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Date: 12th May 2025

By email

Hyndburn Local Plan Examination – Council’s response to Inspectors initial letter INSP002

Further to your initial letter (INSP002), please find below the Council’s response to your queries and requests for additional information and documents. The response goes through each of your points in turn.

In relation to questions IDQ1, IDQ2 and IDQ12. The Council has requested more time to prepare the information. The Council has suggested that all information will be provided no later than Monday 30th June 2025. This is due to annual leave occurring in the team from the last week of May until the second week of June. The Council will endeavour to provide all information at the earliest available opportunity.

Yours faithfully,

Adam Birkett

Adam Birkett
Head of Planning & Transportation



HYNDBURN BOROUGH COUNCIL’S RESPONSE TO INSPECTOR’S INITIAL QUESTIONS (DATED 22/04/25)

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INSPECTORS QUESTIONS AND COUNCIL'S RESPONSE

Ref	Inspectors Question	Hyndburn Borough Council's Response
Duty to Cooperate		
IQ1	It is noted from the DtC Statement (HBC10.001) that Statements of Common Ground (SoCG) with National Highways, Burnley Borough Council and Lancashire County Council Education Department are still in preparation. Please can the Council advise when these are likely to be available.	<p>The Statements of Common Ground (SoCGs) with National Highways, Burnley Borough Council and Lancashire County Council Education Authority are still under preparation. We would expect that these will all be available no later than the end of June.</p> <p>Hyndburn Borough Council (HBC) will provide the signed copies of these SoCGs as soon as they are available.</p>
IQ2	I would also encourage the Council to prepare a SoCG with Heritage England to set out the areas of agreement and disagreement (if any remain).	HBC have begun preparation of a SoCG with Historic England. We would expect to have a signed copy of this by the end of June in line with the other SoCGs.
Integrated Impact Assessment (incorporating Sustainability Appraisal)		
IQ3	The Integrated Impact Assessment (IIA) of Hyndburn 2037: Local Plan (HBC2.010a) is dated November 2023 and assesses the Hyndburn Local Plan 2037 predating the Regulation 19 (2) submission Plan. The	<p>The Integrated Impact Assessment (IIA) was prepared for the Regulation 19 consultation that was undertaken in November 2022 to January 2023. The Local Plan document at this time had a time period that ran until 2037. Due to a procedural issue that occurred during this consultation there was a requirement to rerun this consultation. This is set out in document HBC1.007a.</p> <p>HBC took consideration of comments made at Regulation 19(1) and made some amendments to the Local Plan for re-consultation at Regulation 19(2). This specifically included:</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
	<p>submission Plan extends the plan period to 2040 and incorporates modifications to address comments made by statutory consultees. Is an addendum to the IIA required?</p>	<ul style="list-style-type: none"> • Amending the Plan period to 2040 to reflect a need for a minimum 15 year plan period. • The removal of HP3 Woodnook Works, Bath Street Site and HP7 Land bound by Park Rd, Balfour St, Wood St and Heys Lane site. <p>HBC consider that these amendments, whilst not minor modifications, do not materially affect the assessment outcomes that were undertaken or introduce new significant effects that were not considered through the IIA process. HBC therefore consider that the submitted IIA adequately assesses the likely environment, social, and economic effects of the Plan as submitted.</p> <p>HBC also identify that any amendments to the plan would be likely to affect the final years of the plan where this has been extended from 2037 to 2040. HBC commits to reviewing the plan every 5 years reducing any potential risk further.</p> <p>HBC have taken a pragmatic and proportionate approach to considering whether an updated IIA would be required, which has both time and cost implications.</p> <p>If it was felt that the IIA does not meet legal compliance, then HBC would recommend that any concerns around the IIA could be incorporated into the main modifications and re-consulted at this stage of the plan process.</p>
<p>IQ4</p>	<p>The IIA considers four housing growth options and concludes that Option 3, the medium growth option of 4920 dwellings over the Plan period is the most positive option overall. The IIA does not specifically set out the effects of the four options but refers to a Justification Paper dated 2019. Can the Council please provide details of the</p>	<p>The IIA details for each of the growth options are set out in document HBC2.007b Reg18(1) SA Core Strategy Review & allocations report. Further assessment of each individual site is set out in document HBC2.007g.</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
	actual findings for each growth option.	
Flood Risk		
IQ5	<p>A number of allocated sites are at risk of flooding. I understand that development on these sites can be located to avoid the parts of the site at risk and the Environment Agency has withdrawn its objection to the allocation of these sites. Are these non-developable areas taken into account in arriving at the anticipated dwelling numbers/employment floorspace on these sites.</p>	<p>Housing Sites</p> <p>For the affected housing allocations (aside from HGV sites), the net deliverable area has been adjusted to take account of the flood risk area.</p> <p>The Environment Agency have asked HBC to include the following text on the maps “the areas at risk of flooding in each of these sites should be removed from the developable area, unless it can be demonstrated, through a comprehensive site-specific FRA, that the flood risk can be overcome, and those parts of the site can be developed safely”. HBC have removed the flood risk area as a precaution but acknowledge that innovative solutions may be found which enable development on a greater area, in some cases.</p> <p>Huncoat Garden Village</p> <p>Sites in Huncoat Garden Village have been subject to a detailed master-planning exercise which identified appropriate numbers of dwellings on each site. The numbers are considered indicative at this stage and are subject to change depending on any detailed permission which may be granted on a site or as more information emerges on developable areas.</p> <p>Employment Sites</p> <p>For the employment allocations only a gross developable area has been given in the Local Plan. However, all sites (aside from EMP1 and EMP2) are subject to ongoing detailed master-planning work, as with Huncoat Garden Village this will inform the detailed design.</p> <p>The Council has undertaken an internal study to identify some development constraints on the developable area on employment sites EMP3 and EMP4 - EMP6 - this is available in Appendix 1 (Examination Ref H003). Whilst this does not explicitly include the flood risk areas, it includes some constraints associated with flood risk such as the canal and fish pond on EMP3. It is thought</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
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that the gross developable area can accommodate these constraints whilst delivering the necessary land for employment use.

Whilst EMP1 lies in Flood Zone 1, it does include a large area of RoSWF in its northern portion. The vast majority of this has a 0.1% chance of flooding, the lowest probability. As the site is not being master-planned, the Council request that a net deliverable area is included for the site in the plan as a modification. Having removed any areas of flood risk from the developable area, the net developable area would be 3.3ha. However, we believe a larger area will be able to be developed given suitable mitigation measures.

The other employment site that is not going to be master-planned is EMP2, although the area that is at risk of flooding is minimal so it is thought unnecessary to have a defined net deliverable area.

For information, we have prepared the table below which shows the area and percentage of each employment site which is free from fluvial or pluvial flooding:

Table 1: Flood risk area of Employment Sites

Site Ref	Site Area (ha)	Flood Risk free area (ha)	% Flood risk free
EMP1	4.4	3.3	75.3
EMP2	1.7	1.7	99.6
EMP3	45.5	44.9	98.6
EMP4	4.0	3.9	96.5
EMP5	18.1	17.0	93.9
EMP6	20.8	19.1	92.1

Gypsy and Traveller Sites

The Council have undertaken the same exercise for the Gypsy and Traveller sites which contain an element of flood risk. GT1 and GT2 have very low levels of flood risk. However, 12% of GT3 has a

Ref	Inspectors Question	Hyndburn Borough Council's Response																
		<p>low risk of surface water flooding (0.1%). The Council seeks the Inspector's opinion as to whether a net developable area should be included for this site also.</p> <p>Table 2: Flood Risk Area of Gypsy and Traveller Accommodation Sites</p> <table border="1" data-bbox="795 367 1870 558"> <thead> <tr> <th>Site Ref</th> <th>Site Area (ha)</th> <th>Flood Risk free area (ha)</th> <th>% Flood risk free</th> </tr> </thead> <tbody> <tr> <td>GT1</td> <td>0.34</td> <td>0.34</td> <td>98.9</td> </tr> <tr> <td>GT2</td> <td>0.13</td> <td>0.11</td> <td>88.0</td> </tr> <tr> <td>GT4</td> <td>0.50</td> <td>0.50</td> <td>99.5</td> </tr> </tbody> </table>	Site Ref	Site Area (ha)	Flood Risk free area (ha)	% Flood risk free	GT1	0.34	0.34	98.9	GT2	0.13	0.11	88.0	GT4	0.50	0.50	99.5
Site Ref	Site Area (ha)	Flood Risk free area (ha)	% Flood risk free															
GT1	0.34	0.34	98.9															
GT2	0.13	0.11	88.0															
GT4	0.50	0.50	99.5															
IQ6	<p>The flood risk maps for individual sites in Appendix D lack clarity in terms of what they are trying to show. There is no key for example. Furthermore, the maps do not clearly identify which parts of a site should not be developed due to flood risk issues. The Council may wish to review these maps and make modifications in the interest of effectiveness</p>	<p>Together with the Environment Agency, updated, clearer maps have been created. The EA withdrew its objection to the Local Plan after reviewing the updated maps. A PDF of the updated maps is provided to this response at Appendix 2 (Examination Ref. H004), and the requested alteration is listed in the schedule of modifications (HBC1.006 – suggested change number 53).</p> <p>To support the soundness of the plan, the Council asks the Inspector to allow the replacement of the maps in Appendix 4 with the revised maps.</p> <p>Please note that these maps may need adjusting if the Inspector accepts the Council's suggested modification to the site allocations (set out in HBC1.006).</p>																
Transport																		
IQ7	<p>The Local Plan Transport Study 2022 (HBC7.001a) aims to assess the impact of Local Plan growth on the highway network over the Plan period to 2036/7. Does it provide a robust assessment of</p>	<p>The Local Plan Transport Study 2022 (HBC7.001a) provides a robust assessment for assessing the traffic implications of development proposed in the Local Plan, even with the extension of the plan period to 2040. The study was developed using up-to-date modelling techniques and traffic data, and it considers the cumulative impacts of planned growth across the network to 2036/37. This includes all site allocations proposed. This encompasses the majority of the plan's development trajectory.</p>																

Ref	Inspectors Question	Hyndburn Borough Council's Response
	<p>the likely traffic implications of development proposed in the Local Plan now that the Plan period has been extended to 2040?</p>	<p>While the extension to 2040 introduced an additional three years, it is not anticipated that this would significantly alter the conclusions within the study. This is particularly due to the levels of distribution of housing remaining consistent through the final years of the plan period and not introducing any new or untested impacts to the modelling.</p> <p>Furthermore, later development in the plan period is significantly set around the Huncoat Garden Village, which has separate modelling and proposed work to Junction 8 of the M65 which is ongoing. Therefore, any impacts that are being modelled here are expected to be mitigated through work alongside the Huncoat Garden Village Development.</p> <p>HBC is also committed to reviewing the plan every 5 years. Therefore, we would expect to review the transport implications in light of ongoing development and mitigate any potential future impacts later within the plan period.</p> <p>Therefore, taking a pragmatic and proportionate approach to the evidence base, HBC consider that any potential risk to the robustness of the Local Plan Transport Study is extremely limited and mitigated through future plan review.</p>
<p>Employment Land</p>		
<p>IQ8</p>	<p>Paragraph 4.18 of the Plan states that masterplans will be prepared for Whitebirk and Altham strategic employment sites. Can the Council advise on their progress.</p>	<p>Paragraph 4.18 of the Plan outlines the intention to prepare detailed Masterplans for the strategic employment sites at Whitebirk and Altham. It states:</p> <p>“It is proposed to produce detailed Masterplans for the two strategic employment sites at Whitebirk and Altham. When finalised, future development must be based on the provisions of these Masterplans and adhere to recommendations within them.”</p> <p>The Plan includes site-specific policies for both locations. Policy EP1 outlines the key design, environmental, transport, and general considerations for the land south of Altham Business Park. Policies EP2 to EP4 provide the development framework for the Whitebirk site.</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
		<p>In October 2023, Hyndburn Borough Council appointed Nexus Planning Ltd to prepare the Masterplans for both employment sites. This work draws on the evidence base assembled for the Plan, including: Housing and Economic Needs Assessments; Huncoat Garden Village Masterplan; Highways and Transport Evidence; Ecological and Landscape Evidence and Feedback from the Regulation 19 public consultations</p> <p>The following draft documents have been prepared:</p> <ul style="list-style-type: none"> • Baseline Review • Market Review and Development Appraisal (including deliverability and property mix recommendations) • Transport Technical Notes (reviewing current conditions, safety, and impact assessments) • Flood Risk and Drainage Assessments • Draft Masterplans <p>These drafts are currently under officer review. Public and stakeholder consultation is scheduled for Summer 2025, after which the final Masterplans will be completed.</p>
IQ9	<p>The employment land requirement is met though six allocations. It is unclear from the evidence whether there have been any completions since 2021 which contribute to the supply. Can the Council please provide a breakdown of the components of the employment land supply over the Plan period, i.e. completions, commitments, allocations.</p>	<p>A summary breakdown of the components of the employment land supply over the plan period is in table 3. A site-by-site breakdown of the completions since 2021 and sites with planning permission (commitments) is set out in appendix 3 (Examination Ref. H005). The site allocations are set out in Table 4 below. The site allocations cover gross site area and have been broken down to show net site areas corresponding to identified site constraints which can be seen in appendix 1 (Examination Ref. H003). Site Allocations EMP1 and EMP2 do not have net site areas and the council would refer to the response to IDQ5.</p>

Table 3: Employment Land Supply Over the Plan Period (full details available at Appendix 3 (Examination Ref. H005))

Employment Land Supply	Floor Area (Sq. m)	Floor Area (hectares)
Developments Completed Since 2021	29075.1	2.91
Sites with Planning Permission since 2021 (Commitments)	8967.1	0.9
Proposed Allocations (as required by the HENA)	700000	70

Table 4: Proposed Allocations

Site	Gross Site Area (hectares)	Net Floor Area (hectares)	Floor Area (Sq. m)
Land west of J7 Business Park	4.4	4.4	44000
Moorfield Industrial Estate	1.7	1.7	17000
Land to S. of Altham Business Park	45.5	36.8	368000
Land between Blackburn Rd and M65 slipway	4.0	2.28	22800
Land between Blackburn Rd, Sidebeet Lane, Leeds & Liverpool Canal and railway	18.1	8.73	87300
Land N. of railway line between Sidebeet Lane and Leeds & Liverpool Canal	20.7	18.56	185600
Total	94.4	72.47	724700

Ref	Inspectors Question	Hyndburn Borough Council's Response
IQ10	<p>The Garden Village forms a key site for the future growth of the Borough and its development will be guided by a Masterplan adopted in 2021 and a Design Code. The Design Code is not included in the evidence base. Please can it be added.</p>	<p>The Huncoat Design Code (Final Draft Report) is available at Appendix 4 (Examination Ref. H006). The Design Code is currently a draft document and has not yet been ratified by the Council. We are expecting to take the document to Cabinet on the 18th June for approval.</p>
IQ11a	<p>I note that there are multiple landowners involved. Is there one lead site promoter and has there been a Memorandum of Understanding prepared between the relevant parties to secure the delivery of the village. What developer interest exists?</p>	<p>There are series of sites that are proposed for development, in separate ownerships and therefore there is not a lead site promoter or developer. The Council has been working with land owners to promote and bring forward sites for development. All the owners of the sites allocated for housing have appointed agents and plan to dispose of their sites for residential development. The current position is as follows:</p> <ul style="list-style-type: none"> • Former Power Station site – owned by Clowes Developments – advanced stage to dispose site to McDermott Homes who are currently preparing a revised outline application for 355 homes, and a full application to remediate the site. Pre application meeting with McDermott Homes took place on the 24th of April 2025. • Former Colliery site (Dale, McManus and Lancashire County Council) – three ownerships working collaboratively to dispose to a preferred house builder. The list has been reduced to two: Lovell Homes and Persimmon Homes. Lovell Homes have gone through formal pre-application discussions with the Council. • Leithard land (north and south of Burnley Lane) – appointed Savills who are carrying out soft developer testing • Stark Land (north of A56 roundabout) – appointed Savills and carrying out soft developer testing

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		<ul style="list-style-type: none"> RSPCA – Keen to dispose of land for housing. Safe guarded land and therefore plans on hold for the time being <p>Other house builders engaging with the Council, landowners and their agents includes Keepmoat, Barrett Homes, Vistry Group, Gleeson Homes and Roland Homes.</p>																																													
<p>IQ11b</p>	<p>I understand that the site will provide housing during and beyond the plan period. What is the anticipated delivery trajectory. Has the Council given any consideration to contingency measures to maintain housing supply should the site not come forward in the timescales envisaged.</p>	<p>The anticipated delivery trajectory at Huncoat is set out in the table below alongside a map showing the indicative phasing of the sites. Due to the multiple ownerships on the HGV site, there is potential for delivery of sites that are phased for later in the plan period, including the safeguarded land, to deliver earlier to ensure a contingency of housing supply at Huncoat Garden Village. HBC are also committed to annual monitoring of housing delivery and where delivery is lower than expected the Council would look to prepare a Housing Delivery Action Plan and also commit to a 5 yearly review of the plan.</p> <p>Table 5: Anticipated delivery trajectory of HGV</p> <table border="1" data-bbox="801 767 2058 1356"> <thead> <tr> <th><u>Year</u></th> <th><u>Year</u></th> <th><u>No of Homes Delivered</u></th> <th><u>Landowner</u></th> <th><u>Phase</u></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2024/25</td> <td>0</td> <td></td> <td>1</td> </tr> <tr> <td>2</td> <td>2025/26</td> <td>0</td> <td></td> <td>1</td> </tr> <tr> <td>3</td> <td>2026/27</td> <td>0</td> <td></td> <td>1</td> </tr> <tr> <td>4</td> <td>2027/28</td> <td>69</td> <td>Clowes</td> <td>1</td> </tr> <tr> <td>5</td> <td>2028/29</td> <td>78</td> <td>Clowes</td> <td>1</td> </tr> <tr> <td>6</td> <td>2029/30</td> <td>78</td> <td>Clowes</td> <td>1</td> </tr> <tr> <td>7</td> <td>2030/31</td> <td>78</td> <td>Clowes</td> <td>1</td> </tr> <tr> <td>8</td> <td>2031/32</td> <td>78</td> <td>Clowes</td> <td>1</td> </tr> </tbody> </table>	<u>Year</u>	<u>Year</u>	<u>No of Homes Delivered</u>	<u>Landowner</u>	<u>Phase</u>	1	2024/25	0		1	2	2025/26	0		1	3	2026/27	0		1	4	2027/28	69	Clowes	1	5	2028/29	78	Clowes	1	6	2029/30	78	Clowes	1	7	2030/31	78	Clowes	1	8	2031/32	78	Clowes	1
<u>Year</u>	<u>Year</u>	<u>No of Homes Delivered</u>	<u>Landowner</u>	<u>Phase</u>																																											
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		9	2032/33	85	Clowes; Dale, McManus, LCC; Leithards, Stark	1/2
		10	2033/34	79	Clowes; Dale, McManus, LCC; Leithards, Stark	2
		11	2034/35	79	Clowes; Dale, McManus, LCC; Leithards, Stark	2
		12	2035/36	79	Clowes; Dale, McManus, LCC; Leithards, Stark	2
		13	2036/37	79	Clowes; Dale, McManus, LCC; Leithards, Stark	2
		14	2037/38	79	Clowes; Dale, McManus, LCC; Leithards, Stark	2
		15	2038/39	79	Clowes; Dale, McManus, LCC; Leithards; Stark	2
		16	2039/40	85	Clowes; Dale, McManus, LCC; Leithards; Stark	2/3
		17	2040/41	78	Dale, McManus, LCC; Leithards	3
		18	2041/42	78	Dale, McManus, LCC; Leithards	3
		19	2042/43	78	Dale, McManus, LCC; Leithards	3
		20	2043/44	78	Dale, McManus, LCC; Leithards	3
		21	2044/45	78	Dale, McManus, LCC; Leithards	3
		22	2045/46	78	Dale, McManus, LCC; Leithards	3

Ref	Inspectors Question	Hyndburn Borough Council's Response			
	23	2046/47	85	Dale, McManus, LCC; Leithards; RSPCA	3/4
	24	2047/48	78	RSPCA	4
	25	2048/49	78	RSPCA	4
	26	2049/50	82	RSPCA	4
	Total		1816		

DISTRIBUTION OF DEVELOPMENT & COMMUNITY FACILITIES

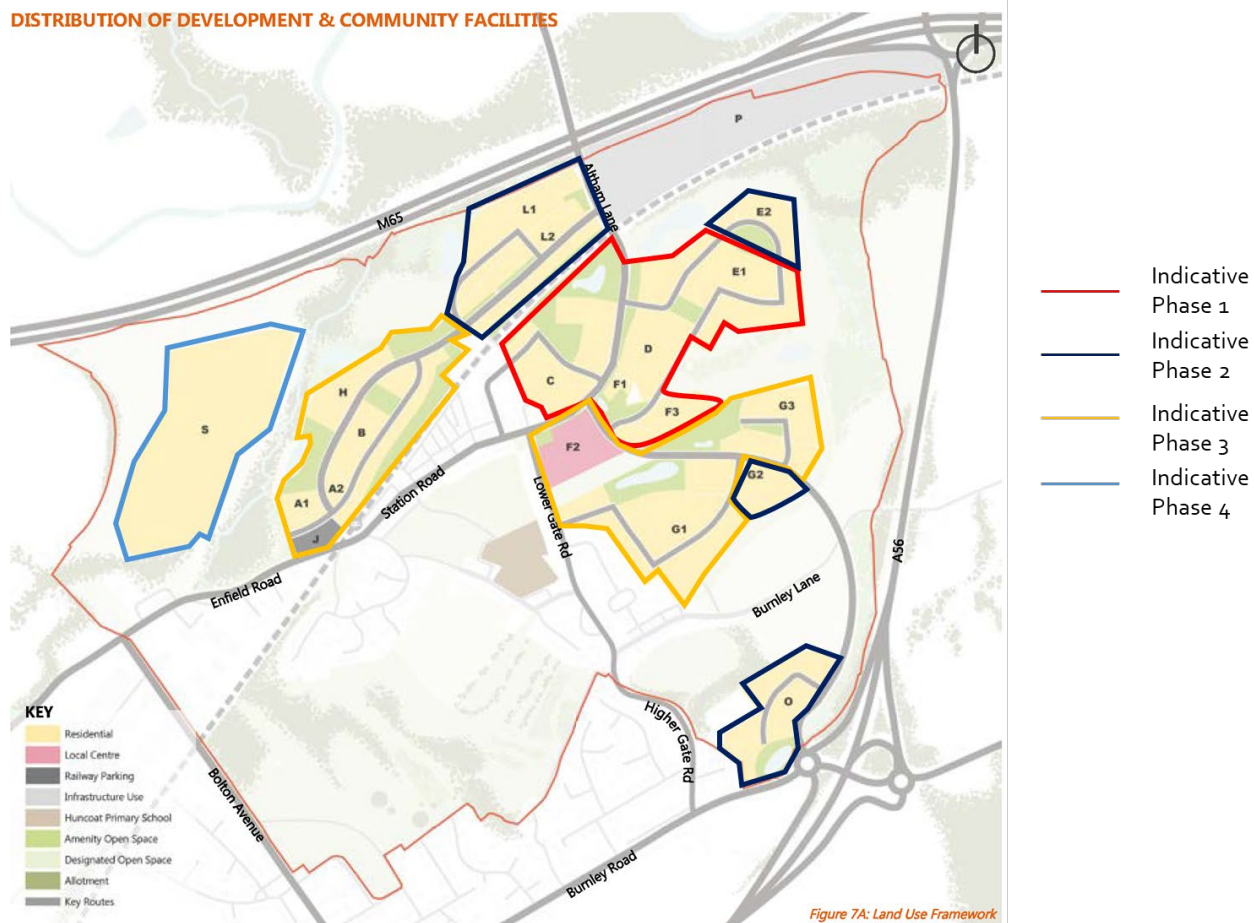


Figure 1: HGV Indicative phasing map (taken from the HGV Stage 3 Masterplan Framework & Infrastructure Delivery Strategy)

IQ11c

Some initial viability work has been undertaken as part of the Masterplan. It is clear that there are a number of unknowns in

Further assessment of abnormal costs has been undertaken on both the former Power Station site and the former Colliery site.

Ref	Inspectors Question	Hyndburn Borough Council's Response
	<p>terms of costs in particular the extent of contamination on the former Power Station site and Colliery and likely abnormal costs. Has any more recent assessment been undertaken.</p>	<p>For the former Power Station site both an abnormals report and an abnormals cost report have been prepared in 2020 by Campbell Reith and Allen Dadswell respectively. This was used to fix the grant funding contribution towards remediating the site i.e. £12,069,756 including inflation. McDermott Homes are currently carrying out further investigations in relation to the Power Station site but no further information has been provided at this time. However, McDermott Homes are confident that this site is viable with the grant available.</p> <p>For the former Colliery site, Brownfields Solutions Ltd carried out a site investigations report on behalf of Gleeson Homes in September 2021. This was used to fix the grant funding contribution towards remediating the site i.e. £5,601,254 including inflation. The house builders currently looking at this site indicate the site is viable with this level of funding.</p> <p>As these reports are not owned by the Council, we are unable to provide copies of these reports currently. If required, we can request that these reports are shared by the developers.</p>
<p>IQ11d</p>	<p>The Masterplan concludes that HGV is unviable without grant funding and quotes a figure of up to £25 million. I understand that Homes England are contributing £30m to bring the village forward. Can the Council please provide further details of this. Is an exploration of further grant funding required and is this being pursued.</p>	<p>Having satisfied Homes England on viability and delivery, the Council has entered into a grant funding agreement with Homes England for £29,897,722 for infrastructure funding for Huncoat Garden Village from the Government's Brownfield. Infrastructure and Land fund (BIL). The funding must be spent by the end of March 2028. The funding is for the following specific items:</p> <ul style="list-style-type: none"> • A new 1.1km residential relief road connecting Huncoat Garden Village directly with the A56. • Land acquisition by the Council to enable delivery of the above road • Brownfield land remediation on the former Power Station and Colliery sites • A contribution towards improvements for junction 8 on the M65 motorway <p>The overall objection of the funding is to support delivery of 1816 new homes at Huncoat Garden Village. This is considered viable and deliverable with the grant funding as described above.</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
		<p>Costs exceeding the circa £30m grant award are expected to be met from house builders as part of their development costs, s106 agreements, etc. No further grant funding requirement is necessary or expected and therefore no further funding is being pursued.</p>
<p>IQ11e</p>	<p>National Highways have raised concern about the impact of the development on J8 of the M65. Mitigation works are required which currently have no funding identified. I note that discussions with National Highways are ongoing and a SoCG is to be prepared. I would be grateful for an update on the position. Is there an understanding of how much development at the Garden Village could come forward before the M65 junction improvements are required?</p>	<p>The Council are in ongoing discussion with National Highways and Lancashire County Council (LCC) on the required mitigation for J8 of the M65. The council are preparing a SoCG which will set out the full agreements. Details of these recent discussions are set out in a correspondence from National Highways to HBC and this is available in Appendix 5 (Ref: H007).</p> <p>HBC are in the process of signing a Section 274 agreement with National Highways which will see the Council transfer £2,192,500 to National Highways as a 50% contribution towards J8 improvements. This agreement will allow for this funding to be subsequently transferred to and used by LCC to support potential mitigation at the Shuttleworth Mead Junction to ensure that mitigation at J8 is effective. The date that this funding would need to be spent by is 2032.</p> <p>National Highways are bidding for funding for the J8 improvements through the Road Investment Strategy 3 and this is expected to be announced in December 2025 due to delays resulting from the government spending review.</p> <p>National Highways are currently undertaking modelling work to see how many new homes can come forward before the junction improvements are required. We can provide an update on this when the modelling has been completed.</p>
<p>IQ11f</p>	<p>Policy SP2 permits the first phase of development at HGV to be implemented before the completion of a Relief Road (437 dwellings). What progress is being made to secure its delivery? Is it anticipated that the</p>	<p>HBC is delivering the proposed, new relief road, supported by the BIL grant award of up to £6,671,005. A full planning application was submitted at the end of March, with a view to achieving planning consent by the end of July 2025. In the meantime, following a tender exercise, the Council has appointed a contractor to construct the new road.</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
	development alone would be able to fund this new route, or would additional sources of funding be required?	
IQ11g	Policy SP2 requires the extension of Huncoat Primary School. I understand discussions about this are ongoing with the Education Authority as they have suggested a new school may be required on the Garden Village site. An update on the position would be helpful.	<p>HBC's position is that a new school will not be required as part of the Huncoat Garden Village. The Council believe that the required uplift can be met through a two-form entry expansion to the current Huncoat Primary School alongside need potentially being met within the wider Accrington PPA. This is an area of disagreement with the Education Authority.</p> <p>The discussions with the Education Authority up until the submission of the Local Plan are set out in document HBC1.007j and this includes an agreement on required student provision based on the housing mix set out in the submission Local Plan. There is an agreement that this requirement is 254 places which would require 1.2 FTE. The Council acknowledges that 0.5FTE are not provided therefore any extra capacity would require 2FTE.</p> <p>HBC believe that the required expansion can be met at the existing Huncoat Primary School. HBC have had discussions with the academy trust which runs the school and they have indicated a willingness to expand up to a 3FTE school. A copy of their response is below:</p> <p><i>"Following on from today's meeting I would like to tell you where LET Education Trust stands in terms of the matters for discussion.</i></p> <p><i>Currently we are open-minded over whether the school is expanded to a two or three form entry. We are absolutely against a 1.5 or 2.5 form entry as this has a huge impact on the delivery of the curriculum for the pupils affected. Mixed year groups following different curricula are extremely difficult to teach and often lead to gaps in learning. Smaller classes within the 1.5 or 2.5 intake within a year group are not cost effective and for this reason would not be considered.</i></p> <p><i>From our earliest discussions, our belief was that the existing site would be expanded on to the school playing fields, the Borough Council would give the school the playing fields that they own next to the school in return and we are still supportive of this. Huncoat is a village school and the traditional frontage with a new development behind will provide a recognisable landmark in the</i></p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
		<p><i>village. We have also recently invested considerable funds in the school replacing the boilers and full heating system and fully replacing and upgrading the nursery and reception teaching areas. This has taken place alongside the expansion of the nursery. We are not closed to the idea of a new-build school but it needs to make economic sense if this is the route to be followed and we would want full involvement in the planning and design of a new school.”</i></p> <p>Furthermore, in the wider Accrington PPA area in which Huncoat Primary school is located there is an expected requirement for 292 pupils, which equates to 1.4FE. Current evidence shows that the 5-year position in the Accrington PPA is showing a surplus of 760 pupil places. Therefore, it is believed that even in a scenario that the Huncoat Primary School could not expand to 2FE that the spaces could be provided across the wider Accrington PPA.</p> <p>Finally, HBC are also of the position that developing a new school in such close proximity to the current Huncoat Primary School would not be an ideal scenario considering the catchments of the schools.</p> <p>Therefore, the council considers that there is both opportunity to expand the current Huncoat Primary School and also use the surplus spaces in the wider Accrington PPA to meet the needs arising from the proposed Local Plan development and therefore a new school would not be required.</p> <p>The Council accept that the Education Authority would like to see flexibility in the policy to enable the potential for a new school, this is to ensure that there are contingencies for development. This is due to the Department of Education Guidance paragraph 47 which states:</p> <p><i>“We recommend that you identify a preferred and ‘contingency’ school expansion project in a planning obligation, or list all schools in the pupil planning area, if any of the identified options would address the needs from development and comply with the Section 106 tests. This will help you respond to changing circumstances and new information, such as detailed feasibility work leading you to abandon a preferred expansion project.”</i></p> <p>The positions of both HBC and the Education Authority are currently being worked up into a Statement of Common Ground. The timetable for this is indicated in response to IQ1.</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
IQ11h	<p>Policy SP3 which relates to Planning Obligations states that the Council may consider a separate delivery mechanism for HGV. What is the justification for this and what could it entail?</p>	<p>Policy SP3 allows for a potential separate delivery mechanism for the Huncoat Garden Village using equalisation methods for determining S106 contributions. The justification for this is to ensure that all landowners make fair contributions to the provision of new infrastructure across the area to ensure delivery, and to contribute to future management and maintenance where relevant. This ensures that infrastructure requirements are not triggered on individual developers when there is a cumulative impact across the masterplan area.</p>
Housing Land Supple - Deliverability		
IQ12	<p>Whilst I note there is some evidence with regard to the above in the Background Paper on Site Assessment and Selection (HBC8.003) it does not go far enough to enable me to come to a judgment on whether sites in the five year supply are deliverable and whether sites contributing to supply from years 6 onwards are developable.</p> <p>For each housing allocation and any site not allocated but assumed to contribute towards the five year supply, I ask the Council to prepare a schedule setting out for each site, the total</p>	<p>In order to inform its response, the Council has begun this process and intends to get in contact with the developers and landowners to obtain the most recent information. HBC is committed to responding by the end of June and asks the Inspector to allow the additional time to conclude this exercise.</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
	<p>dwelling capacity, anticipated completions in the plan period and beyond, the anticipated delivery trajectory, ownership and availability, developer interest, viability, infrastructure provision and planning permissions in place.</p>	
<p>Strategic Housing Land Availability Assessment (SHLAA)</p>		
<p>IQ13</p>	<p>The SHLAA was undertaken in 2016 and assesses housing potential from 2016-2033. Why is it still appropriate and justified to rely on its findings?</p>	<p>The SHLAA undertaken in 2016 remains appropriate and justified as part of the evidence base. The SHLAA was developed through a robust and methodological process in line with both the NPPF and PPG, ensuring that the identified sites met clear criteria for their deliverability and developability. The SHLAA process identified a surplus of sites beyond the required number of houses identified under the standard method required by the 2023 NPPF for HBC.</p> <p>The SHLAA provides as a baseline document for assessing housing options. As the 2016 document outlined a potential surplus of land compared to the standard method required, these sites have been taken forward and assessed through further documentation including the Integrated Impact Assessment (IIA). HBC has also continued to liaise with developers and site owners through monitoring of sites and their potential deliverability and availability. HBC has also continued to undertake further work to identify sites including a further Call for Sites process in 2020.</p> <p>HBC accept that the SHLAA only covers the period to 2033, however ongoing site-specific discussions on deliverability of sites show that the Council has both a 5 year supply and a 6-10 years supply of sites. Therefore, we would consider that this mitigates the impact of the shortened time period that this assesses. HBC are committed to undertaking a full review of the Local Plan every 5 years to ensure the plan is up to date and consider that an updated SHLAA can be prepared as part of this process.</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response																																																																																										
		While the Council accepts that the document may be dated, it is considered that the approach undertaken is appropriate and justified based on the methodology, housing number, assessment of sites and consideration of proportionality of resources available.																																																																																										
Windfall Sites																																																																																												
IQ14	The Background Paper No. 1: Housing Land Requirement and Supply Position (HBC8.001) in paragraph 3.9 considers a small sites allowance. NPPF72 states that where an allowance is made for windfall sites as part of anticipated supply there should be compelling evidence that they will provide a reliable source of supply. Whilst Table 5 of the document sets out the number of dwellings delivered on small sites, it looks only at the net capacity of sites and dwellings completed. It does not set out the number of windfall completions each year over at least the last 10 years. A further table should be prepared to provide this evidence. It should also be explained why the Council considers this trend will continue	<p>Table 6 has been prepared in response to this question; it shows housing delivery on sites which have delivered 4 dwellings or less. Unlike Table 5 of the Background Paper, it shows the delivery on an annual basis and covers the latest ten years (2013/14 to 2023/24).</p> <p>Table 6: Past delivery on sites with 4 or less dwellings</p> <table border="1" data-bbox="797 632 2065 1383"> <thead> <tr> <th data-bbox="797 632 1249 751">Completions on sites of 4 dwellings or less over the last 10 years (2013/14 – 2023/24)</th> <th data-bbox="1249 632 1368 751">Total 1 bed</th> <th data-bbox="1368 632 1496 751">Total 2 bed</th> <th data-bbox="1496 632 1630 751">Total 3 bed</th> <th data-bbox="1630 632 1783 751">Total 4 bed</th> <th data-bbox="1783 632 2065 751">Sites with 4 or less dwellings</th> </tr> </thead> <tbody> <tr><td>2013/14</td><td>10</td><td>10</td><td>0</td><td>8</td><td>28</td></tr> <tr><td>2014/15</td><td>19</td><td>10</td><td>3</td><td>8</td><td>40</td></tr> <tr><td>2015/16</td><td>13</td><td>0</td><td>0</td><td>4</td><td>17</td></tr> <tr><td>2016/17</td><td>15</td><td>6</td><td>0</td><td>8</td><td>29</td></tr> <tr><td>2017/18</td><td>13</td><td>2</td><td>0</td><td>0</td><td>15</td></tr> <tr><td>2018/19</td><td>14</td><td>2</td><td>0</td><td>0</td><td>16</td></tr> <tr><td>2019/20</td><td>7</td><td>2</td><td>0</td><td>0</td><td>9</td></tr> <tr><td>2020/21</td><td>1</td><td>0</td><td>3</td><td>8</td><td>12</td></tr> <tr><td>2021/22</td><td>7</td><td>2</td><td>5</td><td>4</td><td>18</td></tr> <tr><td>2022/23</td><td>1</td><td>0</td><td>4</td><td>0</td><td>5</td></tr> <tr><td>2023/24</td><td>15</td><td>8</td><td>0</td><td>0</td><td>23</td></tr> <tr><td>Totals</td><td>115</td><td>42</td><td>15</td><td>40</td><td>212</td></tr> <tr><td colspan="5" style="text-align: right;">Average over 10 years</td><td>19.3</td></tr> <tr><td colspan="5" style="text-align: right;">Average figure x 15 years plan period</td><td>289.1</td></tr> </tbody> </table>	Completions on sites of 4 dwellings or less over the last 10 years (2013/14 – 2023/24)	Total 1 bed	Total 2 bed	Total 3 bed	Total 4 bed	Sites with 4 or less dwellings	2013/14	10	10	0	8	28	2014/15	19	10	3	8	40	2015/16	13	0	0	4	17	2016/17	15	6	0	8	29	2017/18	13	2	0	0	15	2018/19	14	2	0	0	16	2019/20	7	2	0	0	9	2020/21	1	0	3	8	12	2021/22	7	2	5	4	18	2022/23	1	0	4	0	5	2023/24	15	8	0	0	23	Totals	115	42	15	40	212	Average over 10 years					19.3	Average figure x 15 years plan period					289.1
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		<p>The Background Paper and associated trajectory give a small sites allowance of 280 dwellings which is divided over the plan period in the housing trajectory. The figures shown in Table 6 show a similar average delivery over the last ten years (19.3 dpa), if this figure is multiplied by 15 years it shows an expected delivery of around 289 dwellings, which is in line with the Background Paper.</p> <p>It should be noted that HBC have taken a precautionary view on this. There is an argument that delivery may have been hampered or delayed by Covid-19, no allowance has been made for this. In addition, the relaxation of the rules around permitted development are likely to mean that less small sites are coming forward which require planning permission and so will not be counted in these figures. This could skew delivery figures in recent years and the number of dwellings actually delivered could be much higher.</p> <p>Overall HBC believes that a small sites allowance of 280 is proportionate and will be delivered within the plan period.</p>
Small and Medium Sites		
IQ15	<p>NPPF70 requires local authorities to identify through the development plan, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Can the Council confirm whether this can be achieved and if not provide strong reasons why not.</p>	<p>The Local Plan has six proposed site allocations which are under one hectare. These are capable of delivering around 119 dwellings. In addition, based on previous delivery, there is a small sites allowance of 20 dwellings per year included in the Council's housing trajectory; this equates to 280 dwellings in the plan period (see housing topic paper - Ref HBC8.001_BP1). When these are combined, it would represent a delivery of 16% of houses on sites no larger than 1 hectare.</p> <p>Please take note that the answer to IQ14 above, includes additional information on how the small sites allowance was calculated.</p> <p>It should also be noted that there are two additional sites for which we have estimated a net deliverable area of 1.02 hectares (H2 and H9). Whilst they are marginally over one hectare, if a pragmatic approach was taken and these dwellings were to be included in the small sites calculation, HBC would be providing 19% of its housing target on small sites.</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
Older Persons dwelling requirements		
IQ16	<p>Policy SP11 considers the range of housing needed in the Borough including that for older persons. Table 3 on page 61 of the Plan provides an estimate of the needs for this type of housing taken from the Housing and Economic Needs Assessment (HENA). This projects the requirement to 2036 not 2040. What would the need be to the end of the Plan period and how does the Plan intend to meet this need?</p>	<p>In order to inform its response, HBC has requested further work to be undertaken by our consultants who undertook the HENA assessment. HBC is committed to responding by the end of June and asks the Inspector to allow the additional time to conclude this exercise.</p>
Gypsy and Traveller Accommodation		
IQ17	<p>The GTAA was prepared in 2019. Can the Council explain why they consider this document to be sufficiently up to date and robust to provide evidence of need in the Borough. Is extrapolating its findings for the period 2018-2036 to provide an estimate of need over the Plan period to 2040, an appropriate approach to take?</p>	<p>HBC considers that the GTAA remains robust and credible as part of the evidence base for the purpose of identifying need in the borough. The GTAA was produced in accordance with the NPPF and PPG following established methodology, including primary survey work, stakeholder engagement and site assessments. This includes consideration of the amended definitions as part of the Smith case.</p> <p>While the assessment is from 2019, the projections made in the assessment are based on demographic trends, household formation rates and patterns of movement that are unlikely to have significantly changed of the time period and reflect a limited extended period.</p> <p>Therefore, extrapolating this information for the remaining four years is considered to be a proportionate and pragmatic approach. This limited risk is further mitigated by HBC's commitment</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
		to review the plan every 5 years and continue to undertake annual monitoring, which limits the impact of this extrapolation at the end of the plan period.
IQ18	<p>Table 3 of the Gypsy and Traveller Background Paper (HBC8.005) sets out a cultural need of 74 pitches over the Plan period. A total of 21 pitches have been provided since the start of the Plan period in 2021, leaving a need for 53 pitches to be met through five site allocations. Policy SP12 is not effective in that it does not clearly set out the identified need for gypsy and traveller pitches over the plan period and how it will be met. The Council may wish to consider a Main Modification to the policy and supporting text. Can the Council also advise if a five-year supply would be demonstrated on the adoption of the Plan.</p>	<p>Modifications are suggested to Policy SP12 and the supporting text as set out at Appendix 6 (examination reference H008).</p> <p>The Council considers that it will be able to demonstrate a five-year supply of deliverable sites for Gypsies and Travellers upon adoption of the Local Plan. This position is supported by the analysis contained within Background Paper HBC9.001a (Background Paper No. 5: Gypsy and Traveller Site Provision), which sets out an assessment of the proposed site allocations, delivery assumptions, and evidence supporting the identified supply.</p> <p>Specifically, the Background Paper identifies three key proposed allocations that are expected to contribute to meeting the identified need for Gypsy and Traveller accommodation over the Plan period. In the short term, two of these allocations—GT1 (Land at Spring Vale, Accrington) and GT2 (Crossland Street, Accrington)—are considered deliverable within the first five years of the Plan. GT1 is proposed to deliver 9 pitches, while GT2 is expected to deliver 4 pitches. The Background Paper concludes that there is a reasonable prospect that both sites will come forward in the short term, based on site availability, ownership, and alignment with planning policy.</p> <p>In addition to these two sites, a third allocation—GT4 (Land off Enfield Road, Huncoat)—is anticipated to come forward between years 6 to 10 of the Plan period and is proposed to deliver 15 pitches. The delivery of this site would contribute to meeting the medium-term accommodation needs of the Gypsy and Traveller community within the borough. The indicative Schedule of Delivery for these allocations is set out in Table 3 of Background Paper HBC9.001a, which also takes into account existing planning permissions granted since 2019/20.</p> <p>It is important to note that the projected supply outlined in the Background Paper does not include any allowance for windfall sites. This approach reflects the relatively short timeframe available for analysis and the limited number of permissions granted for Gypsy and Traveller</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
		<p data-bbox="795 231 2072 502">pitches in previous years, which does not provide sufficient data to establish a reliable historical trend. However, the Council acknowledges that while windfall sites are not formally relied upon to meet the identified need, they may play a supporting role during the Plan period. In particular, it is anticipated that the number of small, underused, or vacant sites within Hyndburn's urban areas could lead to the emergence of suitable windfall opportunities for Gypsy and Traveller accommodation. These would provide an additional buffer to support delivery and resilience in meeting future needs.</p> <p data-bbox="795 558 2072 678">Overall, the Council is confident that the combined effect of the identified allocations, existing permissions, and likely windfall contributions will ensure a robust supply of pitches over both the short and longer term, in line with national planning policy and the needs evidenced by the GTAA.</p>
Whole Plan Viability		
IQ19	<p data-bbox="313 774 750 1284">HBC2.006 the Viability report concludes in paragraph 12.85 that residential development on brownfield sites is generally shown to be unviable even without affordable housing. It is recommended that the affordable housing requirement on such sites should be set at 10%. However, the Plan requires 20% for all development, unless it can be demonstrated that a scheme would be unviable.</p> <p data-bbox="313 1284 750 1380">Bearing in mind the evidence, is this approach justified? Should a</p>	<p data-bbox="795 774 2049 1013">The Viability Study (HBC2.006) undertaken in 2021 considered the impact of a requirement for 20% affordable housing on typical development costs in the Borough and on viability. It broadly concluded that whilst the requirement does impact on viability, the impacts were variable depending on the location of the site, the size of development and whether the site was greenfield or previously developed. Where viability was marginal, it could be increased, for example by reducing the affordable housing provision to 10%.</p> <p data-bbox="795 1029 2049 1268">HBC acknowledge these findings but consider that economic circumstances may alter during the plan period and in addition grant assistance may assist the delivery of higher numbers of affordable homes on sites where viability is an issue. As such, 20% is considered to remain an appropriate starting point for affordable housing requirements in this plan. Policy SP10 refers to the fact that affordable housing provision will be sought 'where viable', meaning that there is flexibility built into the policy to ensure delivery of sites.</p> <p data-bbox="795 1284 2049 1388">HBC consider that the requirement for affordable housing (79 households per annum needs not being met by the market) highlights a pressing need to ensure the maximum delivery of affordable homes where there is potential to achieve this and therefore setting the threshold too low may</p>

Ref	Inspectors Question	Hyndburn Borough Council's Response
	lower contribution also be required in lower value areas?	stifle supply of this need on sites which may be able to achieve this in both the current and future housing market.
Monitoring and Implementation		
IQ20	Section 13 of the Plan states that a Monitoring and Implementation Strategy will be prepared to monitor the effectiveness of the Plan. Can the Council clarify when this will be prepared and whether it will form an Appendix to the Plan.	The Monitoring and Implementation Strategy will be prepared as an appendix to the Local Plan. This will be submitted to the Inspector by the end of June.
Appendix A - Glossary		
IQ21	I suggest that the Council check the definitions in the Glossary to ensure they are consistent with national planning policy (including Annex 2 to NPPF February 2025).	A revised glossary has been produced as requested and is included within this response available at Appendix 7, (Examination Ref. H009). However, given that this Local Plan is being examined under the 2023 NPPF and policies contained within, the Council request clarification from the Inspector as to why this request has been made.
Main Modifications		
IQ22	In accordance with section 20(7C) of the Planning & Compulsory Purchase Act 2004 (as amended), can the Council confirm whether they wish me to recommend any Main Modifications necessary to	Yes, please see schedule of modifications (HBC1.006) – a revised version of which is provided in response to IQ23 in Appendix eight (Ref. H010).

Ref	Inspectors Question	Hyndburn Borough Council's Response
	rectify matters that make the Plan unsound.	
IQ23	<p>HBC1.006 sets out a schedule of 54 proposed minor amendments to the submitted Plan. It appears to me that some of these are not minor or additional modifications but are Main Modifications. Can the Council please prepare separate schedules of Main Modifications and Additional Modifications that are considered necessary at this stage to respond to representations, SoCG etc. These can then be considered through the examination process.</p>	<p>A revised version of this document (HBC1.006) has been produced which divides the proposed modifications into minor (4) and major modifications (50). This document accompanies this response in Appendix 8 (Examination Ref H010). HBC respectfully ask that these changes be taken into account during examination process.</p>

APPENDICIES

APPENDIX ONE: DEVELOPABLE CONSTRAINTS OF EMPLOYMENT SITES EMP3 EMP4 EMP5 AND EMP6

See separate document (Examination Reference H003).

APPENDIX TWO: ENVIRONMENT AGENCY APPROVED FLOOD RISK MAPS

See separate document (Examination Reference H004).

APPENDIX THREE: EMPLOYMENT LAND SUPPLY OVER THE PLAN PERIOD

See separate document (Examination Reference H005).

APPENDIX FOUR: HUNCOAT DESIGN CODE - FINAL DRAFT REPORT

See separate document (Examination Reference H006).

APPENDIX FIVE: NATIONAL HIGHWAYS CORRESPONDENCE TO HBC - COVERING LETTER 25TH APRIL 2025 (REDACTED)

See separate document (Examination Reference H007).

APPENDIX SIX: PROPOSED MODIFICATIONS TO SP12 IN RESPONSE TO IQ18

See separate document (Examination Reference H008).

APPENDIX SEVEN: ABBREVIATIONS REFLECTING NPPF 2024

See separate document (Examination Reference H009).

APPENDIX EIGHT: PROPOSED-SCHEDULE-OF-AMENDMENTS-TO-THE-PUBLICATION-LOCAL-PLAN-2021-2040_VERSION 2

See separate document (Examination Reference H0010). This document is an updated version of HBC1.006 including amendments requested by the Inspector.