

# Appendix 3: Consultation Paper 3

## (Site Allocations DPD – Scoping and Site Assessment Methodology)

Comments and proposed Council response

**Q3.a) Do you think the Council has identified all the key topics which policies in a Site Allocations DPD should cover (see Scoping Assessment at paragraphs 1.3-1.5). If you have answered No, please tell us what other topics the Site Allocations DPD should include:**

Rep I	Name / Organisation	Key topics covered	Other topics for Site Allocations DPD to include	Council response	Council Notes
399	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Not Stated	This needs to either make it clear that the GI network includes the ecological network, or preferably identify the ecological network separately.	Noted	Section 4.7 of the report states that the GI network will be informed by a number of information sources which include ecological matters e.g. existing environmental networks and designations identified in the DM DPD (policy DM18) and accompanying maps, open spaces, water bodies, water courses and the planned habitat survey work.
406	Matthew Pardoe WYG	No	Support is given to the general approach. However, when stating that any anomalies between Green Belt or Countryside Area and the urban boundary will be addressed it should be clarified that this will consider existing development (which is not always the case) and a site's functionality with respect to Green Belt policy aspirations. In certain instances, these have not been robustly addressed, with consideration instead being given to apparent cartographic coalescence rather than the situation on the ground. For instance, there are a number of cases where existing built-form and access arrangements have not been ignored, which potentially would affect development coming forward in a due and proper manner.	Noted	General support noted. Anomalies between Green Belt/Countryside areas and urban boundary relate to a few specific instances which the SA DPD will seek to rectify. More central decisions relating to release of Green Belt or Countryside area will be taken as the spatial strategy develops and growth options are determined. The Green Belt Assessment will be a key piece of informative evidence.

**Q3.a) Do you think the Council has identified all the key topics which policies in a Site Allocations DPD should cover (see Scoping Assessment at paragraphs 1.3-1.5). If you have answered No, please tell us what other topics the Site Allocations DPD should include:**

Rep I	Name / Organisation	Key topics covered	Other topics for Site Allocations DPD to include	Council response	Council Notes
420	Warren Hilton Highways England	Not Stated	<p>A number of studies have been completed which form an evidence base to inform the issues which the Site Allocations DPD will address. However, a number of further studies, largely non-transport related, still need to be completed. We would welcome the opportunity to work with the Council to assist the further development of the transport evidence base informing the Local Plan. Highways England also notes that the Council is currently seeking to develop policies in the Site Allocations DPD around the following issues:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> General – a review of the urban boundary across the Borough;</li> <li><input type="checkbox"/> Economic – identification of employment land, retail hierarchies and town centre boundaries;</li> <li><input type="checkbox"/> Housing – identification of housing land allocations;</li> <li><input type="checkbox"/> Infrastructure – identification, allocation and safeguarding of land for new infrastructure, and the identification of existing green infrastructure; and</li> <li><input type="checkbox"/> Other – identification of habitats, local landscapes, food-growing spaces and wind generation areas of search.</li> </ul> <p>Highways England welcomes the development of these policies, especially the policies relating to infrastructure development which is stated will be evidenced through an Infrastructure Delivery Plan (IDP). The Local Plan stages provide the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Highways England would welcome the opportunity to work with the Council in the development of these policies and the IDP to ensure development comes forward in a sustainable manner and that alternative sustainable transport options are made available in the right place and the right time to cater for local trips.</p>	Noted	The Council will continue to work with the Highways Agency to ensure the plan reflects sustainability principles.
429	Wallace Barnett	Yes	none	Noted	Support noted

**Q3.a) Do you think the Council has identified all the key topics which policies in a Site Allocations DPD should cover (see Scoping Assessment at paragraphs 1.3-1.5). If you have answered No, please tell us what other topics the Site Allocations DPD should include:**

Rep I	Name / Organisation	Key topics covered	Other topics for Site Allocations DPD to include	Council response	Council Notes
440	Liz Locke Environment Agency	No	<p>Stage 2 – Site Screening: Pg 9. Location – We would wish to see included here a consideration of the Sequential Test, and thus remove sites that are:-</p> <ul style="list-style-type: none"> <li>•Located within areas of high flood risk – In accordance with the NPPF, following the sequential approach, sites for residential development that lie within Flood Zone 3a will not normally be considered. However, if there are no other suitable and available sites in areas of lower probability of flooding, sites for residential development may be considered in FZ3a, providing they can fulfil the Exception Test.</li> </ul> <p>Pg.9 Availability- We note the assumption that sites already with full planning permission should be removed from screening, as it will be assumed that should planning permission lapse the permission would be granted again. However, we consider that this assumption should not apply to any sites already benefitting from planning permission that are located in areas identified at high risk of flooding (flood zone 3). Such sites should not be automatically screened out of the assessment process, thus allowing for a re-assessment on flood risk grounds, reviewing the Sequential Test for the site, and taking into account any updated flood risk data and modelling, and the revised climate change allowances.</p>	Further consideration required	<p>Comments relate to Site Assessment Methodology Stage 2 - Site Screening.</p> <ul style="list-style-type: none"> <li>-additional criterion to exclude residential sites in Flood Zone 3a;</li> <li>-sites with planning permission can be implemented without the need for Site Assessment Methodology. Matters are considered in detail at the planning application stage including flood risks matters where relevant. Should the permission lapse, any new proposals would be considered in the light of up to date information on flood risk where appropriate.</li> </ul>

**Q3.a) Do you think the Council has identified all the key topics which policies in a Site Allocations DPD should cover (see Scoping Assessment at paragraphs 1.3-1.5). If you have answered No, please tell us what other topics the Site Allocations DPD should include:**

Rep I	Name / Organisation	Key topics covered	Other topics for Site Allocations DPD to include	Council response	Council Notes
459	Nick Lee NJL Consulting	No	<p>It is critical a Site Allocations DPD covers the policies included in paragraphs 1.3 to 1.5 BUT policy should recognise that growth in relation to housing and employment are intrinsically linked to one another.</p> <p>Consideration of the provision of appropriate complementary services and facilities including convenience and comparison retail floorspace, opportunities for food and drink, and opportunities to promote health and fitness for individuals, are also crucial to this planned growth and can impact positively in a wider context.</p> <p>The promotion of employment areas including those along growth corridors needs to consider also the diversity of uses to support those who live and/or work within the vicinity. The rise of leisure opportunities including food and drink, promoting health and fitness are all factors we consider fundamental to including within Hyndburn's emerging policy framework to in turn promote the Borough.</p> <p>Since housing is intrinsically linked to employment growth and vice versa, and each is dependent on additional services and facilities being accommodated, we suggest Hyndburn Council explores an opportunity within its methodology of allocations to look at the wider context of its allocations. We promote a 'bigger picture' approach to the Local Plan Fundamentally, the Council (and developers) should seek an approach whereby housing, employment and/or complementary facilities sit in locations which are in close proximity to one another and contribute to each other's success.</p>	Noted	The Council recognises that housing and economic growth are intrinsically linked and that a range of services is necessary to support sustainable patterns of development. The overall strategy (i.e. "bigger picture" will be determined through review of the Core Strategy and the SA DPD will identify sites to meet the overall aims through a variety of designations and allocations. The plan making process will be complemented by a parallel process of Sustainability Appraisal.
466	Darragh McAdam Stephen Ward Town Planning & Development Consultants Ltd	Yes		Noted	

**Q3.a) Do you think the Council has identified all the key topics which policies in a Site Allocations DPD should cover (see Scoping Assessment at paragraphs 1.3-1.5). If you have answered No, please tell us what other topics the Site Allocations DPD should include:**

Rep I	Name / Organisation	Key topics covered	Other topics for Site Allocations DPD to include	Council response	Council Notes
491	Helen Ledger Sport England	Not Stated	<p>Paper three - site allocations scoping and site methodology</p> <p>Para 1.5 - a future site allocations policy should consider playing fields and sports facilities in terms of restraint, and/or have related policies to ensure their replacement if required as set out in NPPF para 74. This could fit into the issues under Infrastructure or general. Playing fields typically are part of the GI network however their formal use for pitch based sport needs to be recognised and protected. Linked to this is the requirement for an up to date and robust assessment for playing fields, known as a playing pitch strategy and for indoor sport, known as a Built facilities strategy. I would recommend the plan is supported by relevant evidence base material if it isn't already (playing pitch strategy and built sports facilities strategy) for the local plan, both in assessing the site for development potential (e.g. have they had playing pitches on now or ever) and also to help channel investment (S106/CIL) into sporting infrastructure.</p> <p>Link to SE website: <a href="https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/">https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</a></p> <p>This understanding of any current or previous sporting use if relevant will also assist at the next stage of site selection at stage 3 - detailed appraisal para 3.11 onwards.</p> <p>Para 4.7 - see previous reference to playing fields above. Although playing fields can form part of a GI network their use for formal sport should be protected and requirements for necessary ancillary development, like changing rooms, not restricted. However including playing fields in the GI network could afford them more protection from detrimental development.</p>	Agree - no change	the Council intends to undertake an up to date assessment of playing fields and indoor sport facilities as part of the evidence base for the CSR and SA DPD. Appropriate protection will be provided through plan designations with inclusion in the GI network where relevant.

**Q3.a) Do you think the Council has identified all the key topics which policies in a Site Allocations DPD should cover (see Scoping Assessment at paragraphs 1.3-1.5). If you have answered No, please tell us what other topics the Site Allocations DPD should include:**

Rep I	Name / Organisation	Key topics covered	Other topics for Site Allocations DPD to include	Council response	Council Notes
500	Daniel Hughes PWA Planning	Yes	Support for the topics included under these respective paragraphs can be found. In particular the desire to deal with anomalies of the Green Belt, but also the former Areas of Special Restraint. It is clear that the existing proposal map from 1996 is outdated and marked boundaries on such plans can be considered out of date and not a reflection of how existing communities and settlements exists, but also do not reflect the aspirations set out in this consultation. A prime example is the site put forward as part of this submission, which includes land within both Areas of Special Restraint and Green Belt. In this instance, outline planning permission was granted in 2012 for 19 dwellings on the land within the Areas of Special Constraint, and as such, the boundaries on the aforementioned proposal map are clearly outdated.	Noted	An up to date Policies Map will be produced alongside the emerging plans to reflect new allocations and designations and the outcomes of any changes to urban and Green Belt boundaries which may arise. Former Areas of Special Restraint will be dealt with through the SA DPD and will be considered in accordance with the Green Belt assessment.
516	Stuart Booth JWPC Ltd	Yes		Noted	

**Q3.a) Do you think the Council has identified all the key topics which policies in a Site Allocations DPD should cover (see Scoping Assessment at paragraphs 1.3-1.5). If you have answered No, please tell us what other topics the Site Allocations DPD should include:**

Rep I	Name / Organisation	Key topics covered	Other topics for Site Allocations DPD to include	Council response	Council Notes
524	Tim Bettany-Simmons Canal and River Trust	No	Heritage and Ecology would both appear to be absent from the list of topics that should form part of the assessment. We also consider that 'green infrastructure' should be expanded to include 'blue and green infrastructure'	Agree - no change	Heritage and ecology matters are covered in the adopted Core Strategy, DM DPD and designations shown on the accompanying policies map (and criteria 3A.9-3A.12 of the draft Site Assessment Methodology). Section 4.7 of the report states that the GI network will be informed by a number of information sources which includes ecological matters e.g. existing environmental networks and designations identified in the DM DPD and accompanying maps, open spaces, water bodies, water courses and the planned habitat survey work. The Open Space Study (to be undertaken) will consider areas of water which are important opportunities for sport and recreation and contribute to visual amenity.
532	Judith Douglas Judith Douglas Town Planning Limited	Yes	-	Noted	Reference to deliverability is noted. Comments also relate to the role of Great Harwood in the spatial strategy.



**Q3.b) Do you think the proposed site assessment methodology at Section 3.0 and at Appendix A is an appropriate way to ensure all sites are considered in a consistent way? Please tell us if you think the methodology could be improved in any way:**

Rep ID	Name / Organisation	Appropriate?	Methodology improvements	Council response	Council Notes
407	Matthew Pardoe WYG	Yes	The factors identified are supported as they should allow the merits of most sites to be considered. Care should be taken not to widen the locational categories to include (for instance) Green Belt, as all too often a site will be screen-out of an assessment due to its designation without its sustainability or contribution to various policy aspirations being considered.	Noted	support and comments noted
412	Emily Hrycan Historic England - NW Office	Not Stated	<p>In terms of the historic environment, we would broadly support the proposed methodology for site assessments. The only comment we would make refers to Detailed Appraisal 3A.9 (heritage assets). There may be some sites which offer the potential to enhance the significance of a heritage asset (such as, for example, bringing back into use a vacant historic building or enhancing an area which detracts from the character or appearance of one of the Borough's Conservation Areas).</p> <p>Consequently, an additional Outcome ought to be added to Detailed Appraisal 3A.9 where a site has the potential to enhance or better reveal the significance of a heritage asset.</p> <p>· For many sites which could impact upon the historic environment, determining whether or not any harm would be capable of effective mitigation is likely to require a more detailed assessment of the contribution which the site makes to the significance of nearby heritage assets. Historic England has published some detailed guidance on this area of work (The Historic Environment and Site Allocations in Local Plans) which sets out a possible approach which you may find appropriate. This document can be download from our website at:- <a href="https://historicengland.org.uk/images-books/publications/historicenvironment-and-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historicenvironment-and-site-allocations-in-local-plans/</a></p>	Agree - minor modification	<p>Amend criterion 3A.9 to reflect comment. Associated para. 3.18 of explanatory text to the Site Assessment Methodology to be amended to reflect the circumstances where positive outcomes are acheived.</p> <p>Reference to guidance noted.</p>
414	Natural England	Not Stated	We do not have any detailed comments to make on this document, we note however that water quality has not been included within the environmental factors and advise that this should be included within the assessment.	Further consideration required	Consideration to be given to inclusion of criterion relating to water quality
430	Wallace Barnett	Yes	It appears to be quite comprehensive and "fair".	Noted	none

**Q3.b) Do you think the proposed site assessment methodology at Section 3.0 and at Appendix A is an appropriate way to ensure all sites are considered in a consistent way? Please tell us if you think the methodology could be improved in any way:**

Rep ID	Name / Organisation	Appropriate?	Methodology improvements	Council response	Council Notes
441	Liz Locke Environment Agency	Yes	<p>Appendix A – Proposed Site Assessment Methodology Framework pg.22 3A.4 Flood Risk (Fluvial) Detailed Appraisal – This appraisal should clearly state that consideration at this stage is subject to the site first satisfying the Sequential Test in the initial screening, with a presumption against housing development in flood zone 3a.</p> <p>Suggest including an additional Assessment Factor – “Flood Risk (Other)” to allow the assessment against flood risk from non-fluvial sources (eg groundwater, surface water). Reference could be made here to assessing potential sites against the forthcoming SFRA which will identify areas of flood risk from all potential sources. Sites with a significant percentage within an area of high flood risk should be screened out.</p>	Agree - minor modification	<p>Change to wording of 3A.4 to reflect introduction of additional criterion at Stage 2: Site Screening stage (see Rep ID 440 at Q3.a)</p> <p>Include additional criterion relating to non fluvial flooding.</p>
460	Nick Lee NJL Consulting	No	<p>Since housing is intrinsically linked to employment growth and vice versa, and each is dependent on additional services and facilities being accommodated, we suggest Hyndburn Council explores an opportunity within its methodology of allocations to look at the wider context of its allocations. We promote a 'bigger picture' approach to the Local Plan. Fundamentally, the Council (and developers) should seek an approach whereby housing, employment and/or complementary facilities sit in locations which are in close proximity to one another and contribute to each other's success. As referenced in the Development Management DPD, it is generally most sustainable (promotion of linked trips etc.) to group supporting uses together rather than providing facilities in a sporadic way on individual smaller opportunity sites.</p>	Disagree - no change	<p>The comments relate to an overall plan strategy, however the proposed SAM seeks to ensure that sites considered for allocation are assessed in a consistent and transparent manner. The SAM in itself does not preclude consideration of sites for mixed uses.</p>

**Q3.b) Do you think the proposed site assessment methodology at Section 3.0 and at Appendix A is an appropriate way to ensure all sites are considered in a consistent way? Please tell us if you think the methodology could be improved in any way:**

Rep ID	Name / Organisation	Appropriate?	Methodology improvements	Council response	Council Notes
467	Darragh McAdam Stephen Ward Town Planning & Development Consultants Ltd	part agree/part disagree	There is some concern that by the time the Site Allocations DPD is prepared, that reliance on the 2016 SHLAA and ELS may result in site allocations which do not reflect up to date circumstances. The site of the abattoir and surrounding area in Great Harwood will have changed significantly since these studies were prepared, and existing historical employment / industrial areas will be further incompatible with the surrounding area.	Disagree - no change	The comments do not appear to relate specifically to the Site Assessment Methodology. The Council will ensure that up to date circumstances will be properly reflected in the Site Allocations DPD through a combination of evidence base updates and consultation.
484	Mohammed Ahmed Lancashire County Council (Environment Directorate)	Not Stated	<p>SPT has two point requiring some clarity.</p> <p>Stage 3 ref 3B.7 Accessibility to primary schools; the method sets out between 800 and 1600 meters or between 10 and 20 minute walk to a primary school. SPT would like clarify how this measurement is taken, is it from a straight line from the site, or taking a defined route taking into consideration natural and manmade obstacles such as river or highway crossings. SPT would also like clarification of the distances quoted in the document and the rationale for using the range of 800 to 1600 meters.</p> <p>Stage 3 ref 3C.6 Schools Infrastructure; School Planning are encouraged to have this included at the assessment stage. Early indication that a school has capacity to accommodate additional children may help to establish suitability. SPT conduct internal and external measurements to ensure schools have enough space for the existing capacity and to assess if the building or site can expand. This can be achieved by remodelling the internal space or building additional classrooms and facilities.</p> <p>If a school is operating at its net capacity it may have the potential to build new class rooms to meet increased need. Section 77 of the Schools Standards Framework Act issued by the DfE sets out the protection of playing fields within a school from development or disposal. If the school site falls short of land to enable external expansion, SPT will advise HBC planning officers. Solutions may include the securing of addition land to replace land lost through expansion.</p>	Noted	<p>3B.7: distance to school should be measured along a safe and accessible route rather than a straight line. There is no standard definition of threshold distance; 800m (10 minute walk) is considered reasonable for a primary school.</p> <p>Support for criterion 2C.6 is noted.</p>

**Q3.b) Do you think the proposed site assessment methodology at Section 3.0 and at Appendix A is an appropriate way to ensure all sites are considered in a consistent way? Please tell us if you think the methodology could be improved in any way:**

Rep ID	Name / Organisation	Appropriate?	Methodology improvements	Council response	Council Notes
487	Melanie Lindsay The Coal Authority	Not Stated	<p>We note that Appendix A of the documents provides Proposed Site Assessment Methodology Framework. The Stage 3 Detailed Site Assessment table includes at 3A.5 consideration of Contaminated land. We are disappointed that this element of the detailed site assessment does not include consideration of unstable land.</p> <p>The Coal Authority provides the LPA with downloadable data in respect of Development Risk and Surface Coal Resource plans. We would expect any proposed site allocations to be assessed against a review of this data in order to ensure that any coal mining legacy and surface coal resource issues are identified at an early stage.</p> <p>It is recommended that the Site Assessment Methodology is amended as follows:</p> <p>3A.5 <u>Contaminated and Unstable Land</u> Is the site potentially constrained by contamination and/or land instability, and if so to what extent? GGP, Council GIS System, Coal Authority data HBC Contaminated Land Officer, Environment Agency, Coal Authority No, or; Yes- Contamination and instability known and remediation requirements viable Yes – details of contamination, instability and/or remediation requirements unknown Yes, remediation requirements assumed unviable</p> <p>* Our recommended text is underlined.</p>	Agree - minor modification	Extend scope of assessment criterion 3A.5 to include reference to unstable land
490	Helen Ledger Sport England		<p>Appendix A - site assessment framework: I suggest that any past or current sporting use be picked up here, perhaps under the location assessment factor, either under conservation/environment, open space/GI or a new subsection. It might be worth considering also the site's proximity to existing sporting infrastructure, e.g. local leisure centres, playing field hub sites etc, to link up with any potential S106 or CIL contributions to deliver for the new sporting needs arising from new residents. Beware expanding school buildings very often necessitates in building on the playing field which will trigger our statutory role.</p>	Further consideration required	Consider inclusion of further assessment factor to consider the impact of the development on open space/sporting use and accessibility to existing sporting infrastructure

**Q3.b) Do you think the proposed site assessment methodology at Section 3.0 and at Appendix A is an appropriate way to ensure all sites are considered in a consistent way? Please tell us if you think the methodology could be improved in any way:**

Rep ID	Name / Organisation	Appropriate?	Methodology improvements	Council response	Council Notes
501	Daniel Hughes PWA Planning	Yes	<p>The approach in Section 3 is supported. However, any assessments will need to ensure that the strategy selected in the Core Strategy Review can be delivered. Likewise, the eventual allocations need to contribute to delivering sustainable development in ensuring the right sites are brought forward at the right time. In this regard, we are fully supportive of the need for a Green Belt review and to update settlement boundaries to ensure sites come forward in suitable sustainable settlements.</p> <p>This is particularly prudent given the text included in both Paragraphs 4.3 and 4.4 of the document which relate to the Green Belt and Areas of Special Restraint. PWA Planning is fully supportive of this review as it is considered many of the boundaries and designations are outdated. In particular, as discussed under the call for sites heading below, the site put forward as part of this submission, 'Land north of Blackburn Road', is considered a suitable candidate in this review. The release of such land from the Green Belt and Areas of Special Restraint, would help to round off existing settlements and help to ensure developments within the emerging Local Plan are sustainably located and help meet the principles of sustainable development. As such, whilst in general agreement with the principles of the Green Belt Review, it is important to ensure that consideration is made to ensure that boundaries of the development areas identified in the consultation document (in accordance with Paragraphs 84 and 85 of the NPPF), incorporate all potential land.</p>	Noted	Support for the approach to the Site Assessment Methodology is noted. The SAM plus the parallel SA process seeks to ensure that the plan will deliver sustainable development.
517	Stuart Booth JWPC Ltd	Yes	(no detail given)	Noted	none
525	Tim Bettany-Simmons Canal and River Trust	Yes	Within section 3.14, the Trust consider that land stability should also be considered. Construction work associated with development in close proximity to our waterways has the potential to adversely affect the structural integrity of the canal, cuttings or embankments. Land stability and the consideration of development with regards to ground conditions are material considerations as set out in paragraph 120-121 of the NPPF and NPPG at paragraph 001 (Reference ID; 45-001-20140306) onwards.	Agree - minor modification	Include reference to unstable land/ground conditions at factor 3A.5 (see also Rep ID 487). Note that DM DPD policy DM33 para.4 seeks to minimise impacts on canal and associated infrastructure.

**Q3.b) Do you think the proposed site assessment methodology at Section 3.0 and at Appendix A is an appropriate way to ensure all sites are considered in a consistent way? Please tell us if you think the methodology could be improved in any way:**

Rep ID	Name / Organisation	Appropriate?	Methodology improvements	Council response	Council Notes
533	Judith Douglas Judith Douglas Town Planning Limited	No	<p>At 3.5 of the document it is stated that all sites which play a low or moderate contribution to Green Belt purposes may be assessed as part of the methodology leading to eventual allocation of sites. It is noted from the March 2018 Green Belt Assessment report prepared by Arup that sites have been categorised 'no', 'weak', 'moderate' and 'strong' contribution to the overall purposes of the Green Belt. The categorisation has been applied at two levels:</p> <ul style="list-style-type: none"> <li>• by 8 general areas including the extensive area 1 to the south west, west, north and north east of Great Harwood; and</li> <li>• by 86 smaller land parcels contained within the 8 general areas.</li> </ul> <p>It is our submission that the 8 general areas are far too extensive to form a basis for categorisation that would allow for or preclude assessment of sites for the new Local Plan. Rather, a more nuanced and finer tuned approach should be adopted. Thus, if any 'screening out' of Green Belt sites is to take place as part of the Council's methodology it should only be applied at the level of the smaller land parcels and then only to those parcels categorised as making a 'strong contribution' to the purposes of the Green Belt.</p>	Noted	Stage 2 of the SAM factor 2.3 determines whether sites are screened out depending on proximity to urban boundary and outcomes of Green Belt Assessment where relevant. Matters in relation to the overall development strategy and quantum of development will determine whether it is necessary to release any land from Green Belt. Sites which play a low or medium contribution may be considered.
534	Warren Hilton Highways England	Not Stated	<p>A number of measures are set out in the Scoping and Site Assessment Methodology which will be used by the Council when assessing the suitability of sites prior to them being allocated for development during the plan period. Highways England notes and welcomes that sites will be assessed on their accessibility by active modes, public transport, proximity to the SRN, employment areas and district centres and will also be assessed on impacts upon highway capacity and safe access.</p> <p>We also note that the Scoping and Site Assessment Methodology has not been separated into distinct housing and employment sections, unlike the practice of other Councils. While it is not strictly necessary to methodologically differentiate between housing and employment sites, it is important to bear in mind that the impacts of commercial and residential development will be different, and therefore different assessment approaches and mitigation measures may be required.</p>	Noted	Comments noted.

**Q3.c) Please tell us if you have any other comments on any aspect of Consultation Paper 3 which are not covered already:**

Rep ID	Name / Organisation	Methodology improvements	Council response	Council Notes
400	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	<p>The Open Space / Green Infrastructure Study (not started - expected 2018) and Habitat Surveys (not started - expected 2018/19) should identify areas where the ecological network is weak or broken and where the DPD will be looking to strengthen / enhance the network. The Local Plan should be proactive in this respect, not just protecting things - but enhancing them.</p> <p>In Site Screening (Stage 2), Detailed Appraisal (Stage 3) and Review of Established Boundaries/Other Designations (Stage 4) there should be specific reference to the internal and cross-boundary ecological network as required by the NPPF.</p>	Noted	<p>The GI network will be informed by, among others, the existing environmental networks and designations identified in the DM DPD and the habitat survey (as set out at 4.7).</p> <p>Impacts on ecological networks will be assessed as part of the SAM (3A.10 - Ecological networks) and take into account cross-boundary matters.</p>
507	Rachael Graham	<p>3. Site Allocations DPD – Scoping and Site Assessment Methodology</p> <p>We support the continued development of the evidence base to support the delivery of the Site Allocations DPD &amp; the subsequent matters identified for the document to address, including a Green Belt Review.</p>	Noted	Support for development of evidence base noted.