

Central Lancashire Local Plan Team

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Your ref:

Our ref: LCC/MH/CLLPR19/01

Date: 14 April 2025

Dear Central Lancashire partner local authorities

Central Lancashire Local Plan Regulation 19 Representation

Thank you for inviting Lancashire County Council to make comments to the Regulation 19 draft Central Lancashire Local Plan 2023-2041 ('the draft Local Plan'). This letter complements representations made separately by the county council on the draft Local Plan on the matters of flood management and public health.

As a partner to the preparation of the Central Lancashire Local Plan and joint member of the Central Lancashire Strategic Planning Joint Advisory Committee, the county council has and looks forward to continuing to play a full and active role in evidence gathering and policy formulation in support of the statutory responsibilities of the district local planning authorities, including duty to cooperate arrangements.

The county council is responsible for a series of strategic functions that are relevant and important to, being an influence on and also directly influenced by, the content and coverage of the draft Local Plan. Specifically on the matters of strategic growth and economic development, education and school place provision, and transport infrastructure and services, the county council has ongoing concerns with the adequacy and robustness of the evidence base and policy formulation presented in this version of the draft Local Plan.

The county council remains committed to continuing to work collaboratively with the three central Lancashire district local authorities in progressing the draft Local Plan to adoption. In support of this, there is ongoing work underway to compile, analyse and establish credible and expert evidence and ongoing discussions as to the most effective means to support the draft Local Plan through submission and examination stages in the following matters.

Education and School Places

The County Council has advised, through officer level discussions, that school place provision set out in the draft Local Plan is insufficient and does not meet current and future demand for mainstream and special education needs and disabilities (SEND) for the planned period 2023-2041 of the draft Local Plan. There is insufficient provision

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for securing necessary land or the mechanisms to transfer land to mitigate the impact of the shortfalls brought forward by the expected housing growth for this planned period. Neither the draft Local Plan or Infrastructure Delivery Plan currently provide the requisite detailed information to address this concern.

Transport and Travel

The CLLP represents a new approach to planning for transport, introducing a 'decide and provide' approach (more vision-led, similar to Vision and Validate) rather than a more conventional 'Predict and Provide' model (predicting future demand for travel based on recent trends and then providing appropriate transport supply to meet that demand). By adopting a vision led approach, the CLLP should be more resilient to future uncertainties around travel.

There remains ongoing evidence gathering and analysis which is yet to determine whether an appropriate (affordable and deliverable) scale and choice of new transport infrastructure and services can be secured to support the scale and distribution of growth and development under the draft Local Plan. There also remains concerns about the relevant policy provisions of the draft Local Plan as to whether transport and travel improvements will be secured through the application of the Local Plan in development decisions.

Strategic Growth and Economic Development

The county council continues to express concerns with regard to employment site allocations in the draft Local Plan, specifically:

- in meeting the need for employment land, it is strategically important to provide sites of the right scale in the right place including those which are suitable for supporting specialised sector growth and innovation.
- there are no new strategic employment sites allocated in the Plan. There is a need for strategic employment sites to be allocated in the Local Plan to meet growth needs and to support specialised needs.
- Samlesbury Enterprise Zone is a strategically important site with nationally-important occupiers but is likely to reach capacity early in the draft Local Plan's plan period and its specialised nature needs to be taken into account in the site allocation process.

The county council will continue to work collaboratively with the three central Lancashire local planning authorities to bring forward requisite evidence and propose mutually agreeable proposals to rectify these concerns and support the preparation of this Local Plan to adoption.

In support of this, the county council respectfully requests to participate in the examination and appear at the hearing sessions on the matters above and any other matters to which it may be able to offer assistance to the local authorities and to the Planning Inspector.

I hope this is helpful to you.



Yours faithfully



Marcus Hudson
Head of Planning and Transport