

Submitted to Central Lancashire Local Plan Regulation 19 Representation Period  
Submitted on 2025-04-14 17:37:35

Part A: Personal Details

1 What is your title?

Prefer not to say

2 What is your first name?

First Name:

Messrs Rankin, Patel and Briggs

3 What is your last name?

Last name:

Messrs Rankin, Patel and Briggs

4 What is your job title? (if relevant to the representation)

Job title:

5 What is your organisation? (if relevant to the representation)

Organisation:

[REDACTED]

6 What Authority do live/work in?

[REDACTED]

7 What is your address?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 What is your email address?

Email:

[REDACTED]

Part B: Representation

9 Which part of the Central Lancashire Local Plan would you like to make a representation about?

Chapter 7: High Quality Environment (EN1-EN19)

Chapter 3: Vision, Objectives and Spatial Strategy

10 Which policy would you like to make a representation for?

SS2: Settlement Hierarchy

SS2: Settlement Hierarchy

27 Do you consider the Central Lancashire Local Plan is:

Spatial Vision: Soundness/legal/DtC - Legally Compliant:

Yes

Spatial Vision: Soundness/legal/DtC - Sound (If you check 'No', please also confirm below which of the 'tests' it fails to meet):

No

Spatial Vision: Soundness/legal/DtC - a) Positively prepared:

No

Spatial Vision: Soundness/legal/DtC - b) Justified:

No

Spatial Vision: Soundness/legal/DtC - c) Effective:

No

Spatial Vision: Soundness/legal/DtC - d) Consistent with national policy:

No

Spatial Vision: Soundness/legal/DtC - Complies with the Duty to Cooperate:

No

28 Please give details of why you consider the Central Lancashire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (i.e., if objecting on legal grounds then please quote the specific law that the Central Lancashire Local Plan does not conform with). If you wish to support the legal compliance or soundness of the Central Lancashire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy SS2: Legal Compliance:

The Central Lancashire Local Plan is unsound in respect to Policy SS2-Spatial Strategy in that insufficient weight is given to Tier 4 settlements such as Grimsargh and the role that new development can play in supporting local services and facilities which are often under strain in the Rural Local Service Centres.

Para. 3.20 notes that Rural Local Service Centres serve their own residents and nearby villages with local services but it should also be recognised that some development is essential and will be encouraged to support these very same services.

The alternative is that it is highly unlikely that existing populations will be sufficient to support the existing range of services when new development in adjoining built up areas will continue to draw trade away and the inevitable will be that local services and facilities close down. This in turn will undermine local communities and result in greater car travel and congestion.

Policy SS2 should therefore recognise that Tier 4 settlements should allow some expansion and new development to maintain their existing services and facilities.

29 Please set out the modification(s) you consider necessary to make the Central Lancashire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. (Please note that non-compliance with the duty to co-operate is incapable of modification at Examination). You will need to say why each modification will make the Central Lancashire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SS2: Modifications:

Policy SS4 should be amended to include the sentence:

Additional development will be allowed where this will allow sufficient population growth to support local services and facilities.

30 Do you wish to make a representations about a different section of the Plan?

Yes

## Chapter 4: Balanced Housing Market

47 Which policy would you like to make a representation for?

HS7: Affordable Housing

HS1 (Strategic Policy): Scale of Housing Growth and Distribution of Housing Requirements

48 Do you consider the Central Lancashire Local Plan is:

Spatial Vision: Soundness/legal/DtC - Legally Compliant:

Yes

Spatial Vision: Soundness/legal/DtC - Sound (If you check 'No', please also confirm below which of the 'tests' it fails to meet):

No

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No

Spatial Vision: Soundness/legal/DtC - c) Effective:

No

Spatial Vision: Soundness/legal/DtC - d) Consistent with national policy:

No

Spatial Vision: Soundness/legal/DtC - Complies with the Duty to Cooperate:

No

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Policy HS1: Legal Compliance:

The Central Lancashire Local is regarded as being unsound for the following reasons:

The plan fails to provide sufficient land for housing development, particularly in respect to Preston. Policy HS4 has insufficient housing land allocated to meet the needs of the City.

As such the plan should allocate additional land to address the shortfall. Preston Council has recently acknowledged that it does not have a Five Year Housing Land Supply despite having a new Local Plan at an advanced stage of preparation and it is therefore at risk of planning by appeal if sufficient land in suitable locations is not identified for development.

Failure to provide sufficient land for housing not only undermines the soundness of the Local Plan but is in direct conflict with the new Standard Method for the calculation of housing requirements established through the National Planning Policy Framework [NPPF][December 2024].

In particular the overall housing land identified does not meet 80% of the local housing need established in December 2024 and is therefore in conflict with para. 234(a) of the NPPF.

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HS1: Modifications:

Policy HS1 should be amended to increase the housing requirement for Preston to meet the required 80% of that identified in the new standard method.

This in turn will require the identification of new sites to be allocated for housing development.

51 Do you wish to make a representations about a different section of the Plan?

Yes

HS5: Open Space and Playing Pitch Requirements in New Housing Developments

52 Do you consider the Central Lancashire Local Plan is:

Spatial Vision: Soundness/legal/DtC - Legally Compliant:

Yes

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No

Spatial Vision: Soundness/legal/DtC - c) Effective:

No

Spatial Vision: Soundness/legal/DtC - d) Consistent with national policy:

No

Spatial Vision: Soundness/legal/DtC - Complies with the Duty to Cooperate:

No

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Policy HS5: Legal Compliance:

Policy HS5 is unsound because it fails to acknowledge that the delivery of new, strategic areas of public open space requires the support of significant new housing allocations.

Land at Preston Road, Grimsargh is one such example where the opportunity to provide a new, strategic area of open space which will benefit existing and future residents of Grimsargh.

The policy should therefore state that where new open space is proposed that goes beyond policy requirements, the plan will support their development.

54 Please set out the modification(s) you consider necessary to make the Central Lancashire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. (Please note that non-compliance with the duty to co-operate is incapable of modification at Examination). You will need to say why each modification will make the Central Lancashire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

HS5: Modifications:

Policy HS5 should be modified to include reference for the need for allocations to support the provision of Strategic Areas of Public Open Space and that developments that go beyond the policy requirements will be supported.

55 Do you wish to make a representations about a different section of the Plan?

Yes

## HS7: Affordable Housing

60 Do you consider the Central Lancashire Local Plan is:

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Yes

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No

Spatial Vision: Soundness/legal/DtC - b) Justified:

No

Spatial Vision: Soundness/legal/DtC - c) Effective:

No

Spatial Vision: Soundness/legal/DtC - d) Consistent with national policy:

No

Spatial Vision: Soundness/legal/DtC - Complies with the Duty to Cooperate:

No

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Policy HS7: Legal Compliance:

Policy HS7 is not sound because it does not give sufficient weight to the requirements for affordable housing in Tier 4 settlements to be supported through market housing development.

35% is the threshold for Tier 4 settlements which is a significant proportion of an overall development and can test viability. In order to facilitate such a proportion of affordable housing it should be recognised that developments need to be of a reasonable scale to ensure delivery is viable.

62 Please set out the modification(s) you consider necessary to make the Central Lancashire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. (Please note that non-compliance with the duty to co-operate is incapable of modification at Examination). You will need to say why each modification will make the Central Lancashire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

HS7: Modifications:

The supporting text to Policy HS7 should be revised to state that support will be given for developments in Tier 4 settlements of a larger scale in order to be able to provide 35% affordable housing.

63 Do you wish to make a representations about a different section of the Plan?

Yes

## Chapter 6: Healthy and Inclusive Communities

125 Which policy would you like to make a representation for?

HC5: Provision of New Open Space, Sport and Recreation Facilities

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142 Do you consider the Central Lancashire Local Plan is:

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No

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No

Spatial Vision: Soundness/legal/DtC - c) Effective:

No

Spatial Vision: Soundness/legal/DtC - d) Consistent with national policy:

No

Spatial Vision: Soundness/legal/DtC - Complies with the Duty to Cooperate:

No

143 Please give details of why you consider the Central Lancashire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (i.e., if objecting on legal grounds then please quote the specific law that the Central Lancashire Local Plan does not conform with). If you wish to support the legal compliance or soundness of the Central Lancashire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy HC5: Legal Compliance:

Policy HC5 is unsound because it does not provide explicit support for larger developments that provide open space in excess of local plan requirements. The benefits of open space are well recognised and where provision is made that would mean that it did not simply serve the needs of future residents but also served the existing residents of a settlement, this will be regarded as a material consideration in the determination of applications for residential development.

144 Please set out the modification(s) you consider necessary to make the Central Lancashire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. (Please note that non-compliance with the duty to co-operate is incapable of modification at Examination). You will need to say why each modification will make the Central Lancashire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

HC5: Modifications:

Policy HC5 should be revised to state that where provision of new open space is proposed in excess of local plan requirements, this will be taken as a material consideration in favour of planning applications for residential development.

145 Do you wish to make a representations about a different section of the Plan?

Yes

## Chapter 7: High Quality Environment

154 Which policy would you like to make a representation for?

EN18: Areas of Separation

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223 Do you consider the Central Lancashire Local Plan is:

Spatial Vision: Soundness/legal/DtC - Legally Compliant:

Yes

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No

Spatial Vision: Soundness/legal/DtC - a) Positively prepared:

No

Spatial Vision: Soundness/legal/DtC - b) Justified:

No

Spatial Vision: Soundness/legal/DtC - c) Effective:

No

Spatial Vision: Soundness/legal/DtC - d) Consistent with national policy:

No

Spatial Vision: Soundness/legal/DtC - Complies with the Duty to Cooperate:

No

224 Please give details of why you consider the Central Lancashire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (i.e., if objecting on legal grounds then please quote the specific law that the Central Lancashire Local Plan does not conform with). If you wish to support the legal compliance or soundness of the Central Lancashire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy EN18: Legal Compliance:

Policy EN18 is not sound because it fails to give sufficient recognition to those circumstances where development has been accepted in Areas of Separation and how such proposals will be considered. This is particularly clear from the Appeal decision at Garstang Road, Broughton [APP/N2345/W/23/3330709] where the Inspector concluded that as the proposed development did not take up a large part of the Area and would not see the merging of settlements, it would not undermine the function of the Area of Separation.

225 Please set out the modification(s) you consider necessary to make the Central Lancashire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. (Please note that non-compliance with the duty to co-operate is incapable of modification at Examination). You will need to say why each modification will make the Central Lancashire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

EN18: Modifications:

The supporting text to EN18 should explain in more detail how the policies of the Area of Separation will be applied with reference to Appeal APP/N2345/W/23/3330709.

226 Do you wish to make a representations about a different section of the Plan?

No

## Preston Site Allocations

275 Which site allocation would you like to make a representation for?

site allocation reference:

HS4.1

276 Do you consider the Central Lancashire Local Plan is:

Spatial Vision: Soundness/legal/DtC - Legally Compliant:

Yes

Spatial Vision: Soundness/legal/DtC - Sound (If you check 'No', please also confirm below which of the 'tests' it fails to meet):

Yes

Spatial Vision: Soundness/legal/DtC - a) Positively prepared:

Yes

Spatial Vision: Soundness/legal/DtC - b) Justified:

Yes

Spatial Vision: Soundness/legal/DtC - c) Effective:

Yes

Spatial Vision: Soundness/legal/DtC - d) Consistent with national policy:

Yes

Spatial Vision: Soundness/legal/DtC - Complies with the Duty to Cooperate:

Yes

277 Please give details of why you consider the Central Lancashire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (i.e., if objecting on legal grounds then please quote the specific law that the Central Lancashire Local Plan does not conform with). If you wish to support the legal compliance or soundness of the Central Lancashire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Preston site allocations: soundness/legal/DtC:

N/A

278 Please set out the modification(s) you consider necessary to make the Central Lancashire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. (Please note that non-compliance with the duty to co-operate is incapable of modification at Examination). You will need to say why each modification will make the Central Lancashire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Preston site allocations: modifications:

N/A

279 Do you wish to make another representation?

Yes

### Sites Not Proposed for Allocation

295 Which site allocation would you like to make a representation for? (Please insert the SHELAA reference for the site)

Sites Not Proposed for Allocation:

N/A - Unallocated Site

296 Do you consider the Central Lancashire Local Plan is:

Spatial Vision: Soundness/legal/DtC - Legally Compliant:

Yes

Spatial Vision: Soundness/legal/DtC - Sound (If you check 'No', please also confirm below which of the 'tests' it fails to meet):

No

Spatial Vision: Soundness/legal/DtC - a) Positively prepared:

No

Spatial Vision: Soundness/legal/DtC - b) Justified:

No

Spatial Vision: Soundness/legal/DtC - c) Effective:

No

Spatial Vision: Soundness/legal/DtC - d) Consistent with national policy:

No

Spatial Vision: Soundness/legal/DtC - Complies with the Duty to Cooperate:

No

297 Please give details of why you consider the Central Lancashire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (i.e., if objecting on legal grounds then please quote the specific law that the Central Lancashire Local Plan does not conform with). If you wish to support the legal compliance or soundness of the Central Lancashire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Sites Not Proposed for Allocation: soundness/legality/DtC:

The Central Lancashire Local is regarded as being unsound for the following reasons:

The plan fails to provide sufficient land for housing development, particularly in respect to Preston. Policy HS4 has insufficient housing land allocated to meet the needs of the City.

As such the plan should allocate additional land at Preston Road, Grimsargh as set out in the accompanying statement [emailed under separate cover]. Preston Council has recently acknowledged that it does not have a Five Year Housing Land Supply despite having a new Local Plan at an advanced stage of preparation and it is therefore at risk of planning by appeal if sufficient land in suitable locations is not identified for development.

Failure to provide sufficient land for housing not only undermines the soundness of the Local Plan but is in direct conflict with the new Standard Method for the calculation of housing requirements established through the National Planning Policy Framework [NPPF][December 2024].

In particular the overall housing land identified does not meet 80% of the local housing need established in December 2024 and is therefore in conflict with para. 234(a) of the NPPF.

However, the shortfall is relatively modest and therefore the allocation of the land at Preston Rd, Grimsargh may be sufficient in itself to make the plan sound. The allocation of the site would also help support local services and facilities which make Grimsargh a sustainable location for development.

If the site is not identified for development at this time, it should be brought forward at the earliest opportunity in the next plan for which work is expected to commence as soon as the current draft plan is adopted.

Furthermore, given the uncertainties with local Government reorganisation, sites such as this one with no technical constraints should be identified as being available early in any new plan period.

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Sites Not Proposed for Allocation: modifications:

The Plan should be revised to include Land at Preston Road, Grimsargh to provide additional housing land to meet the requirements of the area, both Preston and Central Lancashire as a whole. The justification for the allocation of the site and why the site is appropriate for housing development without undermining the Local Plan strategy or the identified Area of Separation set out in the accompanying statement [emailed under separate cover].

299 Do you wish to make another representation?

Yes

## Declaration

300 This is the final page of the Regulation 19 Consultation survey. After completing this page, your response will be submitted. If you wish to go back and make a representation on another part of the survey, please click 'go back' below.

Not Answered

301 If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

302 If you have answered 'yes' to the question above, wishing to participate in the hearing session(s), please outline why you consider this to be necessary:

why participation is necessary:

It is necessary to participate in the Hearing sessions in order to be able to fully discuss and debate the issues pertaining to the range of policies and the implications for housing allocations in Preston that arise from the policies identified.

303 By completing and submitting this representation, I agree to my name (and other relevant details necessary) and representation(s) being shared and made available for public viewing.

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304 If you wish to be contacted further at future stages of the Local Plan process and to be added to the Central Lancashire and/or district individual consultation databases, please select the relevant option below

Future stages on the Local Plan - I wish to be contacted at future stages of the Local Plan process and added to the Local Plan Consultation database for Central Lancashire:

Yes

Future stages on the Local Plan - I wish to be contacted about Planning Policy matters and added to the Chorley Consultation database.:

Yes

Future stages on the Local Plan - I wish to be contacted about Planning Policy matters and added to the South Ribble Consultation database.:

Yes

Future stages on the Local Plan - I wish to be contacted about Planning Policy matters and added to the Preston Consultation database.:

Yes