

# Pendle Local Plan Fourth Edition



## Regulation 22 (1) (c) (v) Consultation Statement

### Pendle Local Plan

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## Versions

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## 1. Introduction

- 1.1 The [Town and Country Planning \(Local Plan\) \(England\) Regulations 2012](#) set out the framework for producing Local Plans. The Regulations stipulate the plan making stages which precede independent examination. [Regulation 22](#) within Part 5 (Local Plans) sets out the documents and information that must be submitted to the Secretary of State as part of the Examination.
- 1.2 This Statement has been prepared to confirm how Pendle Borough Council (the Council) has met the requirements of Regulation 22 (1) (c) (v). It provides a summary of the representations made pursuant to [Regulation 20](#) – i.e. those submitted in response to the [Regulation 19](#) public consultation, which considered the Publication Draft of the Pendle Local Plan Fourth Edition (the Local Plan). Full copies of the individual representations have been submitted, alongside the Local Plan, its supporting documents, and evidence for further consideration by the Inspector appointed by the Planning Inspectorate to conduct the independent Examination. Redacted copies of these representations will also be made available as part of the Examination Library.
- 1.3 This statement does not address representations made earlier in the plan-making process. Those representations, the Council's response and any amendments made to the Local Plan arising from the comments that were made are set out in detail in the separate Regulation 18 Consultation Statement (September 2024). This document was made available for consideration during the Regulation 19 public consultation and forms part of the wider submission for examination. In accordance with Regulation 22 (1) (c) (i-iv), the Regulation 18 Consultation Statement confirms:
- (i) Which bodies and persons the local planning authority invited to make representations under regulation 18.
  - (ii) How those bodies and persons were invited to make representations under regulation 18.
  - (iii) A summary of the main issues raised by the representations made pursuant to regulation 18.
  - (iv) How any representations made pursuant to regulation 18 have been taken into account.
- 1.4 Section 2 shows the key stages in the preparation of the Local Plan.
- 1.5 Section 3 details the consultation procedures that were followed by the Council when making the Publication Draft Local Plan available for public consultation. Appendices 1-3 provide extracts of the consultation materials that were produced to advertise the public consultation and encourage the submission of comments.
- 1.6 Section 4 provides an overview of the responses received in response to the Regulation 19 public consultation.
- 1.7 Section 5 summarises the key issues raised in response to the Regulation 19 public consultation. The Council's responses to the comments that were submitted, ordered by representation number and policy number / document order are set out in Appendices 4 and 5 respectively.

## 2. Production timetable

- 2.1 The preparation of a new Local Plan requires a number of thorough and robust stages of informal engagement and formal public consultation. This is to facilitate early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document, tailored to meeting the future development needs of Pendle.
- 2.2 Information on the various stage in the preparation of the Local Plan are set out in the Council's Local Development Scheme (LDS) and on the Local Plan webpage. The timetable in Table 2.1 outlines main stages in the preparation of the Pendle Local Plan Fourth Edition 2021-2040 up until the submission date of 18 February 2025.

**Table 2.1: Production timeline**

Date	Stage	Description
Winter 2021	Publication	On Thursday 9 December 2021, Council resolves to abandon work on the Pendle Local Plan Part 2: Site Allocations and Development Policies and proceed with the preparation of a single Local Plan.
Summer 2022	Scoping	Review existing policies, identify issues, gaps in the evidence base and commission new evidence, as necessary. Consultation with the prescribed bodies to consider the scope of the Local Plan and the Sustainability Appraisal. The formal consultation period ran for four weeks from Friday 8 July to Friday 5 August 2022.
Summer 2023	Preferred Options (Reg 18)	On Thursday 25 May 2023, the Council's Executive approved the first draft of the new Local Plan for public consultation. The statutory Reg. 18 public consultation ran for eight weeks from Friday 23 June to Friday 18 August 2023.
2023/2024	Plan amendments	Consider consultation responses and amend the first draft of the Local Plan to reflect the comments received and new or updated evidence, as required. Key evidence base documents update at this time include: <ul style="list-style-type: none"> <li>Housing &amp; Economic Development Needs Assessment (2023)</li> <li>Housing Need Update (2024)</li> <li>Local Plan Viability Assessment (2024)</li> <li>Level 2 Strategic Flood Risk Assessment (2024)</li> </ul>
Autum 2024	Publication (Reg 19)	On Thursday 26 September 2024, Council approved the final draft of the new Local Plan for public consultation and subsequent submission to the Secretary of State for independent Examination. The consultation focussed on whether the plan the Council proposed to submit to the Secretary of State was sound and legally compliant. The statutory Reg.19 public consultation ran for six weeks from Friday 25 October to Friday 6 December 2024. In accordance with the Local Plan Regulations, this consultation was formal and statutory seeking specifically the Plan's soundness
Winter 2025	Submission (Reg 22)	The Council assessed the representations received in response to the formal public consultation held in accordance with Reg 19. The Council concluded that the Local Plan is sound and could be submitted for Examination in Public (EiP). The Local Plan and supporting documents were submitted to the Secretary of State on Tuesday 18 February 2025,

### 3. Consultation Procedure for the Publication Draft Local Plan (Regulation 19)

- 3.1 Council approved the Local Plan for publication and its subsequent submission for examination at the [meeting held on 26 September 2024](#).
- 3.2 Consultation on the Publication Draft (Regulation 19) Local Plan commenced at 9am Friday 25 October 2024. The consultation ran for six (6) weeks, closing at 5pm Friday 5 December 2024. Comments were invited on the consultation documents (Publication Draft Local Plan, Policies Map, Sustainability Appraisal, Habitats Regulations Assessment, and Regulation 18 Consultation Statement) as well as other supporting documents and evidence. Publicity materials made clear that the focus of the Regulation 19 public consultation was on matters of legal compliance and soundness.
- 3.3 In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the [Statement of Representations Procedure](#) was issued confirming:
- The timings of the consultation;
  - The title, subject matter and area covered;
  - Details of how to view the consultation documents;
  - Information on how to submit comments;
  - Information on what happens with comments, and next steps, including how to be involved at the examination.
- 3.4 The Council used the following methods to publicise the consultation (see Appendix 1):
- Poster
  - Release(s) via the Council's social media channels (including Facebook, X (formerly Twitter), Instagram and LinkedIn)
  - Framework newsletter
- 3.5 Notice of the public consultation was sent to the prescribed bodies as outlined in Table 3.1. The local planning authorities adjoining the Pendle boundary (Burnley Borough Council, Ribbles Valley Borough Council, North Yorkshire Council, City of Bradford Metropolitan District Council, and Calderdale Metropolitan Borough Council), and local planning authorities within the wider Pennine Lancashire sub-region (Blackburn with Darwen Council, Hyndburn Borough Council and Rossendale Borough Council), and Lancashire County Council, were also notified directly.
- 3.6 In addition, details of the public consultation were distributed to:
- 1,071 individuals, businesses or organisations included on the Council's planning policy database.
  - 1,500 individuals, businesses or organisations registered to receive updates via Pendle Council's E-news bulletins.
  - 22,400 individuals, businesses or organisations who subscribe to or follow the Council's social media channels.

- 37 Town and Parish Councils either wholly within Pendle or adjoining the borough boundary.

**Table 3.1: Prescribed Bodies**

Prescribed Body	Representation Received at Reg 18? (Yes/No)
Environment Agency	Yes
Historic Buildings and Monuments Commission for England – Historic England	Yes
Natural England	Yes
Civil Aviation Authority – NATS En-Route Plc (NERL)	No
Homes England	Yes
East Lancashire Clinical Commissioning Group	No
Office of Rail Regulation	No
Highways Authority – Lancashire County Council	Yes
Highways Authority – National Highways	Yes
Lancashire Local Enterprise Partnership	No
Network Rail	No
Canal & Rivers Trust	Yes
Coal Authority	Yes
United Utilities	Yes
Yorkshire Water	No
Sport England	Yes
Electronic Communications Code – via Mono Consultants	No
Local Lead Flood Risk Authority – Lancashire County Council	Yes
Local Education Authority – Lancashire County Council	Yes
Lancashire Constabulary	No
Lancashire Fire and Rescue	No
Lancashire Local Nature Partnership – Lancashire Wildlife Trust	No
South Pennines Local Nature Partnership	No
Forest of Bowland National Landscape Management Board – Lancashire County Council	No
Ministry of Housing, Communities and Local Government	No

- 3.7 The consultation webpage was hosted on the Pendle Council website using the friendly url: <http://www.pendle.gov.uk/LPpublication>. A direct link to this webpage was possible from an advertisement placed on the homepage of the Pendle Council website.



- 3.8 The consultation webpage (see Appendix 2) included the Statement of Representation Procedure. It also included weblinks to the consultation documents and the Policies Map. The deposit locations, where copies of the Local Plan, Sustainability Appraisal Non-Technical Summary and Habitats Regulations Assessment were made available, during their normal opening hours, were also listed on the website and are confirmed below:
- Barnoldswick Library, Fernlea Avenue, Barnoldswick, BB18 5DW
  - Barrowford Library, Ann Street, Barrowford, BB9 8QH
  - Brierfield Library, Colne Road, Brierfield, BB9 5HW
  - Colne Library, Market Street, Colne, BB8 0AP
  - Earby Library, Earby Community Centre, New Road, Earby, BB18 6XA
  - Nelson Library, Market Square, Nelson BB9 7PU
  - Number One Market Street, Market Street, Nelson, BB9 7LJ
  - Trawden Community Library, Church Street, Trawden, BB8 8RU
  - Mobile Library
- 3.9 The consultation webpage outlined when, how and by what means to comment, providing a correspondence address and other contact details. It included links to a printable copy of the Representation Form and the Online Representation Form, which were the preferred methods for people to respond to the consultation (see Appendix 3). The consultation webpage also confirmed what would happen to the representations that were received, the next steps in the plan-making process, and how interested parties could be involved in the Examination.
- 3.10 No public events or exhibitions were held during the consultation period. This reflects the nature of the consultation which only sought feedback on the legal compliance and soundness of the Local Plan rather than detailed comments about how to improve the plan or alternative policy proposals, as these had been addressed in the earlier stages of plan preparation. Details of earlier public events arranged in support of the plan preparation process are set out in the Regulation 18 Consultation Statement.
- 3.11 Actions to publish and raise awareness of the public consultation have been proportionate and sufficient for the Council to discharge its duties with regard to Regulation 19. The advertising and promotion of the public consultation was carried out in accordance with the Council's adopted [Statement of Community Involvement](#) (SCI) which sets out how the public, organisations and other interested parties will be involved and engaged in the preparation of new planning documents. The SCI, which was reviewed and adopted in September 2022, has helped to guide the Council's approach to public consultation and publicity throughout the plan-making process.



## 4. Overview of Consultation Responses

- 4.1 A total of 138 representations were duly made in response to the public consultation to consider the Publication Draft Local Plan, and these contained 538 individual comments. A further four representations were received after the consultation had closed. A wide range of individuals, organisations and groups responded to the consultation, including responses from residents and community groups, town and parish councils, land promoters (including landowners and their agents), housebuilders, sector specific organisations and bodies, and key stakeholders specifically:
- Canal & River Trust
  - Coal Authority
  - Environment Agency
  - Historic England
  - Homes England
  - Lancashire County Council (Active Travel, Education, Health, Housing and LLFA)
  - Lancashire Wildlife Trust
  - NHS Property Services
  - National Highways
  - Natural England
  - Sport England
  - United Utilities
  - Woodland Trust
- 4.2 Comments were made both in support and objection to the Local Plan. As well as commenting on the Local Plan responses were also received in relation to, or in acknowledgement of, the following documents which form part of the evidence base:
- Biodiversity Audit
  - Green Belt Assessment
  - Green Infrastructure Strategy
  - Habitats Regulations Assessment
  - Housing and Employment Needs Evidence (HEDNA, and Housing Needs Review)
  - Infrastructure Delivery Plan
  - Level 1 and Level 2 Strategic Flood Risk Assessment
  - Local Development Scheme
  - Local Green Space Methodology and Assessment
  - Local Plan Viability Assessment
  - Open Space Audit

- Settlement Sustainability Review
- Strategic Housing Market Availability Assessment
- Sustainability Appraisal (including Scoping Report)

- 4.3 Section 4 of this statement provides a summary of the key issues raised during this consultation. A more detailed account of all comments made, and the Council's response, is set out in Appendices 4 and 5.
- 4.4 Some representations have highlighted the need to recommend some minor modifications to the Local Plan as submitted for Examination. These recommendations do not change the policy approach that has been consulted upon, instead they address typographical errors and minor points of clarification etc. The recommended changes are set out in the separate Schedule of Proposed Minor Modifications (the Schedule), which forms part of the submission. The Council understands that it is for the Inspector to determine whether these modifications should be accepted, however for the reasons set out within the schedule, the Council is supportive of these changes to the Local Plan.

## 5. Summary of Issues Raised

- 5.1 The majority of representations were received from Pendle residents. Many of these focussed on specific aspects of the Local Plan rather than issues of soundness or legal compliance. Residents were generally supportive of the Local Plan, considering that it provides a proportionate and realistic approach to guiding development and growth given the borough's constraints, needs and opportunities. They support the role provided by the Local Plan in directing development towards sustainable locations and the certainty this provides to their community and the protection afforded to the natural environment. They strongly support the designation of specific sites for Local Green Space.
- 5.2 A number of statutory bodies are also broadly supportive of the Local Plan, with limited changes sought to the wording of the policies as drafted. Their support reflects the extensive informal and formal engagement that has taken place with key stakeholders throughout the development of the Local Plan.
- 5.3 Comments submitted in favour of the Local Plan express specific support for the following policies largely as drafted; SP02, SP03, SP05, SP06, SP08, SP09, SP10, DM01, DM02(a), DM02(b), DM03, DM04, DM05, DM06, DM07, DM08, DM09, DM10, DM11, DM12, DM13, DM16, DM18, DM19, DM20, DM21, DM24, DM25, DM26, DM27, DM28, DM30, DM31, DM32, DM33, DM34, DM35, DM42, DM43, DM45, AL01 and AL02. These comments highlight:
- Support the proportionate approach to the distribution of development represents a sustainable strategy.
  - Support the direction of development towards urban areas.
  - Support policies which promoted active travel and in particular the emphasis on the creation of places which support active design principles.
  - Support the position taken that exceptional circumstances do not exist to justify the release of land from the Green Belt to meet housing need.
  - Believe that the policies of the Local Plan will help conserve and enhance the historic environment in Pendle.
  - Support the emphasis placed on climate change.
  - Support the approach to development and protection afforded to the Forest of Bowland National Landscape and South Pennines SSSI.
  - Support the protection of locally valued green spaces and identification of specific sites as Local Green Space (though some respondents feel additional sites should have been identified).
  - Support the restrictions placed on hot food-takeaways in specific parts of the borough (though some respondents don't feel that the policy goes far enough).
  - Believe that the housing requirement is a realistic and proportionate response to the evidence on housing need.
  - Support the emphasis on the redevelopment of brownfield land to meet housing need and the role this has in supporting the regeneration of the borough.

- Support policies which seek to secure high quality development, the efficient use of land, and adoption of adaptable home standards (though some feel that homes suitable for the disabled should be sought as the standard).
  - Support the approach to maintaining town centre vitality and promotion of mixed use development.
- 5.4 Those respondents who consider the Local Plan to be unsound focus on the justification and consistency of the Local Plan's proposals when considered against the December 2023 version of the National Planning Policy Framework (NPPF) and its successor, as drafted in July 2024. In particular they focus on its approach to promoting future development and growth and the detailed wording of specific policies. The supporting evidence (particularly that addressing housing need and economic growth) is challenged and they question the plan's deliverability (in terms of whether specific sites and the overall distribution of development can be achieved during the plan period). They question whether the plan is positively prepared focussing on the plan's general approach to development and its consistency with government policy and the NPPF.
- 5.5 Most of these comments have been submitted by landowners, agents, land promoters and developers. They predominantly relate to the housing policies of the Local Plan, but objections have also been made to several of the environmental policies, particularly with regard to flood risk, drainage and climate change. Many objectors are promoting sites which have not been included as site allocations within the plan (omission sites) and highlight the suitability, availability and achievability of these sites, with concerns raised about the soundness and deliverability of several proposed site allocations in Policy AL01. Respondents set out that there is a need for further housing land allocations and request that the Council adopts a more flexible and positive approach to speculative development in locations outside, but adjoining settlement boundaries.
- 5.6 Representations have also addressed the approach taken in the assessment of sites proposed for designation as Local Green Space, and the consistency of this policy approach given the need to deliver sustainable development and the need to ensure that the sites which are proposed for designation are 'demonstrably special' to the local community. Concerns have also been expressed about the Council's approach to the protection of open space and green infrastructure, and in particular highlighting the age of the evidence of several documents addressing these matters. Other concerns address the information requirements and policy response to climate change, the impacts of policy requirements on viability, and the consistency of the proposed flood risk policy with national planning policy and its wider implications for delivery.
- 5.7 The key issues which are raised mainly relate to matters of soundness in relation to policies SP06, SP12, DM01, DM02(a), DM02(b), DM04, DM09, DM12, DM20, DM21, DM22, DM23, DM27, DM28, DM31, DM33, DM34, DM35, DM40, DM41, AL01. These matters include:
- Policy SP06 / DM01 – Should not require the adoption of efficiency measures which are not justified or supported by evidence. Information requirements of policy should be proportionate.
  - Policy SP12 – Should make provision for the delivery of health infrastructure needs associated with new development.

- Policy DM02(a) – Is inconsistent with national planning policy in its requirement for a sequential test. Requirements for finished floor levels will unnecessarily challenge deliverability and significantly increase development costs.
- Policy DM02(a) – Needs to consider the impacts of sewer and reservoir flooding in greater detail.
- Policy DM04 – Should not require BNG above the minimum 10%. The policy should lend greater support to swift bricks.
- Policy DM09 – Is inconsistent with the NPPF in terms of the restrictions placed on development in the open countryside, a more flexible approach is required.
- Policy DM12 – The proposed designation of Local Green Space sites has not been considered in the context of delivering sustainable development and the longevity of sites beyond the end of the plan period. Specific sites identified (see Appendix 8 of the Local Plan) are not ‘demonstrably special’.
- Policy DM20 – The proposed housing requirement does not reflect the recommendations of supporting evidence. The housing and employment strategies are not aligned with Policy DM40 seeking full provision of assessed employment land need. The adoption of the proposed housing requirement will constrain economic growth and could result in increased outward commuting. The proposed requirement is inconsistent with national planning policy and is not positively prepared. The housing requirement should be increased to align with the recommendations of the supporting evidence base.
- Policy DM20 – The proposed housing requirement is inconsistent with government policy on economic growth and aspirations to deliver 1.5 million new homes a year. The Local Plan is incompatible with proposals set out in the draft version of NPPF as consulted on in September 2024. Some respondents consider that the Council should restart plan making in conformity with the policies of the revised NPPF. Alternatively a policy requiring an immediate review of the Local Plan should be incorporated into the Local Plan with further amendments to policies related to the supply of housing to enable proposals for sustainable development outside but adjacent to settlement boundaries to fulfil this unmet need as an interim measure.
- Policy DM20 – The Local Plan is ineffective in meeting the assessed affordable housing needs of the borough. Insufficient weight is attached to this need. The housing requirement should be increased, and greater role should be provided to greenfield sites in meeting housing needs. Consideration should be given to more allocations in higher value areas to meet housing needs.
- Policy DM20/AL01 – Insufficient housing allocations have been identified to respond to the assessed housing needs of the borough. There is insufficient flexibility in the amount of new homes planned for through the Local Plan raising questions of its deliverability. The sites identified themselves are not deliverable and face constraints to their development. The role of windfall development as part of the supply is disproportionate and further reduces scope for affordable housing delivery. The role of vacant dwellings in meeting housing needs should be recognised.
- Policy DM21 – The policy needs to be evidenced and ensure it does not adversely impact viability and deliverability of development.
- Policy DM22 – The housing mix sought by the Local Plan does not reflect the built character of specific parts of the borough. Housing mix should differ by sub-area in

Pendle. The housing mix required does not reflect the supporting evidence and the policy is inflexible.

- Policy DM27 – The requirements for self-build lack justification and challenge delivery. The requirement for applicants to be the occupier of self-build proposals is too restrictive and is disproportionate.
- Policy DM28 (and Policy DM23) – The Local Plan makes insufficient provision for the housing needs of the elderly. The affordable housing requirement should not be applied to schemes for older persons' housing. The viability assessment should be re-run to include all older persons' housing typologies.
- Policy DM31 – The supporting evidence to the policy is out of date. Policy requirements are inconsistent with national planning policy.
- Policy DM34 – Requirements for public consultation are disproportionate.
- Policy DM41 – The Council need to be more flexible in enabling the reuse of existing protected employment land for other land uses particularly housing.
- Policy AL01 – Little evidence of deliverability. Sites included are affected by flood risk, amongst other issues which render them unsuitable and undeliverable for housing. Insufficient detail in policy requirements to address the issue of flooding from sewerage infrastructure.
- Appendix 3 – It is unclear whether the commuted sum calculator has been subject to viability testing.
- Appendix 7 – The flowchart of the assessment of Local Green Spaces outlined adopts an approach which does not reflect that outlined in the NPPF.
- Appendix 8 – Particular sites should/should not be identified as Local Green Space.
- Appendix 10 – Indicators and targets should reflect the policies of the revised NPPF including the mandatory housing target established for Pendle.

5.8 A number of representations have been made in the belief that the playing fields at Barrowford Road, Colne (Sites P083 and P111) are to be allocated for housing development. This is not the case as evidenced by their omission from Policy AL01. The respondents have picked up on their assessment as potential Local Plan housing site allocations and their inclusion in both the Strategic Housing Land Availability Assessment (SHLAA) (2024) and the Playing Pitch and Outdoor Sport Strategy (2024). Although the allocation of these sites for housing is not proposed in the Local Plan, the representations nevertheless raise material considerations relevant to the assessment and consideration of these sites in the aforementioned documents.

5.9 Representations have also been received setting out that the Local Plan is not legally compliant for the following reasons:

- The Local Plan fails to reference or properly apply the Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024 which define the irreplaceable habitats to be used in respond of the NPPF and Biodiversity Net Gain (BNG).
- The Regulation 22 Statement has not yet been published.
- Two key documents supporting the plan are in draft form and have not been endorsed by the Council.

- 5.10 The Council has recommended a minor modification to Policy DM04 to address the first point in the list above.
- 5.11 The second point misinterprets the guidance on plan-making as it is evident that a summary of the representations received in response to the Regulation 19 public consultation cannot be published before it has concluded.
- 5.12 One respondent expressed the view that, in the context of proposed changes to the national planning policy framework, council officers have been disingenuous in forcing the Local Plan, as drafted, past elected members without full consideration of the options available to them. They feel that the Local Plan has been rushed through to submission before the latest version of the National Planning Policy Framework (as adopted in December 2024) could come into effect.
- 5.13 Another respondent claims that the Local Plan has not been prepared in accordance with the 'Local Plan Procedure Guide' because the Local Plan Viability Appraisal and the Level 2 Strategic Flood Risk Assessment had not been formally considered by elected members of the Council when officers took the decision to take the Local Plan to Committee with a recommendation to consult on and subsequently submit the Local Plan for independent examination. They consider that a further public consultation to consider the findings of these documents is required to ensure that the Local Plan reflects their findings. In reality the final drafts of both documents had been made available to planning officers well in advance of the Council meeting and their evidence is reflected in relevant policies of the Local Plan. There is no formal requirement for the Council to consult the public on evidence base documents, but in line with established council procedures both documents were made available for comment as part of the statutory six week public consultation on the Regulation 19 Publication Draft Local Plan.
- 5.14 The above points summarise the key issues raised in the formal representations received in response to the public consultation on the Regulation 19 Publication Draft Local Plan. Appendices 4 and 5 provide greater detail on the matters raised by each respondent and are presented in order of Respondent ID (Appendix 4) and policy number/document order (Appendix 5).