

## Response ID ANON-XXXX-WAUA-6

Submitted to Central Lancashire Local Plan Regulation 19 Representation Period  
Submitted on 2025-04-14 13:13:19

### Part A: Personal Details

1 What is your title?

Mr

2 What is your first name?

First Name:

Tom

3 What is your last name?

Last name:

Clarke MRTPI

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

Job title:

National Planning Adviser

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

Organisation:

Theatres Trust

6 What Authority do live/work in?

Not Answered

7 What is your address?

Address line 1:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 What is your email address?

Email:

planning@theatrestrust.org.uk

### Part B: Representation

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

Chapter 6: Healthy and Inclusive Communities (HC1-HC7)

Chapter 6: Healthy and Inclusive Communities

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

HC3: Community, Health and Education Facilities

HC3: Community, Health and Education Facilities

134 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:

Yes

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

Yes

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:

Yes

135 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 HC3: Legal Compliance:

Whilst we support and welcome the strength of this policy wording in relation to protecting valued facilities (HC3.2), we consider the marketing period of 6 months outlined within supporting paragraph 6.22 to be insufficient. This would not for example generally be enough time for a community group to fundraise to take on a facility. The minimum timeframe within the Local Plans of other authorities is generally at least 12 months, although we consider 18-24 months to be optimum. As a result we consider the policy currently would not adequately guard against unnecessary loss as set out in paragraph 98 of the NPPF (2024).

It would be beneficial for it to be made clear that marketing must be undertaken through recognised local and national channels appropriate to the use, and that the asking price must be reflective of existing use without development potential. Otherwise, it would be possible for applicants to manipulate lack of demand by setting a value which is unrealistically high.

We also note that paragraph 6.22 erroneously refers to criterion d, whereas it should be a. under part 2.

136 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.

HC3: Modifications:

Revision of paragraph 6.22:

Applications reliant upon criterion 2.a, should be supported by evidence demonstrating that the premises has been robustly marketed through appropriate local and national channels for at least 18 months, and no reasonable offers to retain the use as a community facility have been received.

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

No

## 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)?

No, I do not 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:

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