Core Strategy in Dec 2014, as prior to this the Council was determining applications against differing requirements.
- 5.8 Given the recent clarification on delivery and the extent of completions and planning permissions granted the Council is satisfied that the relevant buffer to apply is 5%.

6. 5 YEAR LAND SUPPLY

- 6.1 The Councils current published assessment (see Post 2.26, 2.27 and 2.28) is that it can demonstrate a 6.1 year supply of housing land. Since the submission of the plan the Council has continued to monitor and review its housing land position in response to a number of factors and has continued to approve sustainable development in accord with the Development Strategy set out in the Core Strategy. This has seen a complexity of circumstances in relation to the council's 5 year land position since submission and it is considered important to have an understanding of the circumstances behind the supply position.
- 6.2 The Council monitors housing land on an on-going basis and has previously published HLA information on a quarterly basis in response to the dynamic nature of land supply in the borough. The Core Strategy anticipated quarterly reports. Current practice is to publish a monitoring report on a 6 monthly basis. This information feeds into the Council's Authority Monitoring report published annually. The Council also publishes interim statements in response to planning appeals.
- 6.3 This was the circumstance the Council was working with post submission of the HEDPD where interim information was published in relation to an Appeal for land at 74 Higher Road Longridge (Appeal reference APP/T2350/W/17/3186969). This appeal changed from Written Representations to a Hearing which took place on 17 April 2018. The Housing land supply data for the appeal was base dated October 2017 and updated by way of a Statement of Common Ground submitted at the hearing. The Inspectors decision was published on 22 May 2018, and gave a conclusion on his assessment of site delivery and of the Councils approach to the buffer at that time.
- 6.4 With regard to the Council's position on the applicable buffer he found that the application of a 5% buffer was premature as it relied upon the application of methodologies that were at that time subject to consultation. He did recognise (para 17 of the decision letter) that housing delivery in the Ribble Valley had exceeded the annual requirement set out in Key Statement H1 of the Core Strategy for the last 3 years. His position on the supply at that time was that applying a 20% buffer the supply position was 4.5 years. The key aspect here is that his decision in relation to the applicable buffer was related to the status of the methodologies at that time in May. This position changed subsequently with the publication of the updated NPPF in July 2018.
- 6.5 As part of normal practice the Council continued to monitor housing land and published its March18 based Housing Land Availability Supply report at the beginning of July for a special meeting of the Planning and Development Committee on 17 July 18. A copy of the committee report is in the evidence library as Post 2.25. This review took account of the findings on Higher Road in relation to the Inspectors conclusions on the application of the relevant buffer giving a position in relation to both a 5% buffer and a 20% buffer, and whilst some amendments to the methodology were also made the Council mindful of the implications of assessing the supply against both a 5% buffer and a 20% buffer set out proposals for additional housing sites.
- 6.6 In the light of this assessment the Council considered a further report at its Special Committee meeting on the 17 July in relation to proposing additional housing sites to ensure supply could be delivered in the event of a 20% buffer being required. A copy of the relevant report is in the evidence library as Post 2.25. This led to the

publication for consultation of potential additional sites. The process for site selection is dealt with later in this paper.

- 6.7 In parallel with the Higher Road hearing, the Council was also dealing with a further appeal (reference APP/T2350/W/17/3185445), which opened as a Public Inquiry on the 1 May, but was immediately adjourned. At the point of exchange of evidence this appeal was also reliant upon the October 17 base date for the Housing Land evidence, with a view to providing by way of a Statement of Common Ground an updated position for the Inquiry. Following the adjournment of the Inquiry a new date was set for 9 and 10 October 18. In preparing evidence for this, the Council updated the March based survey for the purposes of the appeal to 31 July and this was published on 11 September at exchange. Ultimately the Inquiry was adjourned on opening and re-opened as a Hearing in the light of the agreed position between the parties.
- 6.8 The position had changed again in dealing with that appeal from a housing land viewpoint when, following the publication of the Governments updated National Planning Policy Guidance in September 2018 the supply position had to be reassessed as a consequence of the new guidance. It was determined that on the evidence available to the council it could not demonstrate, with clear evidence a 5 year supply.
- 6.9 The Council position was that in the light of the new guidance it could demonstrate a 4.9 year supply with a 5% buffer, or 4.3 years with a 20% buffer. The appellant's assessment was a supply of 4.41 years (5 % Buffer) and 3.98 years (20% buffer) based on their discounting of sites which in the event wasn't tested. At the point the Council recognised it had moved below 5 years it accepted that the tilted balance was triggered and this was set out in a statement of common ground. No evidence was presented to the Hearing on housing land supply matters. The appeal was dismissed on landscape and visual grounds.
- 6.10 As part of its monitoring work the council prepared its September base dated report as part of its usual monitoring process and undertook an extensive exercise to gather evidence in line with the requirements of government guidance. The September based Housing Land Survey was published together with its associated evidence and the 5 year Housing land Statement document on the Councils web site on 19 November. This assessment demonstrates that the council has a 6.1 year supply of housing land.

7. THE HOUSING TRAJECTORY

7.1 The Council has prepared a housing trajectory which is shown on the graph contained in Appendix 2 together with a detailed assessment of anticipated delivery from existing housing commitments.

8. HOUSING AND ECONOMIC DEVELOPMENT DPD (HED DPD) HOUSING SITE ALLOCATION SELECTION PROCESS

Regulation 18 Issues and Options stage 926/8/16 to 7/10/16

8.1 The initial work on this matter began at the Regulation 18 Issues and Options Consultation (Reg 18) This consultation is summarised within the Approach to Plan Preparation document (Supp 1.39) that was put into the public domain at the following Regulation 19 stage of the HED DPDF held from 28/4/17 to 9/6/17. A summary of its responses were also sent as a part of the later Submission Version material as the Regulation 17 Consultation Statement (Supp 1.35).

- 8.2 As Supp 1.39 sets out (Page 3) the Reg 18 consultation set out 9 potential housing site allocation options that were drawn from the 2013 Strategic Housing Land Availability Assessment (SHLAA). Site selection from the SHLAA, and indeed the Reg 18 consultation itself in relation to housing sites, was limited to those relating to settlements (Wilpshire, Mellor and Chatburn) that at the time of the Reg 18 consultation still had a residual requirement for housing against the requirements set out in the adopted Core Strategy (Supp 1.6).
- 8.3 In addition to the SHLAA- derived sites the Reg 18 consultation also initiated a Call for additional sites, again predicated only on those above settlements still having a residual housing requirement against the Core Strategy needs.
- 8.4 For more detail on the Reg 18 consultation please see the RVBC website, more specifically the Regulation 18 Issues and Options Consultation Housing and Economic Development DPD August 2016 document (see link below). https://www.ribblevalley.gov.uk/download/downloads/id/10734/regulation_18_consult ation_document.pdf
- 8.5 Also the Reg 18 consultation included a Sustainability Appraisal (SA) Scoping Report. As mentioned above the Reg 18 consultation responses were also summarised within the regulation 17 Consultation Statement (Supp 1.35)
- 8.6 As Supp 1.35 and Supp 1.39 mention, the Reg 18 consultation Call produced an additional 33 sites, 23 of which related only to housing sites and the majority of which did not relate to the specific settlements the consultation was focused on. All the Reg 18 Call sites set out in Appendix 3 of Supp 1.39 were also subject to SA testing (see Supps 1.29, 1.30 and 1.31). The 33 sites that were submitted through the Regulation 18 consultation Call for Sites and set out in Supp 1.39 are attached to this report as Appendix 3.

Regulation 19 Preferred Options stage (28/4/17 to 9/6/17

- 8.7 Supp 1.39 set out which housing sites were to be selected as preferred allocations from all those sites put forward at Reg 18 stage, together with a reasoned justification of their qualities. In doing so Supp 1.39 also referred to the SA assessments (Supp 1.29, Supp 1.30 and Supp 1.31) of those sites that also included in the Reg 19 consultation. The selected sites (Housing Allocation Sites HAL1 in Mellor and HAL2 in Wilpshire) were then put into the Regulation 19 consultation report "Regulation 19 Publication Version of the HED DPD" April; 2017 (see Supp 1.28), together with other relevant documents such as the SA,
- 8.8 The results of the Regulation 19 consultation as redacted original individual responses are set out in Supp 1.25.
- 8.9 The Council's responses to the above are contained in Regulation 22 (1) (c) (v) Supp 1.36

Regulation 22 Submission Stage (31/7/17 to 11/9/17)

8.10 In the light of the Reg 19 consultation responses mentioned above changes were made to the Publication Version, such as an amended southern boundary to HAL2, and these were set out in the Identified Changes Schedule (see Supp 1.27). These

changes, together with employment land allocations and other associated elements were then submitted for examination as the HED DPD Submission version on 28th July 2017 (see Supp 1.26) and, together with associated SA material and changes to the Proposals Maps, comments invited via a parallel consultation that ran between July and September 2017, the responses to which were sent to the Inspectorate.

8.11 It should be noted that by the time of submission, due in part to the on- going consideration of planning applications during the development of the DPD, formal housing allocations to address the remaining residual housing needs related only to Wilpshire and Mellor.

Proposed Main Modifications Additional Housing Allocations (28/7/18 to 7/9/18)

- 8.12 After Submission there were a variety of delays in beginning the HED DPD's examination that were beyond the Council's control. During that period there were changes to the Council's underlying housing supply figures as set out in the Housing Land Availability Report of July 2018 (see Post 2.24) that led to a re- consideration of its five year housing land supply position. To address this additional Borough- wide housing land need, as opposed to the previous residual requirements in Wilpshire and Mellor shown above and set out in the Submission Version, it was decided to seek additional allocations to be considered as possible Main Modifications.
- 8.13 As mentioned above previous consultations had involved the submission of a variety of sites that were rejected from allocation in the Submission version as they did not address the formal residual needs in Wilpshire and Mellor. However these sites, which comprised up to date information, were considered relevant to consideration for allocation in relation to this newly emerged Borough wide need and, rather than delay the HED DPD process further than was necessary, the Council took the pragmatic decision to screen them through a new site selection process for possible allocation rather than put out a further formal Call for sites.
- 8.14 Selection criteria were developed to screen the previously rejected sites and set out in a report to a Special Planning and Development Committee meeting of 17th July 2018 (see Post 2.25) together with a suggested series of sites that were felt to pass the selection tests as potential allocations. Councillors considered the sites set out in the report, heard a variety of verbal representations regarding some of them and made a selection of sites which were then consulted on as Proposed Main Modifications to the Regulation 22 Submission version in July to September 2018 (see Post 2.21). These sites were also accompanied by an additional revised SA (see Post 2.22). Responses to this consultation were sent to the Inspectorate (see Post 2.20).

9. CONCLUSIONS

9.1 The council is satisfied that it can demonstrate a 5 year supply with the appropriate buffer and is meeting the requirements of the Core Strategy. The trajectory illustrates that the requirement can be met over the plan period and in any event the council will be undertaking a review of the Core Strategy during 2019 a part of the required review process which will provide the most appropriate opportunity to make any adjustments to housing delivery including reviewing the housing requirement in line with the governments standard methodology.

Settlement	Total dwellings required 2008-28 A	Dwellings built 2008 – 30 th September 2018 B	Dwellings with pp at 30 th September 2018 C	Residual at 30 th September 2018 A-(B+C) 0 indicates requirement already met	Permissions granted prior 01/10/2018 - Awaiting S.106 to be signed	Permissions granted 1/10/18 onwards – net additions or losses only	Interim residual at 30/11/18
Principal Sett	lements						
Clitheroe	2320 of which 1040 = Strategic site leaving: 1280	812 (Of which 20 have been completed at Standen) So 812-20 = 792	1700 (Of which 1040 is at Standen) So 1700- 1040 = 660	0 (-172)		 3/2018/0008 – 30 Peel Park Avenue, Clitheroe – Date of Decision 30/10/2018 – Net addition of 33 dwellings to supply. 3/2017/0653 – Land at Chatburn Road, Clitheroe – Date of Decision 23/11/2018 (Outline for 23 on site already in supply) – Net addition of 7 dwellings to supply. 3/2018/0510 – Land adj. Black Horse Inn, Pimlico Road – Date of Decision 23/11/2018 – Net addition of 6 dwellings to supply. 3/2018/0744 – 3 King Street, Clitheroe – Date of Decision 21/11/2018 – Net addition of 3 dwellings to supply. 	0 (-221)
Longridge	1160 (less 200 Longridge adj – to account for development adj. =960	318	1003	0 (-361)		3/2018/0701 – 55 Derby Road, Longridge – Date of Decision 20/11/2018 – Net addition of 2 dwellings to supply.	0 (-363)
Whalley	520	255	297	0 (-32)			0 (-32)
Strategic Site		1					
Standen	1040	20	1020	1020			

Settlement	CS Total dwellings required 2008-28	Dwellings built 2008 – 30 th September 2018	Dwellings with pp at 30 th September 2018	Residual at 30 th September 2018	Permissions granted prior 01/10/2018 - Awaiting S.106 to be signed	1/10/18 onwards – net additions only	Interim residual at 30/11/18
Tier 1	Settlements						
Barrow	710	226	441	43			43
Billington	76	57	61	0 (-42)			0 (- 42)
Chatburn	27	10	16	1			1
Gisburn	16	36	5	0 (-25)			0 (-25)
Langho	21	2	23	0 (-4)			0 (-4)
Mellor	38	20	1	17			17
Mellor Brook	23	2	17	4			4
Read & Simonstone	45	18	26	1			1
Wilpshire	66	21	20	25		3/2018/0723 – Pyethorn Meadows, 150 Whalley Road, Wilpshire – Date of Decision 10/10/2018 – Net addition of 1 dwelling to supply	24

Housing Trajectory 2008 – 2028

The graph below illustrates the trajectory of housing over the plan period (2008 - 2028) and includes the following data:

- The red line on the graph represents the annualised requirement of 280 dwellings a year.
- The black line represents the adjusted target when taking into account any shortfall of delivery over the previous years. The data for this can be found at Table 1 below.
- The green columns represent actual completions up to the 30th of September 2018. The data for this can be found on page 1 of the published '5 Yr Supply Housing Land Availability Survey (HLAS)'. See link below to view the full document: https://www.ribblevalley.gov.uk/download/downloads/id/11995/housing land availability_survey_october_2018.pdf
- The blue columns represent projected delivery from the 30th September 2018 to the end of the plan period. Table 2 below provides an outline of expected delivery based upon various evidence as outlined within the document '5 Yr Supply Evidence of Delivery' and the '5 Yr Supply Housing Land Availability Survey (HLAS). See link below to view both documents:

https://www.ribblevalley.gov.uk/downloads/download/7171/housing_land_availability_surveys_and_reports

• Each site and a brief explanation of the proposed delivery can be found at Appendix A

The following table and graphs clarify the following position:

- No. of Dwellings to be delivered over the Plan Period = 3289
- No. of Dwellings to be delivered beyond the Plan Period = 532
- No. of Dwellings to be delivered over the Plan Period (3289) + No. of Actual Completions up until 30th September 2018 (2362) = 5651

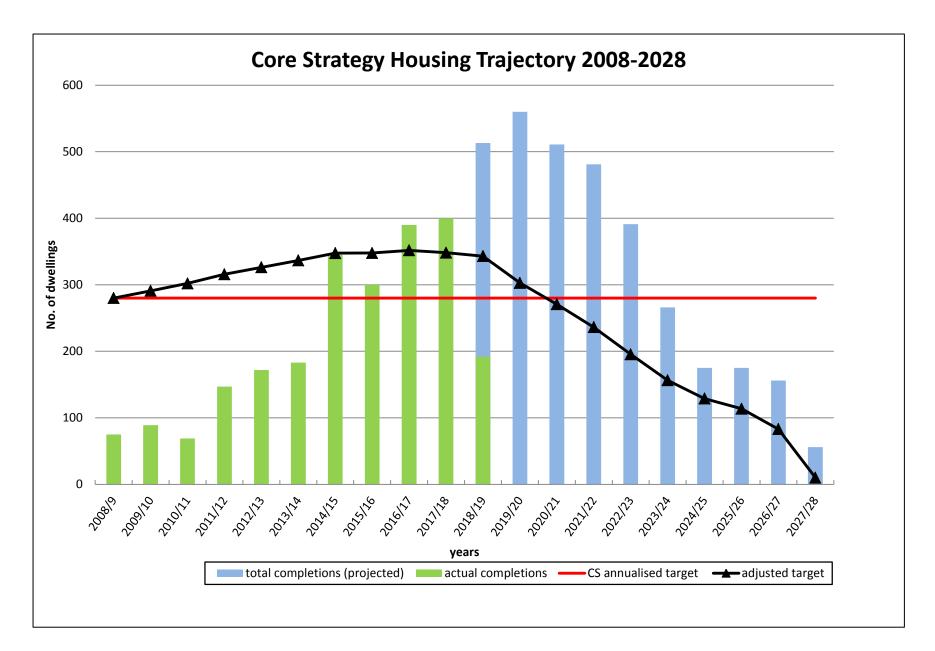


TABLE 1

Housing Trajectory														
	remaining years	CS annualised target	actual completions	cumulative completions	total completions (projected)	adjusted target								
2008/9	20	280	75	75	0	280								
2009/10	19	280	89	164	0	291								
2010/11	18	280	69	233	0	302								
2011/12	17	280	147	380	0	316								
2012/13	16	280	172	552	0	326								
2013/14	15	280	183	735	0	337								
2014/15	14	280	345	1080	0	348								
2015/16	13	280	300	1380	0	348								
2016/17	12	280	390	1770	0	352								
2017/18	11	280	400	2170	0	348								
2018/19	10	280	192	2874	512	343								
2019/20	9	280	0	3433	559	303								
2020/21	8	280	0	3943	510	271								
2021/22	7	280	0	4429	486	237								
2022/23	6	280	0	4827	398	195								
2023/24	5	280	0	5086	259	155								
2024/25	4	280	0	5261	175	129								
2025/26	3	280	0	5436	175	113								
2026/27	2	280	0	5593	157	82								
2027/28	1	280	0	5651	58	7								
TOTAL		5600	2362		3289									

<u>TABLE 2</u>

Name of Site	Developer	Total No. of Dwellings Granted Permission On Site	Total No. of Completions up to 30th September 2018	Total No. of Dwellings Remaining to be Completed On Site	Yr 1 1st Oct 2018 - 30th Sep 2019	Yr 2 1st Oct 2019 - 30th Sep 2020	Yr 3 1st Oct 2020 - 30th Sep 2021	Yr 4 1st Oct 2021 - 30th Sep 2022	Yr 5 1st Oct 2022 - 30th Sep 2023	Yr 6 1st Oct 2023 - 30th Sep 2024	Yr 7 1st Oct 2024 - 30th Sep 2025	Yr 8 1st Oct 2025 - 30th Sep 2026	Yr 9 1st Oct 2026 - 30th Sep 2027	Remaining 6 Months of Plan 1st Oct 2027 -30th March 2028	Number to be delivered beyond the plan period
Land East of Clitheroe Road, Whalley (Lawsonsteads)	Potential Developer - Laurus Homes in partnership with Trafford Housing Trust.	160	0	160	0	0	0	0	0	36	36	36	36	16	0

Land to south-west of Barrow & west of Whalley Road, Barrow (Parcel B)	BDW North West & Taylor Wimpey	225	0	225	0	30	50	50	50	45	0	0	0	0	0
Land at Accrington Road, Whalley	Oakmere Homes	77	0	77	0	0	15	30	32	0	0	0	0	0	0
74 Higher Road, Longridge	Not Known	122	0	122	0	0	0	0	0	15	30	30	30	17	0
Higher Standen Farm - 2nd Phase	Taylor Wimpey	812	0	812	0	0	20	40	40	40	40	40	40	20	532

Land off Waddington Road, Clitheroe	Barratts & David Wilson Homes	207	0	207	0	30	50	50	50	27	0	0	0	0	0
Land East of Chipping Lane, Longridge - Phases 2 & 3	Barratt Homes	239	0	239	0	20	34	34	34	34	34	34	15	0	0
Land at Higher Standen Farm, Clitheroe (Phase 1)	Taylor Wimpey	228	20	208	50	50	48	45	15	0	0	0	0	0	0

Land to south-west of Barrow & west of Whalley Road, Barrow (Parcel A)	Redrow	183	4	179	30	30	30	30	30	29	0	0	0	0	0
Land North of Dilworth Lane, Longridge	Taylor Wimpey	195	58	137	34	37	33	33	0	0	0	0	0	0	0
Land East of Chipping Lane, Longridge Phase 1	Barratt Homes	124	0	124	20	34	34	34	2	0	0	0	0	0	0
Land off Dale View, Billington	H & H Homes Ltd	41	0	41	0	10	10	10	11	0	0	0	0	0	0
Mills Way, Chipping	Chipping Homes Ltd	39	0	39	0	20	19	0	0	0	0	0	0	0	0

Greenfield Avenue, Clitheroe	Prospect Homes	36	0	36	34	2	0	0	0	0	0	0	0	0	0
Land off Mill Lane, Gisburn		3	0	3	1	2	0	0	0	0	0	0	0	0	0
Land off Longsight Road, Langho	Pringle Homes	18	0	18	0	4	4	5	5	0	0	0	0	0	0
Spout Farm, Preston Road, Longridge		34	0	34	0	8	8	9	9	0	0	0	0	0	0
Land r/o Pendle Street East, Sabden		17	0	17	0	4	4	4	5	0	0	0	0	0	0
Former Victoria Mill, Sabden	Skipton Properties	30	0	30	15	15	0	0	0	0	0	0	0	0	0

Oakhill College, Wiswell Lane, Whalley		6	0	6	0	0	2	2	2	0	0	0	0	0	0
Old Row, Whalley Road, Barrow	Trafford Housing Trust	23	0	23	0	19	4	0	0	0	0	0	0	0	0
Land Malt Kiln Brow, Chipping		4	0	4	0	0	4	0	0	0	0	0	0	0	0
Land at Chatburn Road, Clitheroe	Oakmere Homes	23	0	23	0	10	13	0	0	0	0	0	0	0	0
Land off Henthorn Road, Clitheroe	Unknown	24	0	24	0	12	12	0	0	0	0	0	0	0	0
Land Whalley Road, Mellor Brook		5	0	5	0	0	2	2	1	0	0	0	0	0	0

Land Worthalls Farm, Westfield Avenue, Read		15	0	15	0	3	3	4	5	0	0	0	0	0	0
1-9 Stonewater Close, Barrow	Reilly Developments Ltd	9	0	9	3	3	3	0	0	0	0	0	0	0	0
Elbow Wood Drive, Barrow (Hansons)	Morris Homes	43	8	35	7	7	7	7	7	0	0	0	0	0	0
1-7 Whitethorne Fold, Barrow	Millbrook Developments	7	4	3	3	0	0	0	0	0	0	0	0	0	0
Land off Dale View, Billington		49	34	15	0	0	0	0	0	3	3	3	3	3	0
Hare Hill Croft, Chatburn	J-J Holmes (NW) LLP	10	3	7	1	1	1	2	2	0	0	0	0	0	0

Coplow View, Clitheroe (Clitheroe Hospital)	McDermott Homes	60	0	60	30	30	0	0	0	0	0	0	0	0	0
Appleby Square (Henthorn Road) Clitheroe	Story Homes	130	65	65	37	28	0	0	0	0	0	0	0	0	0
Berkeley Square, Clitheroe (Milton Avenue) - Manor Place	Morris Homes	40	14	26	10	10	6	0	0	0	0	0	0	0	0
Sycamore Walk, Clitheroe	Beck Homes Ltd	17	4	13	3	3	3	3	1	0	0	0	0	0	0
Alexandra Close, Clitheroe - Primrose	Prospect Homes	81	15	66	51	15	0	0	0	0	0	0	0	0	0

Fox Hall Drive, Hurst Green (Land Whalley Road)	Hillcrest Homes	31	0	31	31	0	0	0	0	0	0	0	0	0	0
Land at Chapel Hill, Longridge	The Blackmore Group	53	0	53	40	13	0	0	0	0	0	0	0	0	0
Alston Meadow, Longridge (Preston Road)	Kier Living	256	0	256	15	30	30	30	30	30	30	30	31	0	0
Mitton Road, Whalley	David Wilson Homes	139	91	48	30	18	0	0	0	0	0	0	0	0	0
Cherry Drive, Brockhall Village		7	6	1	0	0	0	0	1	0	0	0	0	0	0

Eden Gardens, Brockhall Village		6	3	3	0	0	0	0	3	0	0	0	0	0	0
Hillside, Brockhall Village		3	2	1	0	0	0	0	1	0	0	0	0	0	0
Meadow View, Read	Westby Homes Ltd	18	11	7	7	0	0	0	0	0	0	0	0	0	0
The Moorcock Inn, Slaidburn Road, Waddington	Pendle View Developments Ltd	4	0	4	1	1	1	1	0	0	0	0	0	0	0
Little Dudlands Farm, Rimington		2	0	2	0	1	0	0	1	0	0	0	0	0	0
Small Sites with Full Planning Permission (Less than 0.4 ha)		79	0	77*	15	15	15	16	16	0	0	0	0	0	0

Small Sites with Outline Permission (Less than 0.4ha)	8	0	8	0	0	0	0	0	0	2	2	2	2	0
Small Sites Development Commenced (Less than 0.4ha)	79	0	76**	15	15	15	15	16	0	0	0	0	0	0
Small Sites Conversions Not Started	78	0	78	15	15	16	16	16	0	0	0	0	0	0
Small Sites Conversions Started	76	0	69***	14	14	14	14	13	0	0	0	0	0	0
TOTAL				512	559	510	486	398	259	175	175	157	58	532

• No. of Dwellings to be delivered over the Plan Period = 3289

• No. of Dwellings to be delivered beyond the Plan Period = 532

APPENDIX A

Name of Site	Notes NB: SOCG - Statement of Common Ground
Land East of Clitheroe Road, Whalley (Lawsonsteads)	No contribution from this development to 5 yr supply as Redrow who originally submitted the Reserved Matters application no longer wish to develop the site. However, evidence from Trafford Housing Trust (THT) in form of signed SOCG that they intend to develop the site (refer to pg. 25 of 'Evidence of Delivery'). They expect all dwellings to be delivered in the plan period. Thus applied 160 ÷ 45 for remaining years. Also note that an appn. has been submitted by THT for 188 dwellings (3/2018/0914).
Land to south-west of Barrow & west of Whalley Road, Barrow (Parcel B)	E-mail received from Taylor Wimpey and David Wilson Homes 15/11/2018 which outlines expected delivery. Refer to pg. 9 of document 'Evidence of Delivery'.
Land at Accrington Road, Whalley	All dwellings expected to be delivered within 5 yrs.
74 Higher Road, Longridge	Outline permission granted at Appeal 22/05/2018 (Appeal Ref. APP/T2350/W/17/3186969). Not included any dwellings within the 5 yr supply. However would expect site to deliver in Yr 6 onwards.
Higher Standen Farm - 2nd Phase	Delivery is based upon signed SOCG dated 15/11/2018. Discussions are taking place with Taylor Wimpey re. delivery of next phase. Leaves 532 dwellings to be delivered beyond the plan period. However the housing supply is not dependent on this site.
Land off Waddington Road, Clitheroe	Outline permission granted for 275 dwellings (3/2014/0597). A Reserved Matters application for 207 dwellings has been submitted to the Authority and is yet to be determined (3/2018/0181). Signed SOCG dated 15/11/2018 outlining expected delivery which has been used for this trajectory.
Land East of Chipping Lane, Longridge - Phases 2 & 3	239 dwellings are remaining to be developed on the site which was granted outline consent for 363 (3/2014/0764). Signed SOCG dated 15/11/2018 is for phases 2 & 3. These figures have been used to establish delivery for years 1-5 and 34 per year beyond the 5 yr period.
Land at Higher Standen Farm, Clitheroe (Phase 1)	Trajectory based on signed SOCG. Refer to pg. 75 of 'Evidence of Delivery'

Land to south-west of Barrow & west of Whalley Road, Barrow (Parcel A)	Trajectory based on signed SOCG. Refer to pg. 63 of 'Evidence of Delivery'
Land North of Dilworth Lane, Longridge	Trajectory based on signed SOCG. Refer to pg. 92 of 'Evidence of Delivery'
Land East of Chipping Lane, Longridge Phase 1	Trajectory based on signed SOCG. Refer to pg. 88 of 'Evidence of Delivery'
Land off Dale View, Billington	Permission granted 30/11/2018 - Works need to commence by Nov 2020.
Mills Way, Chipping	Trajectory based on e-mail from developer on 02/11/2018. Refer to pg. 12 of 'Evidence of Delivery'.
Greenfield Avenue, Clitheroe	Trajectory based on e-mail from developer on 06/11/2018. Refer to pg. 14 of 'Evidence of Delivery'.
Land off Mill Lane, Gisburn	Expect site to deliver within the next 5 years. Note that works commenced in October of this year.
Land off Longsight Road, Langho	Outline permission was granted for 18 dwellings on the site (3/2015/0010). It is noted that a Reserved Matters application has been submitted for 42 dwellings (3/2018/0392). Thus can expect delivery of 18 dwellings within the next 5 years.
Spout Farm, Preston Road, Longridge	Discharge of Conditions application for the site approved in July 2018 (3/2018/0428). Can expect delivery of the site within the next 5 years.
Land r/o Pendle Street East, Sabden	Reserved Matters application approved Dec 2018 (3/2017/0351). Can expect delivery of the site within the next 5 years.
Former Victoria Mill, Sabden	Trajectory based on e-mail from developer on 06/11/2018. Refer to pg. 20 of 'Evidence of Delivery'.
Oakhill College, Wiswell Lane, Whalley	Discharge of Conditions application approved on the site in Nov 2018 (3/2018/0491). Can expect delivery of the site within the next 5 years.
Old Row, Whalley Road, Barrow	Trajectory based on signed SOCG. Refer to pg. 32 of 'Evidence of Delivery'
Land Malt Kiln Brow, Chipping	Trajectory based on e-mail from agent on 02/11/2018. Refer to pg. 37 of 'Evidence of Delivery'.
Land at Chatburn Road, Clitheroe	Trajectory based on e-mail from developer on 09/11/2018. Refer to pg. 38 of 'Evidence of Delivery'. Also note an application has been approved on the site for 30 dwellings (3/2017/0653) post the base date. Only 23 dwellings accounted for in 5 year supply and trajectory.

Land off Henthorn Road, Clitheroe	Trajectory based on signed SOCG. Refer to pg. 39 of 'Evidence of Delivery'
Land Whalley Road, Mellor Brook	Would expect delivery of the site within the next 5 years.
Land Worthalls Farm, Westfield Avenue, Read	Would expect delivery of the site within the next 5 years.
1-9 Stonewater Close, Barrow	Works commenced 05/03/2018. Can expect delivery of the site within the next 5 years.
Elbow Wood Drive, Barrow (Hansons)	Works have commenced and 8 completions on site as of 30/09/2018. Can expect delivery of the site within the next 5 years.
1-7 Whitethorne Fold, Barrow	Works have commenced and 4 completions on site as of 30/09/2018. Can expect delivery of the site within the next 5 years.
Land off Dale View, Billington	34 completions on the site. Works have stalled thus no delivery within the next 5 years. However a developer has confirmed to the Authority that they are interested in developing the site. Thus an average of the remaining 15 to be developed has been taken over the next 5 years.
Hare Hill Croft, Chatburn	Works have commenced and 3 completions on site as of 30/09/2018. Can expect delivery of the site within the next 5 years.
Coplow View, Clitheroe (Clitheroe Hospital)	Trajectory based on signed SOCG. Refer to pg. 70 of 'Evidence of Delivery'
Appleby Square (Henthorn Road) Clitheroe	Trajectory based on e-mail from developer on 09/11/2018. Refer to pg. 74 of 'Evidence of Delivery'.
Berkeley Square, Clitheroe (Milton Avenue) - Manor Place	Works have commenced and 14 completions on site as of 30/09/2018. Can expect delivery of the site within the next 5 years.
Sycamore Walk, Clitheroe	Works have commenced and 4 completions on site as of 30/09/2018. Can expect delivery of the site within the next 5 years.
Alexandra Close, Clitheroe - Primrose	Works have commenced and 15 completions on site as of 30/09/2018. Can expect delivery of the site within the next 5 years.
Fox Hall Drive, Hurst Green (Land Whalley Road)	Trajectory based on signed SOCG. Refer to pg. 83 of 'Evidence of Delivery'. Works have commenced and as of 30/09/2018 3 dwellings were under construction.
Land at Chapel Hill, Longridge	Works have commenced and 18 dwellings are under construction as of 30/09/2018. Can expect delivery of the site within the next 5 years.

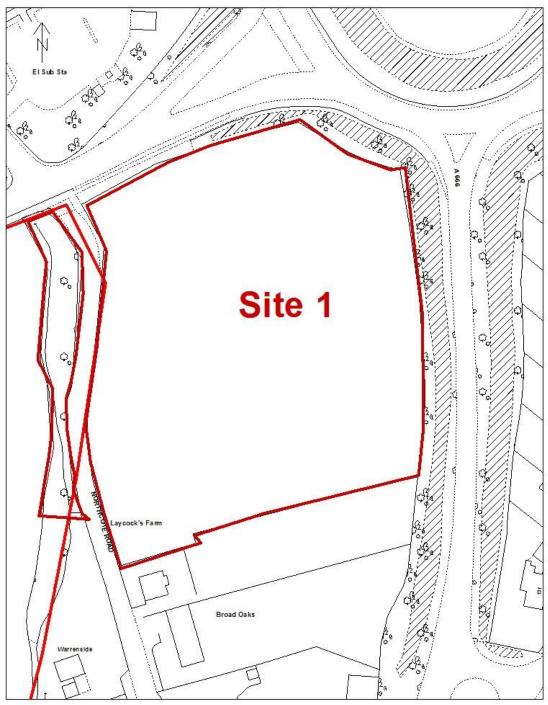
Alston Meadow, Longridge (Preston Road)	Works have commenced and 5 dwellings were under construction as of 30/09/2018. Can expect some delivery over the next 5 years.
Mitton Road, Whalley	Trajectory based on e-mail from developer on 15/11/2018. Refer to pg. 96 of 'Evidence of Delivery'.
Cherry Drive, Brockhall Village	Works commenced - Would expect delivery within the next 5 years.
Eden Gardens, Brockhall Village	Works commenced - Would expect delivery within the next 5 years.
Hillside, Brockhall Village	Works commenced - Would expect delivery within the next 5 years.
Meadow View, Read	Works have commenced and 11 completions on site as of 30/09/2018. Can expect delivery of the site within the next 5 years.
The Moorcock Inn, Slaidburn Road, Waddington	Works have commenced and 4 dwellings were under construction as of 30/09/2018. Can expect delivery of the site within the next 5 years.
Little Dudlands Farm, Rimington	Letter received from owner 23.05.2018. Stating one to be delivered in next 2 years and other will take longer.
Small Sites with Full Planning Permission (Less than 0.4 ha)	*Two dwellings taken out of 5 yr supply - Refer to pg. 15 of '5 Yr Supply Statement'.
Small Sites with Outline Permission (Less than 0.4ha)	Not included within the 5 yr supply. However would expect sites to be delivered within the plan period.
Small Sites Development Commenced (Less than 0.4ha)	**Three dwellings taken out of 5 yr supply - Refer to pg. 15 of the '5 Yr Supply Statement'.
Small Sites Conversions Not Started	All full permissions - Can expect to deliver within the next 5 years.
Small Sites Conversions Started	***Seven taken out of supply - Refer to pg.15-16 of the '5 Yr Supply Statement'.

Appendix 3 of Approach to Plan Preparation (Supp 1.39) setting out 33 sites for potential allocations derived from the HED DPD Regulation 18 Call for Sites Exercise

APPENDIX 3

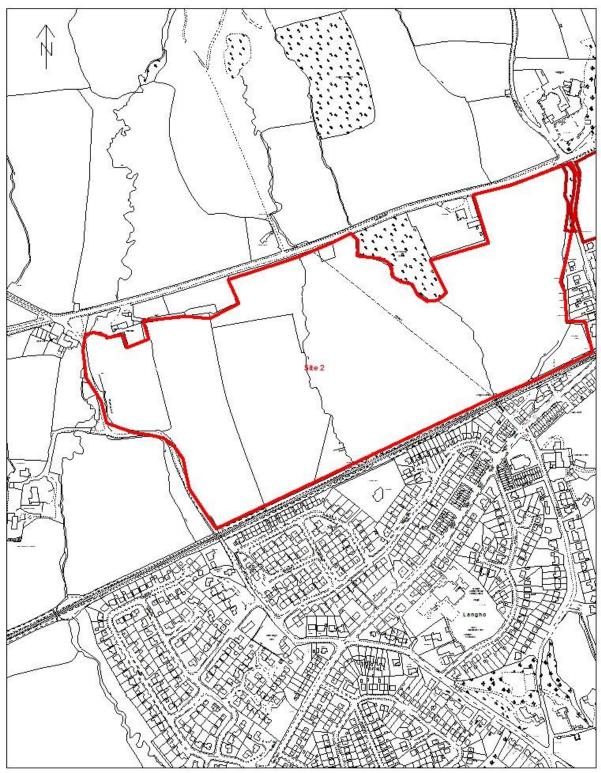
This section includes maps of the 33 'alternative' potential allocation options submitted to the Council during the 'Call for sites' exercise.

Site No	Site Location (GGP Layer Number)	Settlement	Site Area (ha)
1	Longsight Road	Langho	1.5
2	Land off Longsight Road	Langho	20.57
3	Carr Hall	Langho	52
4	Land at Highmoor	Clitheroe	N/A
5	Land S of Albany Drive	Copster Green	0
6	Land off Mellor Lane	Mellor	2.02
7	Rear of bay Horse Pub	Osbaldeston	c.0.9
8	Land at Willows Park Lane	Longridge	2.67
9	Land East of Higher College Farm	Longridge	0
10	Higher College Farm (Longridge	1.5
11	Pendleton BrookDay Centre	Clitheroe	0.47
13	Highmoor Farm	Clitheroe	5
14	Clitheroe Joint Divisional Office	Clitheroe	0.36
15	Chatburn Road	Clitheroe	3.56
15	Land w of Shays Drive	Clitheroe	1.9
16	Former Clitheroe Community Hospital site	Clitheroe	2.1
17	Chatburn Old Road	Chatburn	2.4
18	Land N of Ribblesdale View	Chatburn	0.7
19	Land adjoining Heyhouses, Stubbins Lane	Sabden	0.8
20	Hammond Ground	Read	20.06
21	Land off School Lane	Simonstone	0.5
22	Calder Works	Simonstone	1.5
23	Land at Longsight Road	Copster Green	c 0.5
24	Land adjoing Haugh Head, Whins Lane	Simonstone	0.7
25	Land SE of Main Road	Gisburn	1.8
26	Land off Mitton Road	Whalley	6.9
27	Land between A59 and Clitheroe Road	Barrow	6.3
28	Land S of Whiteacre Lane	Barrow	0
29	Land W of Clitheroe Road	Barrow	N/A
30	Former Clitheroe Hospital and land SW of Chatburn Road	Clitheroe	2
31	Land W of Preston Road	Longridge	18.9
32	Land associated with Wilpshire Golf Club	Wilpshire	0.38 and 2.47
33	Houlkers Farm	Read	7.95



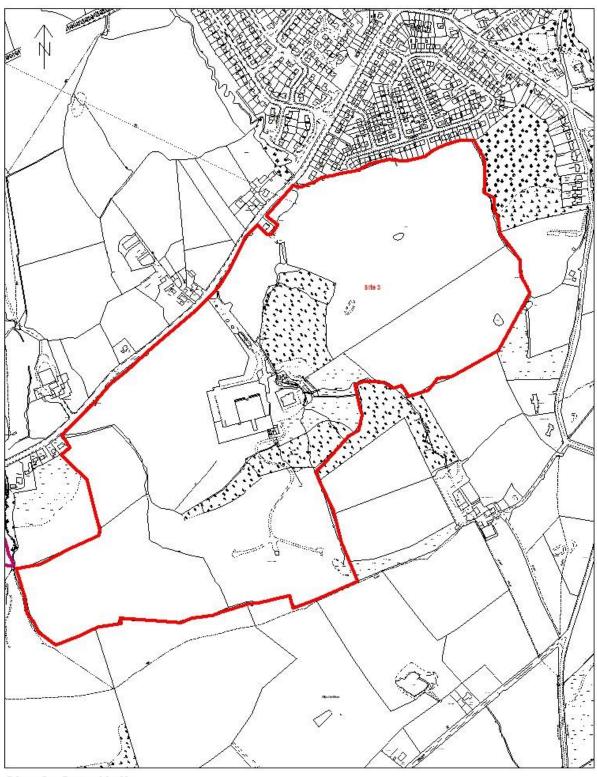
Site 1: Longsight Rd, Langho

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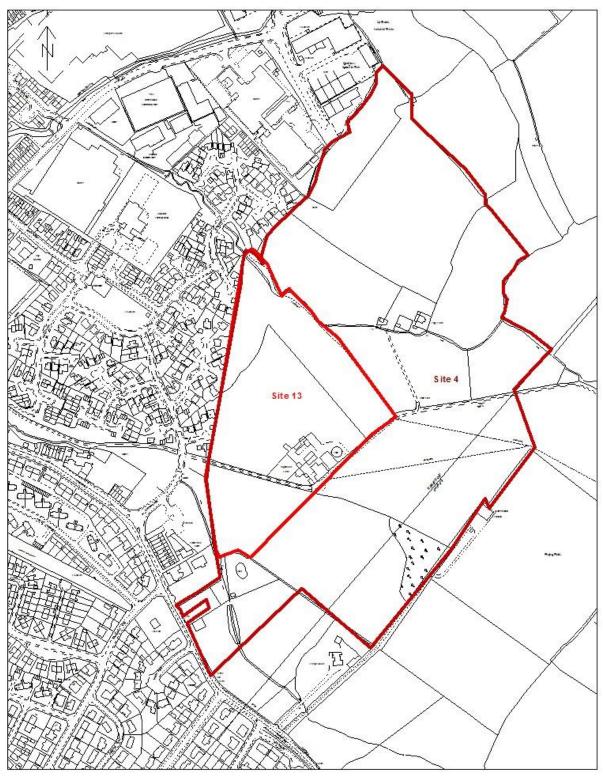
Site 2: Longsight Rd, Langho

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Site 3: Carr Hall

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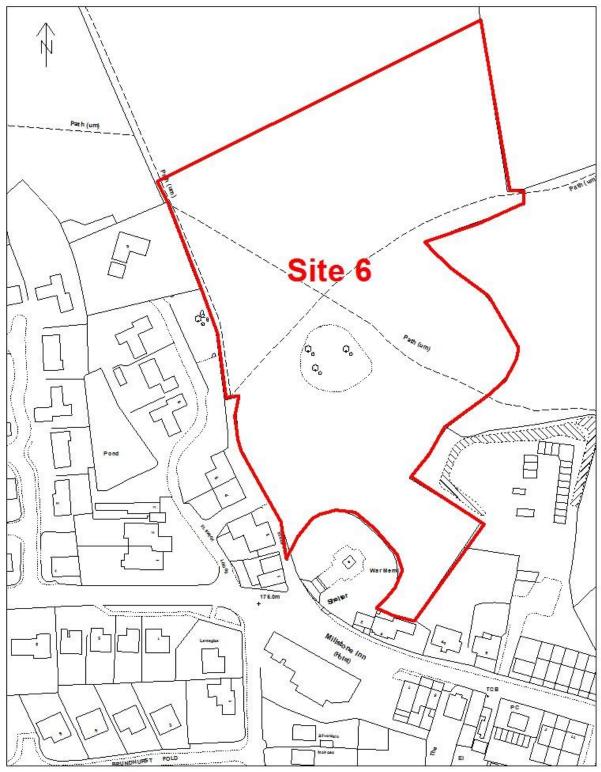
Site 4:Land at Highmoor

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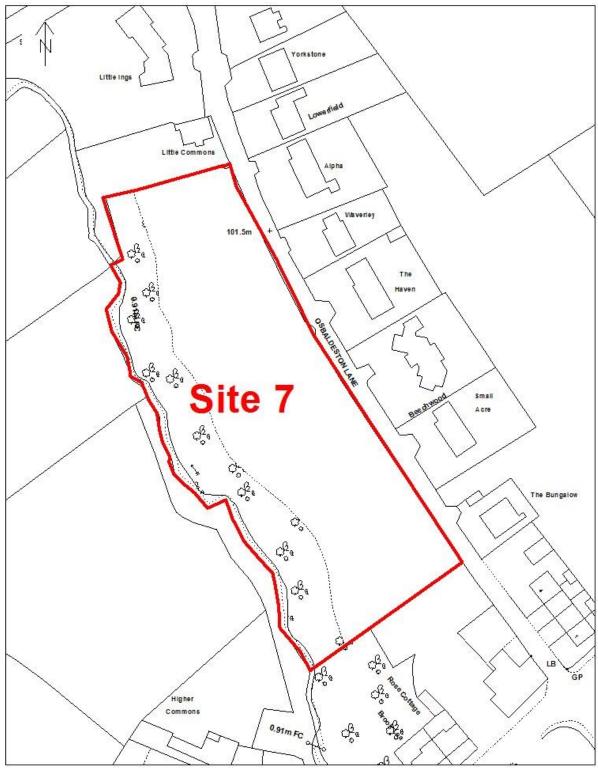
Site 5: S. of Albany Drive

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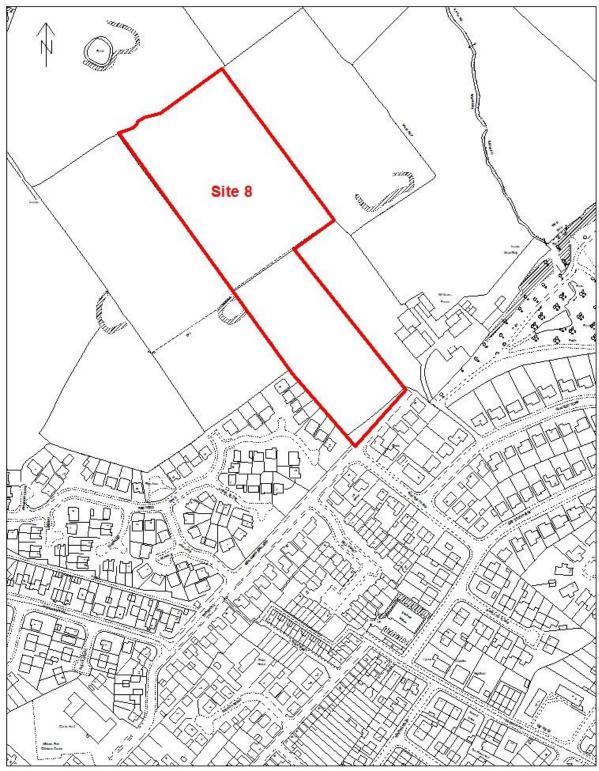
Site 6: Mellor Lane, Mellor

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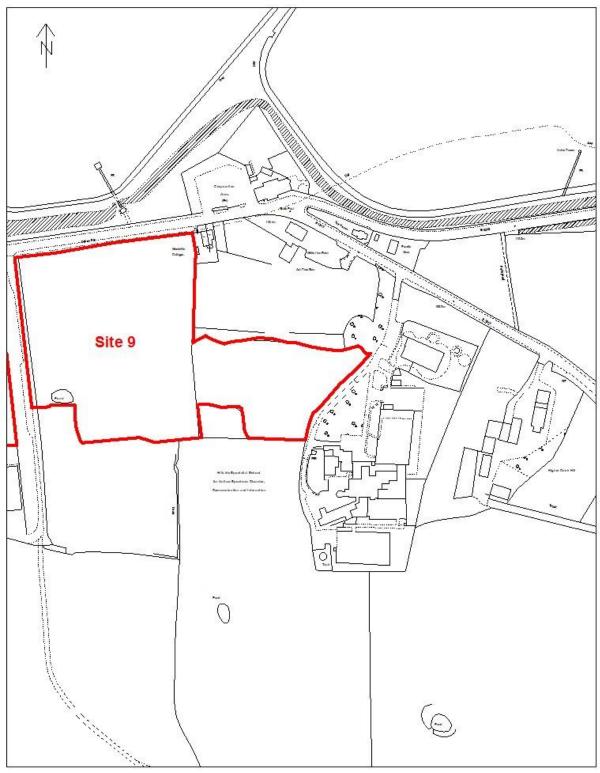
Site 7:Rear Bay Horse,Osblstn

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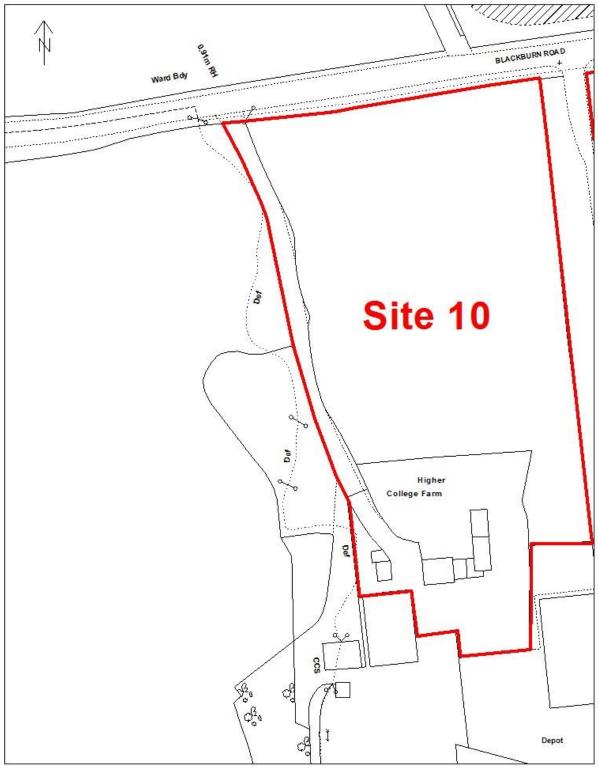
Site 8: Willows Prk Lane, Lnrdg

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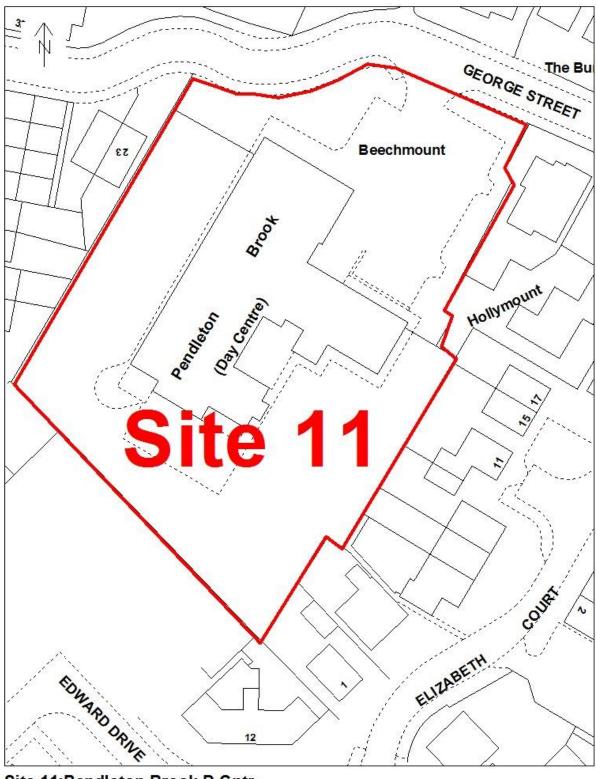
Site 9: East Higher College Fm

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Site 10: Higher College Farm

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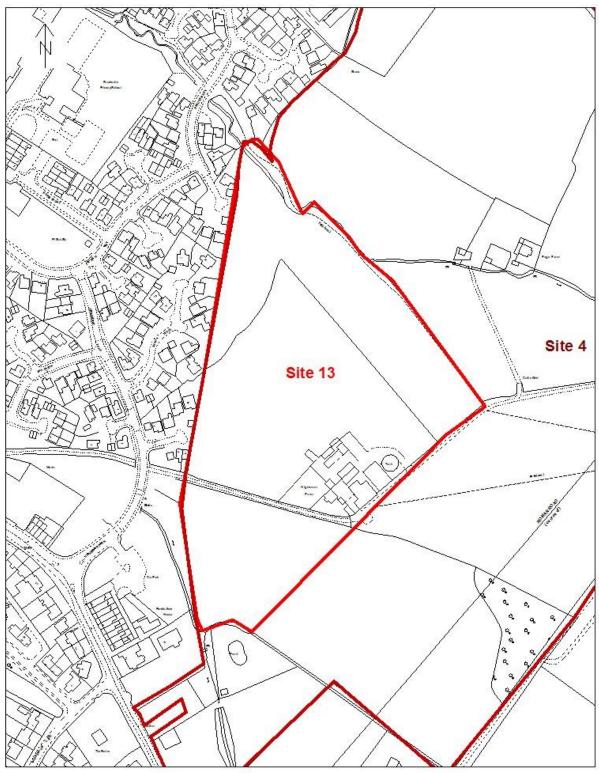
Site 11:Pendleton Brook D Cntr

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Site 12: West Shays Drive

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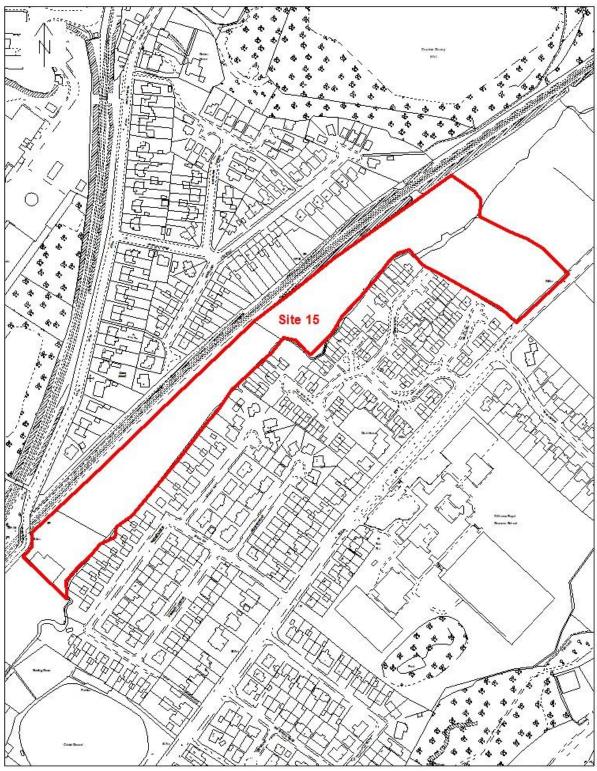
Site 13: Highmoor Farm

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Site 14: C Joint Divisonal Off

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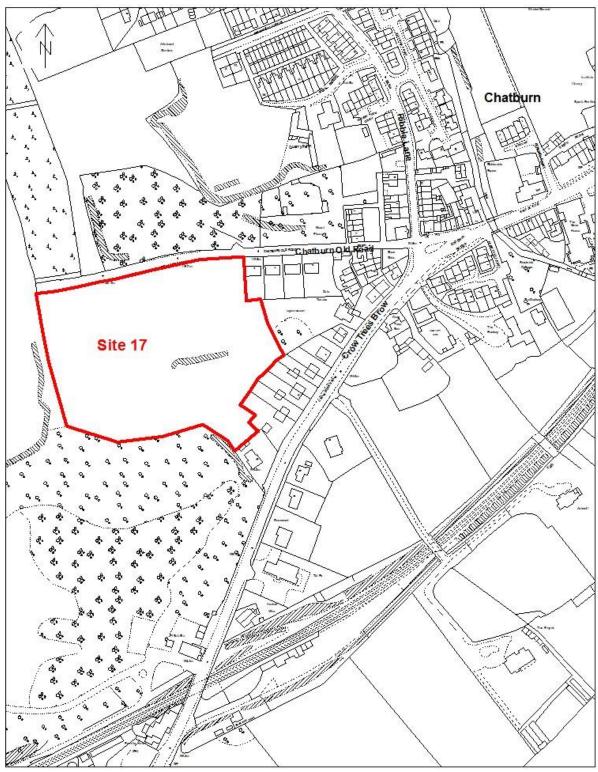
Site 15: Chatburn Rd

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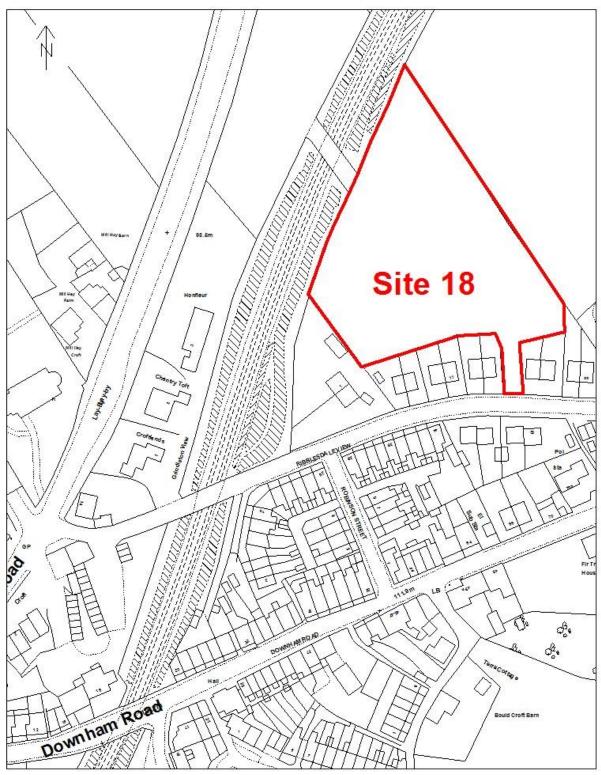
Site16&30 Clitheroe Hospital

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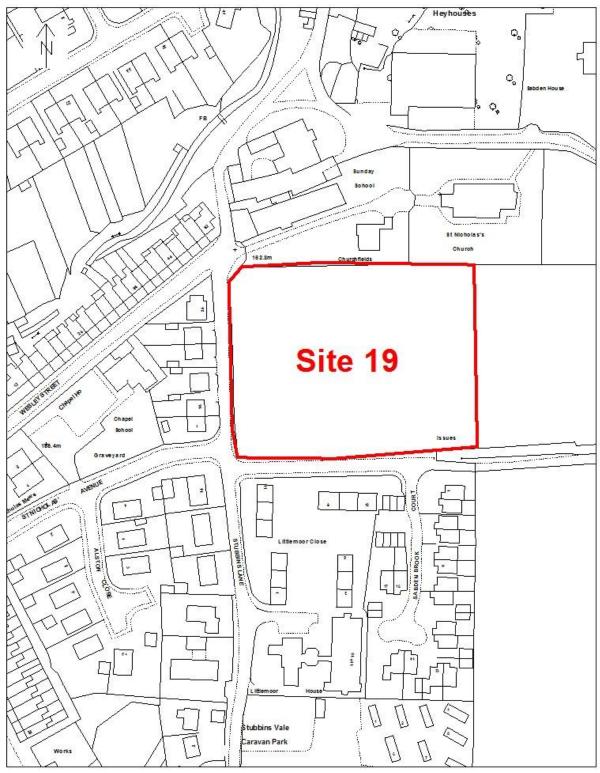
Site 17: Chatburn Old Road

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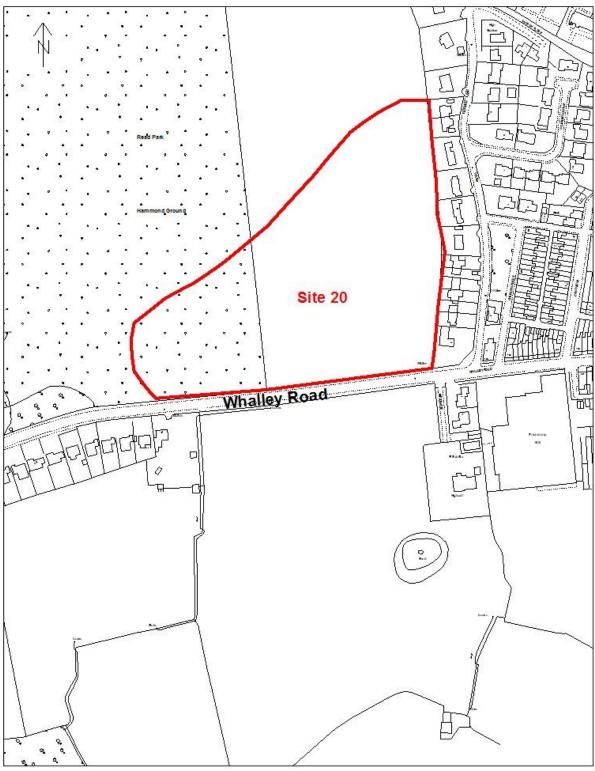
Site 18:N. of Ribblesdale View

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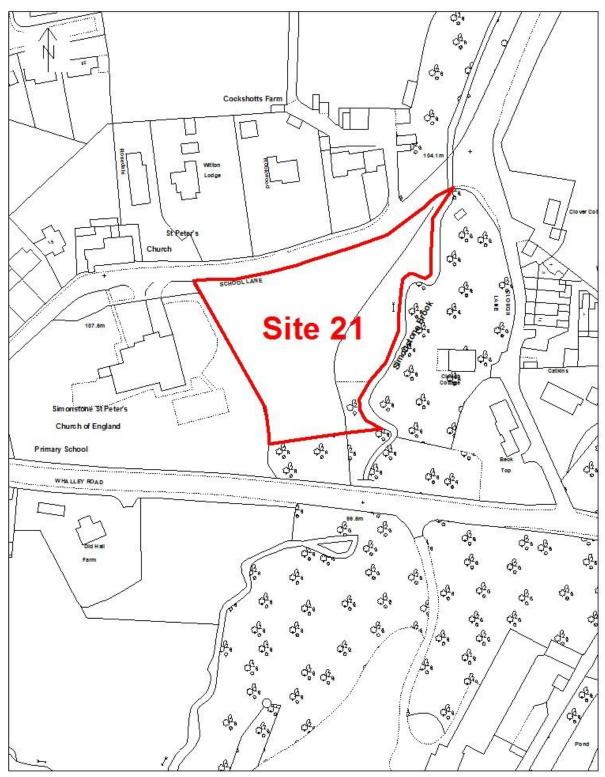
Site 19:Stubbins Lane

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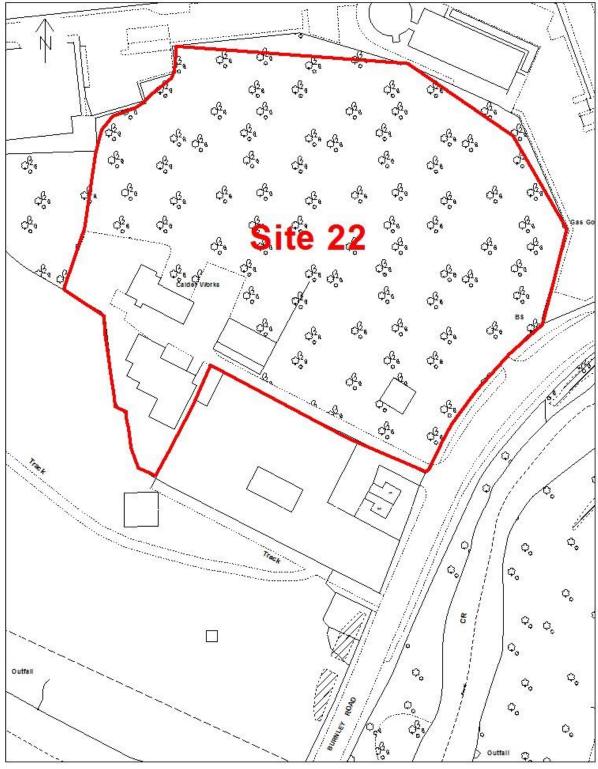
Site 20: Hammond Ground

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Site 21: School Lane

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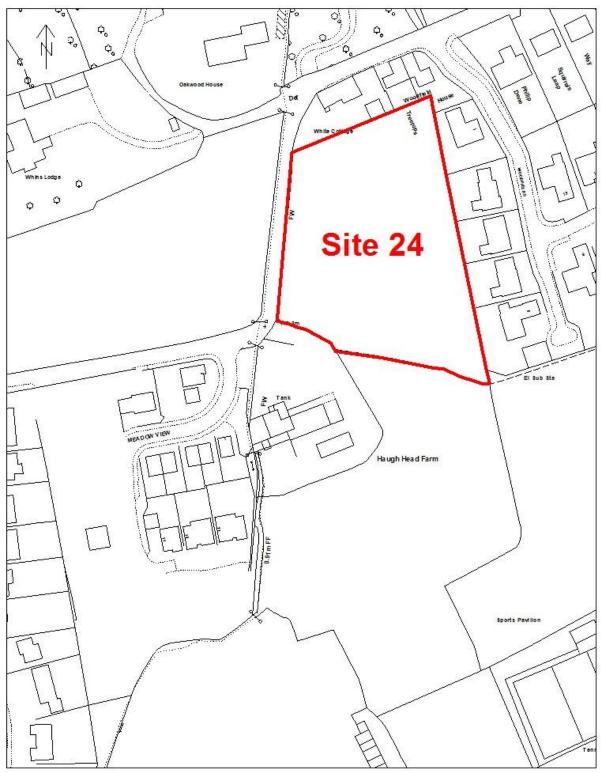
Site 22: Calder Wrks, Simnston

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Site 23:Longsight Rd

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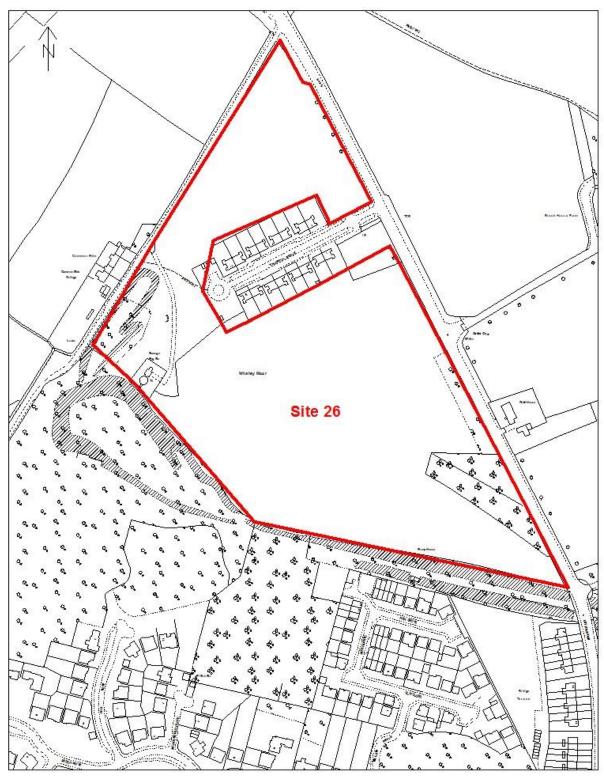
Site 24: Adj Haugh Head WhinsL

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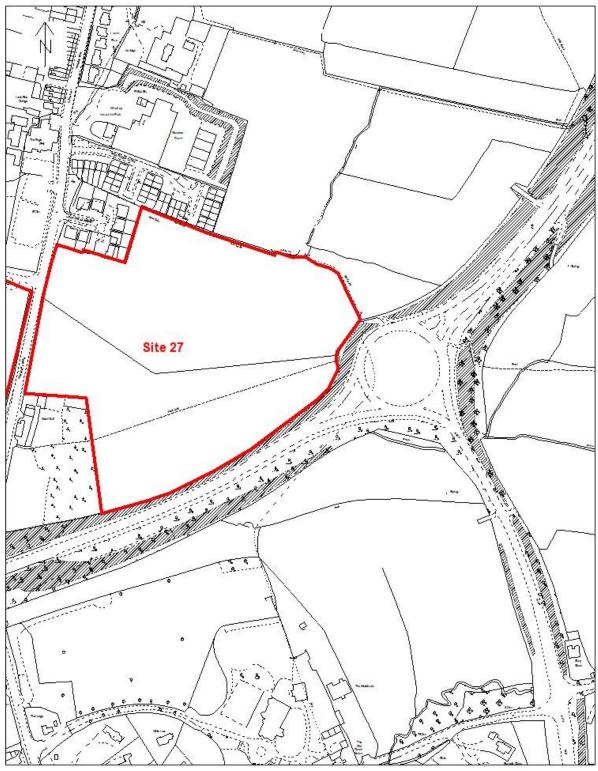
Site 25:SE of Main Rd, Gisburn

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Site 26:Mitton Rd Whalley

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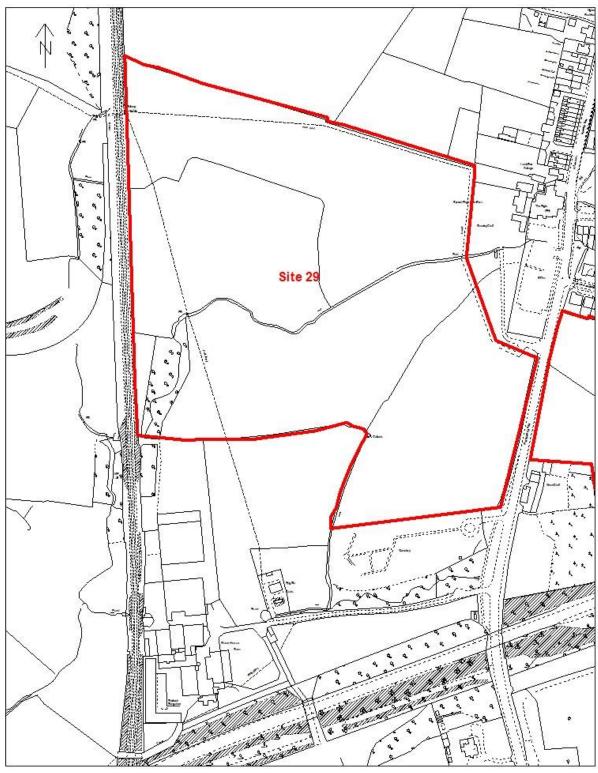
Site 27:Btwn A59 & Clitheroe Rd

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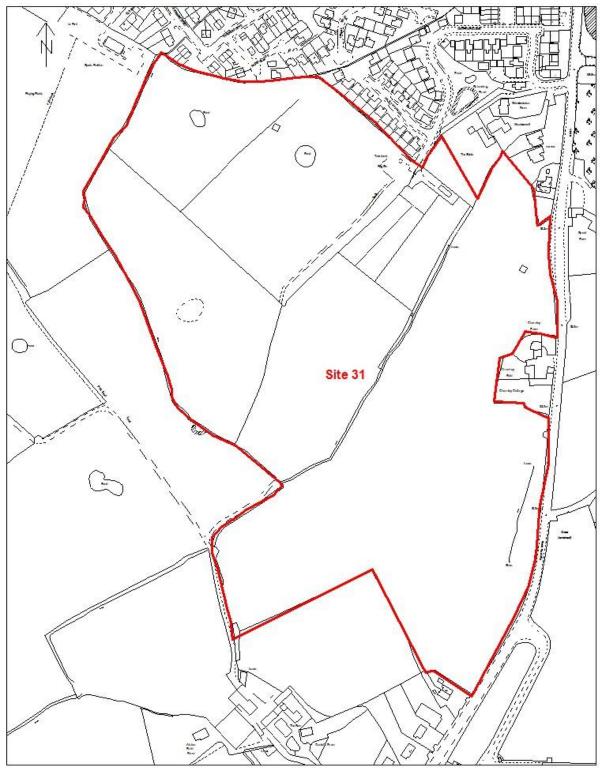
Site 28:Whiteacre Lane Barrow

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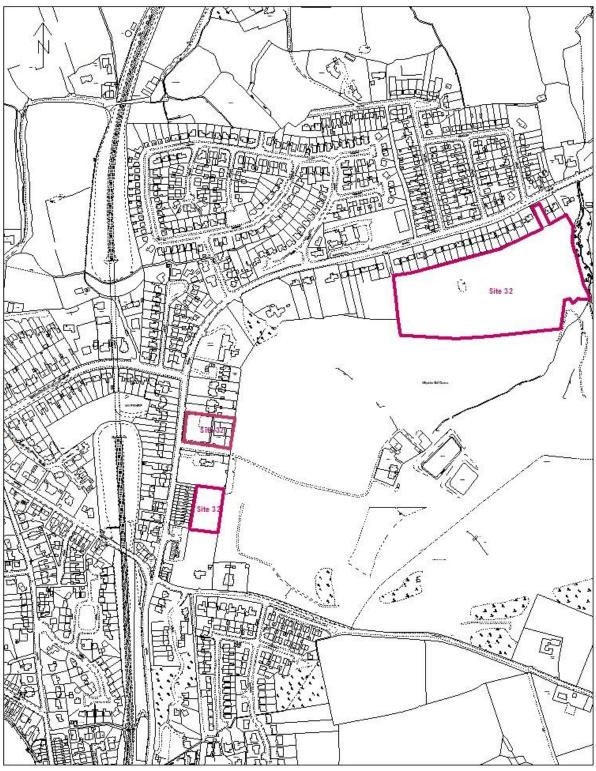
Site 29: W.of Clitheroe Rd Brw

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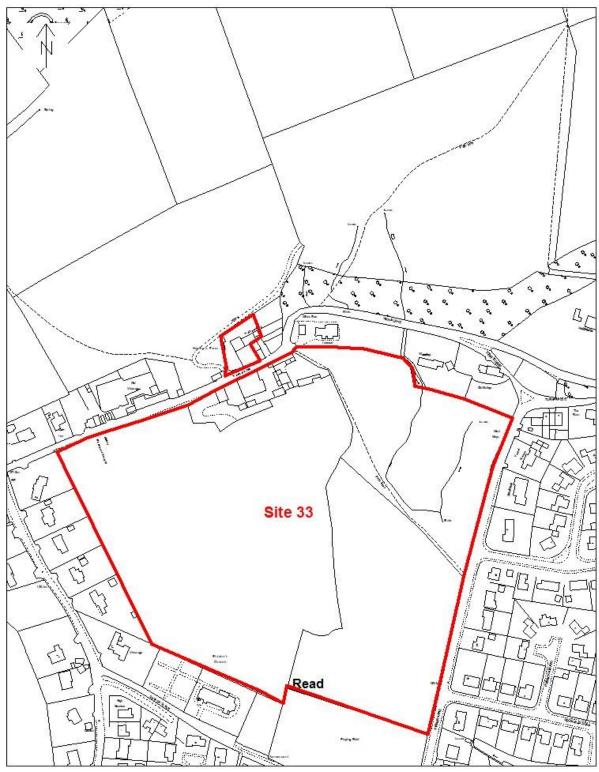
Site 31:W of Preston Rd, Lngrd

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Site 32: Wilpshire Golf Club

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Site 33:Houlkers Farm

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10. RESPONSE TO SPORT ENGLAND CONSULTATION RESPONSE ADDITIONAL STATEMENT RE OS1 SECTION 5 PAGE 19 OF 25TH OCTOBER 2018 REGARDING HED DPD OPEN SPACE ISSUES

- 10.1 Our approach to Open Space issues was laid out in the Open Space and Sport and Recreation Provision Topic paper (Supp 1.22) which was presented as an evidence base document at the Regulation 18 stage of the HED DPD's development together with the Lancashire Sport Partnership Ribble Valley Facilities Review evidence base document. These were subsequently augmented by a Playing Pitch Audit in 2015.
- 10.2 Sport England (SE) maintain that the substance of their continued objection is that the Council's evidence base underpinning proposed Policy OS 1 is not robust.
- 10.3 Policy OS1, which seeks to protect existing open spaces, not to allocate new ones, and to extend, through a minor modification such protections already given in established Core Strategy policy (DMB4) to open space sites within defined settlement boundaries those sites outside the defined settlement boundaries.
- 10.4 The SE response also seems to focus only on a subset of open space sites as defined in the Topic Paper, ie sport and recreation pitches. In terms of the evidence base they consider that the 2013 Lancashire Sport partnership (LSP) Ribble Valley Facilities Review (Supp 1.20) not to be a sufficiently empirical and robust demand prediction and suggest that there might be a need for more facilities and the quality of existing facilities may be insufficient to sustain current and future levels of play. The document was a initially prepared for the Core Strategy and was found adequate in its EIP and as an underpinning for Policy DMB4. It has also been included as part of evidence prepared for the HED DPD as it supports the protections of those open space sites outside the settlement boundaries and has been placed again was in the public domain for SE to comment on.
- 10.5 SE suggest that they have their guidance has not been applied. Planning Practice Guidance (PPG) refers to the SE guidance on assessing need within PPG ID 37-002-20140306, specifically that "Authorities and developers may refer to Sport England guidance". Whilst PPG does not insist that SE guidance is used the LSP Facilities Review (Supp 1.20) does use elements of their guidance and was found to be sufficient for the Core Strategy policy underpinning of DMB4, the specific Open Space policy that OS1 is intended to supplement.
- 10.6 Ribble Valley have also in addition to the Facilities review sup 1.20 has also undertaken and published its own Playing Pitch Audit (Post 2.18) collected in September 2015 and formally adopted in 2017. SE maintain that such audits have a three year lifespan and as such we would consider that this evidence is both robust in detail and still current.
- 10.7 We consider that, taken together, the Facilities Review and the detailed Pitch Audit as robust and proportionate evidence bases on which to base the policy protections within OS1 as they relate to SE's specific concerns relating to playing pitches.
- 10.8 SE also focus on the Topic Paper's reference to the now superseded PPG17.
- 10.9 The topic paper makes it quite clear in Section 2 that it does not apply PPG17 policy, which it recognises as now defunct and replaced by NPPF. The general positions quoted from the document under PPG17 Guidance do not contradict the general NPPF stances on the protection of playing pitches. More specifically it is the typology within the PPG17's associated Companion Guide that was considered

particularly useful in the absence of more detailed definitions of Open Space in NPPF and current PPG. The relevant current PPG section headed Open Space, Sports and Recreation Facilities...etc Section 1 does not offer a fully defined description of Open Space but rather this statement,

"Open space, which includes all open space of public value, can take many forms, from formal sports pitches in open areas within a development, linear corridors and country parks"

10.11 In seeking to define and protect the totality of open spaces and recreation facilities in Ribble valley the typology in the PPG 17 Companion Guide was considered to offer a more detailed, sensible and pragmatic guide to the many different kinds of sites that are open and to which the public have access.