

# Central Lancashire Local Plan Regulation 22 Consultation Statement Main Report June 2025



**Chorley**  
Council



**Preston**  
City Council



**South  
Ribble**  
Borough Council



## Table of Contents

1.	Introduction .....	1
2.	Regulation 18 Consultations .....	2
2.1.	Issues and Options .....	2
2.2.	Preferred Options.....	5
3.	Regulation 19 Consultation .....	12
3.1.	Introduction .....	12
3.2.	What was included within the consultation?.....	12
3.3.	Who we consulted.....	14
3.4.	How we consulted.....	14
4.	Analysis of Regulation 19 Representations.....	19

Appendix 1: Issues and Options Outcomes Report

Appendix 2: Preferred Options Consultation Statement

## 1. Introduction

- 1.1 The Central Lancashire Local Plan sets out how development will be planned and delivered across the combined area from 2023 to 2041. The three Central Lancashire Authorities (CLAs) involved are Chorley Council, Preston City Council and South Ribble Borough Council. The single joint plan aims to ensure development is delivered sustainably and provides opportunities to meet local needs in our increasingly integrated and interdependent region. A range of matters are addressed including the climate emergency, nature emergency, local housing and employment need, the economy, the environment, community infrastructure and strategic infrastructure needs.
- 1.2 The Central Lancashire Local Plan (CLLP) will replace the Central Lancashire Core Strategy (2012), the Chorley Local Plan (2015), the Preston Local Plan (2015) and the South Ribble Local Plan (2015). It will include both strategic and non-strategic (development management) policies, bringing all these policies into one plan.
- 1.3 This document explains how the three CLAs undertook consultation on the Central Lancashire Local Plan Regulation 19 publication version and summarises prior (Regulation 18) consultation activity. It sets out how the Councils sought participation from communities and stakeholders across the three Boroughs. It covers:
  - Which bodies and persons were invited to make comments
  - How those bodies and persons were invited to make comment
  - The material that was subject to consultation
  - A summary of the main issues raised
  - How the representations were taken into consideration
- 1.4 This consultation statement complies with the three Councils' Statement of Community Involvement (SCI). Links to each Council's SCIs are below:
  - [Chorley Statement of Community Involvement \(2024\)](#)
  - [Preston Statement of Community Involvement \(2018\)](#)
  - [South Ribble Statement of Community Involvement \(2024\)](#)
- 1.5 The SCIs each outline that the Councils are committed to effective community engagement and seek to use a wide range of methods for involving the community in the plan making process.
- 1.6 The SCIs set out how the Councils will involve the community and stakeholders in the preparation, alteration and review of local planning policy and the consideration of planning applications. The SCI proposes that the consultation methods and those engaged would vary according to the purpose of the consultation and the bodies or persons who the Council were keen to involve.

## **2. Regulation 18 Consultations**

### **2.1. Issues and Options**

- 2.1.1 The Issues and Options consultation took place between 18th November 2019 and 14th February 2020. This was the first stage of consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.1.2 The Issues and Options consultation document presented information on a number of topics which could affect how development takes place across Central Lancashire over the plan period. Topics discussed in the paper included housing, employment, education, retail and leisure, environment, health, and transport and travel. The consultation also presented information on sites which had been suggested to the councils as locations for development. The Issues and Options consultation document did not set out proposed policy approaches or potential sites. This is the purpose of the Preferred Options consultation documents.
- 2.1.3 An Issues and Options Outcomes Report was published in September 2020. It sets out details of the issues and options consultation process and summarises the representations received. It is appended to this Statement (Appendix 1). Details of the consultation process and the key issues raised in the representations are summarised below.

#### **Who We Consulted**

- 2.1.4 A wide range of people were consulted on the Issues and Options Paper, including young people, businesses, community groups, interest groups, town and parish councils, landowners, housebuilders, infrastructure providers, retailers, statutory consultees, and anyone else who wanted to contribute.
- 2.1.5 Consultation with these groups was undertaken through a variety of methods including contact by email to over 1,400 people on the Central Lancashire Local Plan Mailing List database (letters were sent out as requested) alongside those persons separately registered on each authorities' individual consultation database, press releases, posts on social media and a series of face-to face consultation events held across the three boroughs in a variety of community locations.

#### **How We Consulted**

- 2.1.6 The consultation was available online through the Citizen Space portal, on which stakeholders could access and read the consultation documents and respond via an online questionnaire. The documents were also made available on each of the councils' websites and the Central Lancashire Local Plan website, each of which provided details of how to respond. The three councils also used social media to promote the consultation, with 'bite size' information provided about what a local plan is and how to get involved. Drop-in events were also promoted which ran alongside the online consultation. In addition, press releases were also sent out and a number of articles ran in local papers including the Lancashire Evening Post and Chorley Guardian. Online adverts also ran on Blog Preston.

- 2.1.7 In addition to the online resources, paper copies of the consultation materials were placed in all libraries across Central Lancashire, and at other agreed locations. These locations are identified in the Issues and Options Outcomes Report (Appendix 1 of this Statement).
- 2.1.8 A total of forty drop-in sessions took place across the 12-week period, with over 900 people attending these events. The drop-in sessions were held to enable people to speak to officers about the Local Plan and to answer any questions. The majority of events were well attended with a total of 912 people signing in. Those attending the events were also encouraged to sign up to our mailing list, and as a result of this consultation, an additional 1,235 stakeholders signed up (725 from Citizen Space and 510 from drop-in events or by email request). A full list of the of the locations and timings of the drop in events can be found in the Issues and Options Outcomes Report (Appendix 1 of this Statement).
- 2.1.9 Social media presence was used to help highlight the meetings taking place and assisted in achieving the high volume of people attending the events. We also had an article and advert featured on Blog Preston, the first received 814 hits and the latter 107 redirections to the Local Plan website.

### Summary of the Main Issues Raised

- 2.1.10 The Councils invited comments on 68 questions contained with the Issues and Options report. A total of 1,616 individuals and organisations responded to the consultation.
- 2.1.11 The Issues and Options Outcomes Report (Appendix 1 of this Statement) provides a detailed summary of the representations received. The table below summarises the key issues raised in the consultation responses against the topic/sections in the Issues and Options Paper.

Topic	Main Issues Raised
Vision and objectives	<ul style="list-style-type: none"> <li>• The vision should focus on the protection of natural assets and the prioritisation of climate change.</li> <li>• The vision should recognise the need to grow the area's economic ambition.</li> <li>• The vision should include a drive to deliver enough homes on viable sites whilst considering the impact increased development will have on already stretched infrastructure and services.</li> </ul>
Delivering homes	<ul style="list-style-type: none"> <li>• Further work is needed on the evidence base to enable a better understanding about specific housing needs across Central Lancashire.</li> <li>• Development should focus on brownfield sites first and regenerate empty homes.</li> <li>• New development must be in sustainable locations to discourage a reliance on cars and be energy efficient/carbon neutral.</li> <li>• New sites must properly assess the infrastructure needs.</li> <li>• The Local Plan needs to consider what the appropriate housing requirement is for the area and how City Deal fits in with this.</li> </ul>

Topic	Main Issues Raised
Economic growth, employment, education, and skills	<ul style="list-style-type: none"> <li>• Sustainable economic growth should be encouraged to meet local needs.</li> <li>• The amount and distribution of development should be informed by the Employment Land Study.</li> <li>• Brownfield land and accessible sites should be utilised.</li> <li>• Concern regarding the capacity of schools.</li> <li>• There should be closer partnership working with employers and higher education establishments to align skills and education with local job opportunities.</li> <li>• Town centres need investment and should include a more diverse range of uses.</li> <li>• Town centres should be more accessible by public transport.</li> <li>• Support for Preston as the principal centre, but it needs improvement.</li> </ul>
Transport and how we travel	<ul style="list-style-type: none"> <li>• Reduce the need to travel by ensuring new development is prioritised in sustainable locations.</li> <li>• There needs to be investment in active travel infrastructure.</li> <li>• A fully integrated, affordable, and reliable public transport system is required with increased frequency to make it a viable alternative to the car.</li> <li>• More parking and park and ride facilities are needed.</li> </ul>
Improving health and wellbeing	<ul style="list-style-type: none"> <li>• There needs to be more consideration of where fast food outlets are located.</li> <li>• Strong support for policies that encourage people to be healthier and provide opportunities to be more active.</li> <li>• More leisure and sports facilities are needed.</li> <li>• The importance of green spaces needs to be recognised and protected.</li> <li>• Support for the development of additional community facilities.</li> </ul>
Climate change and resource management	<ul style="list-style-type: none"> <li>• There needs to be joined up planning when identifying sites for housing and employment to reduce travel and dependence on cars.</li> <li>• There should be better public transport provision.</li> <li>• Safer and dedicated areas for cycling and walking should be provided.</li> <li>• New developments need to be greener, promote renewable energy and heating and include sustainable building practices.</li> </ul>
Locations for future development	<ul style="list-style-type: none"> <li>• When identifying sites, consideration needs to be given to achieving sustainable growth.</li> <li>• The evidence base needs to provide the information needed to enable decisions on where development is needed.</li> <li>• Concerns raised about specific development proposals regarding the impact on infrastructure, local amenity, loss of Green Belt land and highways impacts.</li> </ul>

## **How representations were taken into account**

- 2.1.12 The representations received were taken into account in the preparation of the Preferred Options Paper, in particular to help shape the vision and objectives, the policy directions and the proposed site allocations.

## **2.2. Preferred Options**

- 2.2.1 The Part One Preferred Options Consultation took place from Monday 19th December 2022 until Friday 24th February 2023. It was undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and each CLA's SCI. The purpose of the consultation was to invite views about the emerging Central Lancashire Local Plan, to ensure that local people, stakeholders, and other statutory bodies, can influence the Local Plan and ensure it is fit for purpose and meets our local needs and aspirations.
- 2.2.2 The consultation included details of the strategic framework for the new Local Plan, such as the vision, objectives, and spatial strategy, and setting out the ambition for the Central Lancashire economy, communities, and environment. The consultation also included emerging policies, referred to as policy directions, which considered key strategic and non-strategic policies which set out development needs for housing and employment. The consultation also included proposals for potential site allocations for housing and employment (and mixed use).

## **Who we consulted**

- 2.2.3 A wide range of people were consulted on the Preferred Options Paper including young people, businesses, community groups, interest groups, town and parish councils, landowners, housebuilders, transport providers, retailers, statutory consultees, and anyone else who wanted to contribute.
- 2.2.4 Consulting with these groups was undertaken through a variety of means including emailing 1,810 people on the Central Lancashire Local Plan Mailing list database alongside each authority's individual consultation database, press releases, posts on social media and a series of face-to face consultation events held across the three boroughs in a variety of community locations.

## **How we consulted**

- 2.2.5 A range of consultation methods were used to inform the public of the consultation and maintain interest and momentum in the process. This included a number of social media posts that were made on each of the three Councils' accounts (Facebook, Twitter etc) in addition to adverts on their own main websites.
- 2.2.6 In addition to the online resources, paper copies were placed in all libraries across Central Lancashire, and at other agreed locations, as identified in each Councils Statement of Community Involvement (SCI).
- 2.2.7 29 drop-in sessions were also held across the plan area throughout the consultation period. These were publicised on the Council's website and social media channels as well as by some parish councils through their social media. The events provided an

opportunity for people to come along and speak to planning officers and/or their local councillor about the proposals in the plan. A total of 814 consultees attended the events. A full list of the of the locations and timings of the drop in events can be found in the Preferred Options Consultation Statement (Appendix 2 of this Statement).

- 2.2.8 The digital platform, Citizen Space was the vehicle used to collect responses and is commonly used by a variety of public, third sector and private sector bodies including the DLUHC. The aim is to encourage as many representations as possible to be received digitally so that these can be easily collated, stored, and analysed. However, as we found with Issues and Options Consultation, a vast number of respondents elected to submit written responses either on email or PDFs or by hard copy.
- 2.2.9 As part of this consultation invitations for new development sites were opened (a call for sites 4) and there were 92 sites submitted for consideration as potential allocations for various uses, but predominantly housing. The majority of these were either resubmissions of sites we were already aware of and which have been assessed though the Strategic Housing Land Availability Assessment (SHELAA) or adjustments to an existing site. There were 42 completely new sites that had not been submitted in any previous consultations or through a 'call for sites' process.

**Summary of the main issues raised**

- 2.2.10 There were 928 respondents to the consultation, with an average of 160 comments per question.
- 2.2.11 The Preferred Options Consultation Statement (Appendix 2 of this Statement) provides a detailed summary of the representations received. The table below summarises the key issues raised in the consultation responses against the topic/policy directions in the Preferred Options Paper.

<b>Section/Policy Direction</b>	<b>Main Issues Raised</b>
Spatial vision and objectives	<ul style="list-style-type: none"> <li>• The environment should be considered as highly as economic growth in the vision.</li> <li>• The vision should have a strong focus on providing affordable and accessible housing, making sure communities are sufficiently supported by infrastructure and continuing to ensure the Green Belt and countryside are protected.</li> <li>• The objectives relating to climate change are too vague.</li> <li>• Some objectives need adjusting to be stronger.</li> </ul>
Policy Direction 1: Sustainable Growth Principles	<ul style="list-style-type: none"> <li>• Support the promotion of development in previously developed areas.</li> <li>• Access to amenities and infrastructure is a top priority.</li> <li>• Should be expanded to show how it will support sustainability and address climate change.</li> <li>• There is a need for improved infrastructure in existing communities to support new growth.</li> </ul>

Section/Policy Direction	Main Issues Raised
Policy Direction 2: Spatial Approach	<ul style="list-style-type: none"> <li>• Green Belt development should be considered only as a last resort.</li> <li>• Opposition to the growth option at Cuerdale Garden Village as growth should be concentrated in previously developed and urban areas.</li> <li>• New development could negatively affect the character of rural villages and countryside areas.</li> <li>• Focussing development away from existing built up areas may cause uneven development distribution where housing would be provided away from areas providing employment.</li> </ul>
Policy Direction 3: Green Belt	<ul style="list-style-type: none"> <li>• Support for the preservation of the Green Belt except in very special circumstances.</li> <li>• The policy should be stronger in refusing Green Belt development.</li> </ul>
Policy Direction 4: Development in the Countryside	<ul style="list-style-type: none"> <li>• Opposition to development in the countryside unless it is confined to brownfield land.</li> <li>• The character of rural villages and the countryside could be negatively impacted and no further development should be permitted in the countryside.</li> <li>• Support for the protection on Landscape Character Areas.</li> <li>• The policy could be strengthened to protect the countryside.</li> </ul>
Policy Direction 5: Longer Term Large Scale Development Options	<ul style="list-style-type: none"> <li>• Opposition to Cuerdale Garden Village.</li> <li>• The policy should be strengthened to ensure that the development of infrastructure is sufficient to support new growth.</li> <li>• Affordable housing and housing for older people is a gap in the policy.</li> </ul>
Policy Direction 6: Settlement Network and Hierarchy	<ul style="list-style-type: none"> <li>• The main urban areas should be considered under one tier.</li> <li>• Emphasis of the need to protect Green Belt land.</li> <li>• The policy should mention 'brownfield first'</li> </ul>
Policy Direction 7: Vibrant Centres	<ul style="list-style-type: none"> <li>• Centres should be developed to be less car centric, and there should be an increase in pedestrianisation.</li> <li>• Centres should focus on more than just retail.</li> <li>• Concern that the development of town centres will result in the loss of local character and identity.</li> <li>• There should be a specific policy prioritising support for local businesses.</li> </ul>
Policy Direction 8: Climate Change	<ul style="list-style-type: none"> <li>• The policy should be made stronger and more measures should be put in place to meet net zero and carbon neutral targets.</li> <li>• The policy requires over and above what is set out in national policy.</li> <li>• There is no mention of pollution control.</li> <li>• Suggestion of a carbon off-set fund.</li> </ul>

<b>Section/Policy Direction</b>	<b>Main Issues Raised</b>
Policy Direction 9: High Quality Places	<ul style="list-style-type: none"> <li>• Need to ensure that design is in line with local character, enforce stricter landscaping design guides and prioritise carbon neutral developments.</li> <li>• Developing and enhancing green spaces should also be included.</li> <li>• The policy should refer to the 10 principles of active design.</li> <li>• Health equality should be included in the policy.</li> <li>• The reuse of buildings should be encouraged.</li> </ul>
Policy Direction 10: 20 Minute Neighbourhoods	<ul style="list-style-type: none"> <li>• Concerns that the policy monitored and restricted the movements of residents (this was a misconception).</li> <li>• Development should be restricted to a brownfield first approach directing development away from green areas.</li> <li>• Suggestions that the policy should be retitled to combat public misconception and confusion generated by national press coverage regarding Oxford's 15 minute cities policy.</li> </ul>
Policy Direction 11: Scale of Housing Growth	<ul style="list-style-type: none"> <li>• Concern about the development of Green Belt land.</li> <li>• Support for a mixture of housing types and tenures</li> </ul>
Policy Direction 12: Indicative Distribution of Housing Requirements	<ul style="list-style-type: none"> <li>• Residents wished to see protection in the district they live in and higher levels of development in the districts that they do not live in i.e. Chorley residents wanted less development in Chorley and more development in Preston and South Ribble.</li> <li>• Brownfield development should be prioritised.</li> </ul>
Policy Direction 13: Gypsy, Traveller and Travelling Showperson Needs	<ul style="list-style-type: none"> <li>• Sites should be allocated in areas that will not put the Green Belt at risk.</li> <li>• Further consultation with the gypsy, traveller and travelling showpeople communities is needed in order to provide sites that will appropriately meet their needs.</li> </ul>
Policy Direction 14: Scale of Economic Growth	<ul style="list-style-type: none"> <li>• Opposition of development in Salmesbury and Cuerdale.</li> <li>• Concern about the capacity of existing infrastructure and sustainable travel options to employment land allocations.</li> <li>• Support the need for high-quality, sustainable design in new employment areas.</li> <li>• The employment land supply target is too high</li> </ul>
Policy Direction 15: Balanced Housing Market	<ul style="list-style-type: none"> <li>• Support for affordable housing provision.</li> <li>• There should be increased provision of affordable housing.</li> <li>• Meeting the needs of first time buyers should be a priority.</li> <li>• The policy needs to be more specific about how the housing needs of older people will be met.</li> <li>• The policy needs to be clear about preserving density patterns in protected areas.</li> <li>• All new houses should be built to M4(2) or M4(3) standard.</li> </ul>

<b>Section/Policy Direction</b>	<b>Main Issues Raised</b>
Policy Direction 16: Protection of Employment Premises, Employment Sites and Existing Employment Areas	<ul style="list-style-type: none"> <li>• Support for protecting existing employment areas.</li> <li>• The focus should be on retaining and further developing existing employment areas rather than developing new ones.</li> <li>• The policy should recognise the shift from office work to hybrid and work from home models.</li> </ul>
Policy Direction 17: Economic Growth Sector Strengths	<ul style="list-style-type: none"> <li>• Agricultural businesses and existing manufacturing need to be protected.</li> <li>• Need to develop spaces that will attract high skilled employment within sectors such as science, engineering, and technology.</li> <li>• Development should be focussed in existing employment areas.</li> </ul>
Policy Direction 18: Rural Economy	<ul style="list-style-type: none"> <li>• Need to recognise the importance of the contribution the rural economy makes to the wider economy in Central Lancashire.</li> <li>• Need to protect agricultural and Green Belt land to prevent the loss of natural habitats and heritage.</li> <li>• Small-scale development schemes should be supported as they can help boost the rural economy.</li> <li>• Policy wording should be changed to restrict development in the countryside.</li> </ul>
Policy Direction 19: Development in Town Centres	<ul style="list-style-type: none"> <li>• The focus on development and regeneration in Town Centres is positive.</li> <li>• Regeneration of Town Centres will not work.</li> <li>• Pedestrianisation may reduce the accessibility of shops and result in vacancies.</li> <li>• Exemptions should be applied to heritage assets and conservation areas.</li> </ul>
Policy Direction 20: Active Travel	<ul style="list-style-type: none"> <li>• Support for active travel.</li> <li>• Concern about the ability for active travel to be meaningfully integrated and supported in rural areas.</li> <li>• The existing cycling and walking infrastructure is not sufficient and the policy needs to address how this will be improved.</li> <li>• Secure bike storage units in town centres is an option for increasing cycling.</li> <li>• There should be more overarching policy wording that aims to create an overall active travel environment and network rather than solely implementing active travel into new developments.</li> </ul>

<b>Section/Policy Direction</b>	<b>Main Issues Raised</b>
Policy Direction 21: Food and Beverage Uses and Hot Food Take-aways	<ul style="list-style-type: none"> <li>• Concerns raised about the prevalence of hot food take-aways in Central Lancashire and how they contribute to poor diets and health outcomes.</li> <li>• Desire for a stricter policy to be put in place to prevent large fast-food chain restaurants from developing and prevent take-aways from being easily accessible.</li> <li>• Concern that the policy will hinder small business growth and effect the local economy.</li> <li>• The development of healthier food option should be promoted rather than restricting take-aways.</li> <li>• The policy should be stricter.</li> </ul>
Policy Direction 22: Skills and Economic Inclusion	<ul style="list-style-type: none"> <li>• The policy needs to meaningfully address inequality and deprivation.</li> <li>• There is a lack of educational infrastructure available to support this policy.</li> </ul>
Policy Direction 23: Community Facilities	<ul style="list-style-type: none"> <li>• Desire for more community facilities that are affordable for residents to rent.</li> <li>• Religious facilities should be included in the policy.</li> <li>• The policy should be amended to ensure community facilities are appropriately protected from loss.</li> </ul>
Policy Direction 24: Green and Blue Infrastructure	<ul style="list-style-type: none"> <li>• Green and blue infrastructure needs to be put in place before developments are occupied.</li> <li>• The policy should encompass more specific measures.</li> </ul>
Policy Direction 25: Biodiversity	<ul style="list-style-type: none"> <li>• Support for the important role of biodiversity.</li> <li>• The BNG requirements should be higher and it should be mandatory for it to be on-site.</li> <li>• Concerns that the policy will be a barrier to development and BNG requirements should not exceed the requirements in national policy.</li> </ul>
Policy Direction 26: Trees and Hedgerows	<ul style="list-style-type: none"> <li>• Stricter measures should be put in place.</li> <li>• Should be mandatory for replacement trees to be native and appropriate for the area.</li> <li>• Tree management schemes were suggested</li> </ul>
Policy Direction 27: Sustainable Water Management	<ul style="list-style-type: none"> <li>• Emphasis of the need for SuDS systems to be improved and expanded to respond to increased development and flooding events.</li> <li>• SuDS need to be subject to stricter monitoring to ensure they are fit for purpose.</li> <li>• The policy could be amended to strengthen the impact on flood mitigation.</li> <li>• The connection between flood mitigation and climate change should be made stronger.</li> </ul>
Policy Direction 28: Historic Environment	<ul style="list-style-type: none"> <li>• The definition of a heritage asset should be provided.</li> <li>• Support for the identified list of assets.</li> <li>• Gaps identified such as mention of Conservation Areas and areas of national archaeological importance.</li> </ul>

<b>Section/Policy Direction</b>	<b>Main Issues Raised</b>
Policy Direction 29: Renewable Energy Generation	<ul style="list-style-type: none"> <li>• Concerns about the cost and viability of the policy for homeowners, developers, and businesses.</li> <li>• Scepticism about the effectiveness of the policy in combating climate change.</li> <li>• Opposition to wind farms and fracking.</li> </ul>
Policy Direction 30: Reducing Energy Use at the Development Scale	<ul style="list-style-type: none"> <li>• Development should be focused on the regeneration of derelict and underused buildings and brownfield land to increase sustainability.</li> <li>• The policy will make developments less viable and it exceeds building regulations and is too onerous.</li> </ul>
Policy Direction 31: Energy Reduction in New Buildings	<ul style="list-style-type: none"> <li>• The measures are/should be incorporated into building regulations and are therefore not necessary in the Local Plan.</li> <li>• The policy wording should be stronger to increase the effectiveness of its implementation.</li> </ul>
Policy Direction 32: Infrastructure Planning Principles	<ul style="list-style-type: none"> <li>• Support in principle but scepticism over delivery and monitoring.</li> <li>• Further detail needs adding to explain what forms of infrastructure development would need to be provided or improved.</li> </ul>
Proposed site allocations	<ul style="list-style-type: none"> <li>• A large number of comments were received in relation to the preferred housing and employment allocations. Some were in support and some were objecting. These are summarised in Appendix 2.</li> </ul>

### **How representations were taken into account**

2.2.12 The representations received were taken into account in the preparation of the Regulation 19 Local Plan, in particular to help shape the policies and the proposed site allocations.

## **3. Regulation 19 Consultation**

### **3.1. Introduction**

- 3.1.1 The consultation was undertaken in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and each CLA's SCI. The purpose of the consultation was to invite representations on the Pre-Submission Draft (or 'Publication') Plan before it is submitted for examination by a Planning Inspector. At this stage representations could only be made on the legal compliance and 'soundness' of the CLLP. The tests of 'soundness' are, whether the plan has been Positively prepared, Justified, Effective and Consistent with national policy.
- 3.1.2 If the representor wished to seek modification to the plan (or part of) then they were required to make clear in what way the plan is inadequate having regard to legal compliance, the duty to cooperate and the four requirements of soundness, with supporting evidence and precisely outline how it should be modified.
- 3.1.3 Representors also had the opportunity to consider how they wish for their representation to be dealt with in the examination, i.e. whether they were content to rely exclusively on their written representation or whether they also wish to take part in the hearing session(s).

### **3.2. What was included within the consultation?**

- 3.2.1 The CLLP Publication Version covers a broad range of topics, each linked to the eleven strategic objectives of the plan, whilst also meeting the fundamental overarching objectives of economy, social and environmental as set out in the NPPF.
- 3.2.2 Strategic and non-strategic policies along with site allocations are included in the new plan. At the start of each topic chapter there is an overarching strategic policy, followed by site allocations (where appropriate) and non-strategic policies. Strategic policies are those necessary to address the strategic priorities of the area and to provide a clear starting point for the more detailed development management focused (non-strategic) policies that follow.
- 3.2.3 Key matters include the identified need for housing and employment, in addition to setting out the contributions expected from development, including levels of affordable housing and infrastructure e.g. education and transport.
- 3.2.4 The CLLP Publication Version also includes policies on a broad range of topics which will deliver direct benefits to our local communities, including play, open space and sports facilities, active and sustainable travel. Environmental benefits include biodiversity net gain and protection of our Green Belt and areas of open countryside.
- 3.2.5 An Integrated Assessment (IA) and a Habitats Regulation Assessment (HRA) have been completed. The IA incorporates the statutory requirements of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). Alongside this, a suite of evidence-based documents was published on the local plan website.

3.2.6 Below is the list of the main documents that were published at the draft Publication Regulation 19 stage.

**Table 1: Regulation 19 Documents**

Document 1	Central Lancashire Local Plan 2023-2041 Publication Version
Document 2	Central Lancashire Local Plan Policies Map (Publication Version) Map 1 – Overall
Document 3	Integrated Assessment of the Central Lancashire Local Plan: Pre-Submission Local Plan Final Report
Document 4	Integrated Assessment of the Central Lancashire Local Plan Pre-Submission Local Plan Non-Technical Summary
Document 5	Habitats Regulation Assessment of the Central Lancashire Local Plan: Pre-Submission Local Plan
Document 6	Statement of Representation Procedure and Statement of Fact (Regulation 19)
Document 7	Representation Form
Document 8	Representation Form – Accompanying Guidance
Document 9	Central Lancashire Strategic Housing and Economic Land Availability Assessment (SHELAA) Main Report
Document 10	Central Lancashire Strategic Housing and Economic Land Availability Assessment (SHELAA) Appendices 1-4
Document 11	Central Lancashire Strategic Housing and Economic Land Availability (SHELAA) Chorley Site Profiles – Appendix 5
Document 12	Central Lancashire Strategic Housing and Economic Land Availability Assessment (SHELAA) Preston Site Profiles – Appendix 6
Document 13	Central Lancashire Strategic Housing and Economic Land Availability Assessment (SHELAA) South Ribble Profiles – Appendix 7
Document 14	Housing and Employment Allocations: Site Selection Process

3.2.7 A full list of all documents published on the Central Lancashire Local Plan website can be found [here](#).

3.2.8 The Local Plan is supported by policies maps showing where housing, employment and other land uses are proposed. They also show policy designations and settlement boundaries. The tables below list the pdf maps that were available to view for each authority, as part of the consultation. Again, they can each be viewed through the Central Lancashire Local Plan website.

**Table 2 : Policy maps published for Chorley Council**

Map 2	Chorley Council
Map 2.1	Adlington Inset
Map 2.2	Bretherton Inset
Map 2.3	Brinscall and Withnell Inset
Map 2.4	Buckshaw Village Inset
Map 2.5	Charnock Richard Inset
Map 2.6	Chorley Town Inset
Map 2.7	Clayton Brook/Clayton Green Inset
Map 2.8	Clayton-le-Woods Inset

Map 2.9	Coppull Inset
Map 2.10	Croston Inset
Map 2.11	Eccleston Inset
Map 2.12	Euxton Inset
Map 2.13	Mawdesley Inset
Map 2.14	Wheelton Inset
Map 2.15	Whittle-le-Woods Inset

**Table 3 : Policy maps published for Preston City Council**

Map 3	Preston City Council
Map 3.1	Preston Urban Area
Map 3.2	Preston City Centre

**Table 4 : Policy maps published for South Ribble Borough Council**

Map 4	South Ribble Borough Council
Map 4.1	Leyland Urban Area
Map 4.2	Bamber Bridge Urban Area
Map 4.3	Longton and Hutton Area

### 3.3. Who we consulted

- 3.3.1 When consulting on a local plan it is important to have a robust consultation process that allows for contributions from all ages and interests across the plan area and is open and transparent. With that in mind, the aim was to hear from as wide a range of people as possible including young people, businesses, community groups, interest groups, town and parish councils, landowners, housebuilders, transport providers, retailers, statutory consultees, and anyone else who wanted to contribute.
- 3.3.2 Consulting with these groups was undertaken through a variety of means including emailing over 1,400 people on the Central Lancashire Local Plan Mailing List database (letters were sent out as requested) alongside those persons separately registered on each authorities' individual consultation database, press releases, posts on social media and a series of face-to face consultation events held across the three boroughs in a variety of community locations.

### 3.4. How we consulted

- 3.4.1 The Regulation 19 Consultation was undertaken from Monday 24<sup>th</sup> February 2025 until Monday 14<sup>th</sup> April 2025. During this period, a range of consultation methods were used to inform the public of the consultation and maintain interest and momentum in the process. The following methods were used to consult:

#### **Social Media**

- 3.4.2 A number of social media posts were made on each of the three Councils' accounts (Facebook, X etc) in addition to adverts on their own main websites. These posts advertised the consultation, the published documentation and means of responding. They also included advertisements for the drop-in events and associated reminders. 

## Deposit Points

- 3.4.3 Hard copies of documents were available at each Councils' main offices, which could be viewed during normal business hours. These were also available at all libraries across Central Lancashire, and post offices in settlements in Chorley where there is no library (in accordance with the Chorley SCI).
- 3.4.4 Locations for the libraries can be found at: [Find a library - Lancashire County Council](#)

**Table 5 : Deposit documents**

The Central Lancashire Local Plan 2023-2041 (Publication Version)
The Integrated Assessment of the Central Lancashire Local Plan: Pre-Submission Local Plan (this includes the Sustainability Appraisal and Equality Impact Assessment)
Pre-Submission Local Plan Integrated Assessment: Non-Technical Summary
Publication Policies Map (Publication Version)
The proposed Regulation 22 submission documents including evidence and topic papers

## Website

- 3.4.5 All documents were available to view online via the three authorities' planning webpages and the Central Lancashire Local Plan website. This included the Local Plan, the Integrated Assessment, Habitats Regulation Assessment, and the Policies maps for each Council, alongside supporting evidence documents.

[Central Lancashire Local Plan | Chorley](#)  
[Central Lancashire Local Plan - Preston City Council](#)  
[Central Lancashire Local Plan | South Ribble](#)  
[Home - Central Lancashire Local Plan](#)

- 3.4.6 The website also included a video providing general information about Regulation 19's prescribed questions regarding legal compliance and 'soundness' prepared by the RTPi's 'Planning Aid' team.

## Posters and Banners

- 3.4.7 Posters were provided to all deposit locations. Banners were also put up in the foyer area of each Councils' main reception area.

## Press Release and Formal Notices

- 3.4.8 There was a press release on each of the three Councils homepages and a formal notice was published in the Lancashire Evening Post.

## Attendance at Drop in Consultation Events

- 3.4.9 A series of public exhibitions and workshops were held across the plan area. These were publicised on the Council's website and social media channels, and through the

consultation mailouts. The events provided an opportunity for people to speak to planning officers about the draft plan and associated documents.

3.4.10 A total of 290 people attended the events across Chorley, Preston and South Ribble with details provided in the table below. There was a total of 82 attendees for the Chorley events, 58 for Preston and 150 for South Ribble.

**Table 6 : Chorley Drop-In Events**

Date of Event	Time of Event	Venue	Number of attendees
24/02/2025	4-7pm	Euxton Library	3
27/02/2025	4-7pm	Eccleston Library	5
5/03/2025	4-7pm	Tatton Community Centre	8
6/03/2025	4-7pm	Abbey Village Primary School	6
10/03/2025	4-7pm	Clayton Brook Community Centre	8
12/03/2025	4-7pm	Adlington & District Community Centre	31
1/04/2025	4-7pm	Coppull Library	14
3/04/2025	4-7pm	Town Hall	7

**Table 7 : Preston Drop-In Events**

Date of Event	Time of Event	Venue	Number of attendees
26/02/2025	11-2pm	Preston Markets	23
5/03/2025	3-6pm	University of Lancashire Cottam Campus	15
6/03/2025	3:30-6pm	Grimsargh Village Hall	3
13/03/2025	3-7pm	Preston Town Hall	11
20/03/2025	3-7pm	Fulwood Free Methodist Church	6

**Table 8 : South Ribble Drop-In Events**

Date of Event	Time of Event	Venue	Number of attendees
27/02/2025	4-7pm	Longton Library	44
04/03/2025	4-7pm	Kingsfold Library	14
12/03/2025	4-7pm	Lostock Hall Library	25
17/03/2025	4-7pm	Leyland Civic Centre	36
25/03/2025	4-7pm	St Aidans Church Bamber Bridge	31

### **Additional Events**

3.4.11 The team at Preston City Council held several other events for communities across the city, of which over 88 people attended. These events were invitation only and aimed to connect with ethnic minority communities and address specific needs. These events delivered a presentation and invited attendees to take part in a question-and-answer session. Two of the three events have been held at previous consultation stages, so this allowed the team to report back on specific questions and demonstrate amendments based on previous comments.

3.4.12 The event held at the Sahara Centre was presented as an example of best practice in consultation by the RTPi. Details of the event can be found [here](#).

Borough	Date of Event	Time of Event	Venue	Number of attendees
Preston	12/02/2025	12.30- 2pm	Sahara Centre	50+
Preston	24/02/2025	4-7pm	Preston Town Hall – Ethnic Minority Event	8
Preston	25/02/2025	4.30-7pm	Quwwat Education Centre	30+

### Means of responding to the consultation

3.4.13 As well as initial notifications, QR codes were provided on letters, posters and at consultation events, easily linking to digital copies of all documents and to the online survey.

3.4.14 The digital platform, Citizenspace was used to collect responses and is commonly used to undertake consultations by a variety of public, third sector and private sector bodies. The aim is to encourage as many representations as possible to be received digitally so that these can be easily collated, stored, and analysed. However, as we found with previous consultations, a vast number of respondents elected to submit written responses either on email or PDFs or by hard copy.

3.4.15 Alternatively, representations could be received by completing a copy of the Representation Form and sending it to the team via email or post.

### Level of Response

3.4.16 There were 636 representations received. Of these 515 were submitted on the representation form by e-mail, 6 by post and 115 online via Citizen Space.

### Representations received from Prescribed Bodies, Neighbouring Authorities, and other Relevant Bodies

3.4.17 The following bodies submitted a representation to the draft plan:

- Fylde Council
- Historic England
- Blackburn with Darwen Council
- Homes England
- National Grid Electricity Transmission
- West Lancashire Borough Council
- Grimsargh Parish Council
- Farington Parish Council
- Lancashire County Combined Authority
- University of Lancashire
- Defence Infrastructure Organisation
- Lancashire County Council
- Lancashire & South Cumbria Integrated Care Board
- NHS Property Services

- United Utilities
- National Highways (by WSP)
- Heath Charnock Parish Council
- The Wildlife Trust for Lancashire, Manchester & North Merseyside
- Environment Agency
- Whittingham Parish Council
- Bretherton Parish Council
- The Coal Authority
- Whittle-le-Woods Parish Council
- Theatres Trust
- Sport England
- Natural England

### **Omission Sites**

3.4.18 There were 50 sites submitted to the consultation for consideration as potential allocations for various uses, but predominantly housing. The majority of these were either resubmissions of sites the CLAs were already aware of, and which have been assessed through the Strategic Housing and Employment Land Availability Assessment (SHELAA) or adjustments to an existing site. There were also some new sites that had not been submitted in any previous 'call for sites' exercises.

## 4. Analysis of Regulation 19 Representations

4.1 The following tables provide a summary of the main issues raised against each policy or section of the plan. For some policies there were no representations made and therefore there are no comments.

### General Plan and Area Profile

General Plan	Number of responses: 12
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Local Plan proposed period is 2023-2041, this period should be extended to 2042 to be considered sound.</li> <li>• CLLP does not satisfy regulations nor NPPF/PPG – plan relies on advice and guidance of development plans set out in NPPF 2023, but policies relate to NPPF 2024.</li> <li>• Regulation 18 was supposed to be carried out in two stages. Part two has been ‘skipped.’ Approach has ‘managed out’. Inappropriate consideration of employment land requirements and the representor wishes to present their case for an additional site to deliver a major logistics facility to serve Chorley.</li> <li>• The plan may not be legally compliant to procedural requirements and is unsound.</li> <li>• Insufficient evidence provided to show that the proposed allocations are the most sustainable or appropriate option compared to other reasonable alternatives.</li> <li>• Inadequate evidence of cross-boundary cooperation or joint working with neighbouring authorities, especially regarding infrastructure provision and cumulative environmental impact, raises questions about the deliverability of the proposed allocations.</li> <li>• No concerns with approach taken to calculate housing need and requirement.</li> <li>• Almost 9,000 home shortfall in housing supply to deliver HS1, trajectories set out in appendices show shortfall is made up by existing commitments, and windfall allowances, but no explanation or justification provided for these in the plan.</li> <li>• Concerns regarding the deficiencies and adequacy &amp; evidence base for transport and social infrastructure (schools) and clarity of gypsy and traveller policy (HS13).</li> <li>• Gaps in duty to cooperate, insufficient engagement and lack of clarity.</li> <li>• The inclusion of crime prevention and security as important factors to consider in development is welcomed.</li> <li>• Support the Plan’s vision and objectives, with emphasis on higher education and enhancing Preston City Centre.</li> <li>• Work remains ongoing to support the plan in relation to school place planning, transport and travel and strategic growth and economic development (see other responses). 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.</li> <li>• Site-specific issues and constraints identified within South Ribble. These should be addressed within the Key Development Considerations (KDCs) for each site, and request that all site allocations are served by accompanying KDCs.</li> </ul>	

Area Profile	Number of responses: 5
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Does not agree that the Local Plan suggests economic growth should be distributed fairly across and that allocations should be sensibly and strategically distributed across Central Lancashire area.</li> <li>• Concerned if employment sites at Preston West and Cuerden do not come forward for development or within the plan period, there would be 55 ha less of the plans' employment requirement. Cuerden identified as employment development, a new hospital would diminish the amount of employment land available.</li> <li>• Support for any initiatives across the Central Lancashire Authorities that are designed to assist and deliver social value and will continue to do so through its developments.</li> <li>• Welcomes the intention that the vision for the area is 'founded on a good understanding of the characteristics of Central Lancashire and the key challenges, needs and opportunities facing the area.'</li> <li>• The section on Economic, Social and Environmental Challenges and Opportunities fails to mention the historic environment. It mentions the natural environment amongst others for example.</li> <li>• The challenge of delivering enough housing, employment, and a variety of other needs, should be supported by the role heritage and culture plays in Central Lancashire's attractiveness for business, tourism and as a place to live.</li> <li>• Any overarching section for area, such as this, should include reference to the historic environment. The historic environment will feature in this area in different ways. This would then ensure that not only does it feature in any proposals for this area but also matches other areas of the Local Plan.</li> <li>• Would welcome the inclusion of reference to the historic environment. This would ensure that there is a positive strategy for the historic environment in line with the requirements of the NPPF.</li> </ul>	

### Chapter 3: Vision, Objectives and Spatial Strategy

Spatial Vision	Number of responses: 8
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Support the Local Plan's vision in principle, but it should recognise Local Housing Need (LHN) and economic growth aspirations.</li> <li>• Text proposed to increase the emphasis on economic development:</li> <li>• The Plan lacks a strong, consistent link to the corresponding need for housing growth.</li> <li>• The proposed allocations fall short of meeting the full housing requirement.</li> <li>• The vision is not supported by the quantum of land use allocations.</li> <li>• Concerns that the aspirational tone set out within the stated vision and associated objectives is not matched by the policies.</li> <li>• Text modifications are proposed to increase focus on heritage. The Spatial Vision, Strategic Objectives and the Spatial Strategy described in Policy SS1 are not ambitious enough.</li> <li>• The Plan does not recognise the economic growth potential of the cyber corridor between Lancaster and Manchester (including the M6-A59 corridor and the Growth Axis linking Samlesbury, Blackburn town centre and the M65) cited within the Blackburn with Darwen Local Plan and draft Lancashire Growth Plan.</li> <li>• The Local Plan's ambitions adhere and align to the DfT Circular 01/2022.</li> </ul>	

<ul style="list-style-type: none"> <li>• Cross-boundary impact with neighbouring authorities regarding site allocations should be considered.</li> </ul>	
Strategic Objectives	Number of responses: 7
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Supports Strategic Objective 4 - Economic Prosperity in principle but proposes text modification. .</li> <li>• Objective 3 should state that the Councils seek to surpass Housing Needs, rather than just “meet” them.</li> <li>• Objective 9 should not state that the Councils will seek to conserve and enhance un-designated landscapes.</li> <li>• Objective 3 should be reworded to focus the plan on delivering a sufficient supply of homes and to support the Government's objective of significantly boosting housing supply.</li> <li>• Objective 4 should be revised to emphasise the intrinsic link between economic success and adequate housing provision.</li> <li>• Support the aspirational tone set out within the stated vision and associated objectives, these aspirations are not matched by the policies.</li> <li>• Support for objectives.</li> <li>• The Plan’s objectives align the Circular 01/2022.</li> </ul>	
SS1: Development Patterns	Number of responses: 17
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Seeks to ensure protection of public rights of way (PROW) and ensure they are a material consideration when determining planning applications.</li> <li>• Whilst it is appropriate to support and maximise the use of previously developed sites and sites this should not prevent the delivery of other sustainable sites or sustainable developments.</li> <li>• By failing to plan for the new minimum housing requirement, it is considered Central Lancashire is not supporting delivery of SS1. The plan particularly underdelivers for Chorley.</li> <li>• Wording to parts 3 and 4 of the policy are restrictive and do not allow for development around settlements which is considered to restrict their growth.</li> <li>• Greater flexibility is required to improve deliverability of housing in the CLLP and to ensure a robust supply of deliverable housing land can be maintained.</li> <li>• Include reference to development within the grey belt and such development being expected to demonstrate very special circumstances.</li> <li>• Support for the policy.</li> <li>• Issue raised over the potential Salmesbury/Cuerdale Growth Option adjacent to the A59, and its significant harm to the Green Belt and the Brockholes Nature Reserve SSSI.</li> <li>• Insufficient justification has been provided as to how the development patterns proposed by Policy SS1 have been derived.</li> <li>• Issue of GB has not been addressed in a transparent manner and insufficient justification has been provided to demonstrate that exceptional circumstances no longer exist to justify the lack of Green Belt release.</li> <li>• SS1 fails to allocate sufficient land to meet housing needs in full with no substantial new allocations.</li> </ul>	

<ul style="list-style-type: none"> <li>• The Spatial Strategy is unbalanced, directing most growth to North West Preston. It is noted there is safeguarded land in Chorley and South Ribble which could accommodate housing.</li> <li>• The CLLP makes significant allowances for windfalls in the claimed supply 3,139 windfall allowance (13.3% of supply).</li> <li>• SS1 is unsound as it is not consistent with para 124 of NPPF. In accordance with SS1, two parcels of land in Chorley should be considered for housing as they are within the settlement boundary.</li> </ul>	
SS2: Settlement Hierarchy	Number of responses: 21
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• General support for the tiers.</li> <li>• SS2 considered unsound and should provide an appropriate settlement hierarchy which provides a logical hierarchy and allows for a suitable and sustainable spatial distribution of sites, provides an appropriate development pattern, and supports sustainable development within all market areas.</li> <li>• A more balanced approach towards housing growth is required to ensure that Chorley is able to meet its Local Housing Need as a minimum.</li> <li>• Object to the placement of Broughton and Goosnargh in the Settlement Hierarchy.</li> <li>• Request for Cuerdale to be added to tier 2.</li> <li>• Further growth should be allocated to the tier 2, 3 &amp; 4 settlements to ensure the housing need figure is delivered and to allow for greater flexibility.</li> <li>• Tier 5 Smaller Rural Villages and Hamlets have a number of moderately sized allocations despite Policy Direction 6 indicating that only low levels of growth and investment would be directed to such settlements.</li> <li>• Not provided any robust evidence to demonstrate how the spatial strategy or settlement hierarchy has guided the allocation of sites.</li> <li>• Wording change requested from Goosnargh to Whittingham at tier 5.</li> <li>• SS2 places an over reliance on urban areas like NW Preston whilst failing to consider sustainable Green Belt releases. There are no strategic sites being proposed in the borough of Chorley despite market and affordable housing need.</li> <li>• This section needs to clearly demonstrates the relationship between policies EN7, HC5, EN5, EN10, EN11 and EN12.</li> </ul>	
SS3: Strategic Site Allocation – North West Preston/Bartle	Number of responses: 10
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• It is essential that delivery of SS3 or indeed any application(s) does not prejudice the ability of the adjacent site to come forward in line with the permitted scheme</li> <li>• Challenge to delivery forecasts: Preston contends that development will start to come forward at the Site in 2029. In the representors experience, three outlets operating concurrently can achieve an approximate delivery rate of 100 dpa. Therefore, from years 6-15 of the plan period, 1,000 of the 2,767 allocated dwellings are anticipated to come forward.</li> <li>• Support for SS3 and its requirement to deliver a range of centres in line with the NW Preston Masterplan.</li> <li>• Allocation SS3 appears to include playing field land. Any forthcoming development proposals that would result in their loss or prejudice their use should be consistent with NPPF paragraph 103, 104 and 200 and also Sport England’s Playing Fields Policy.</li> </ul>	

SS4: Strategic Site Allocation – Fulwood Barracks	Number of responses: 8
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• The site is only expected to be decommissioned within the next five years. It is not reasonable to expect any residential development to come forward in six years, therefore it should be pushed back to 10+ years.</li> <li>• Support the production of the Heritage Impact Assessment for the site (HIA). It is important the content in the HIA, and its requirements are tied into the plan. Two text modifications are suggested.</li> <li>• The site capacity should be 440 dwellings, and the net developable area should be 11.77 hectares. This would make better use of a brownfield site and assist in ensuring the heritage assets on site can be converted into a viable use.</li> <li>• The latest timescales for disposal show that the Site will cease to be operational from 2031.</li> <li>• The Ancient Battlefield land is not included within the allocation boundary nor the MoD's ownership. Battlefield Site is not identified as being existing open space (HC6).</li> <li>• Evidence does not support the retention of the existing 3G pitch. Reference to 3G pitches as a plural is inaccurate. Tennis and basketball court would not meet the definition of a 3G playing pitch.</li> <li>• The nearest primary care practices that may be affected by this development are Dr Wilson and Partners (The Healthcare Centre), Moor Park Surgery, Gutteridge Medical Centre (2 x GP practices in situ).</li> <li>• There is a significant wastewater network structure within the site boundary. An appropriate stand-off distance will be required.</li> <li>• There may be adverse impacts to the SRN at M6 Junction 31 (approximately 2.7 miles via the A5085 and A59), M6 Junction 31a (approximately 1.7 miles via the B6242) and M55 Junction 1 (approximately 2.8 miles north via the A6). Interventions will be required to demonstrate that no adverse impacts will be experienced at these junctions in terms of capacity, queueing, or safety.</li> </ul>	
SS5: Strategic Site Allocation – Preston West	Number of responses: 14
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Support for SS5 and how it fits with the overriding spatial strategy of the CLLP and para 125 (c) of the NPPF.</li> <li>• Concerns raised about multiple landowners, operational golf course in Phase B, no consideration of BNG, affordable housing affecting viability, constraints listed in IA and the need for a masterplan highlighting the site cannot be delivered in the short term.</li> <li>• The evidence base does not provide clear commercial rationale for proposing a 50/50 split, in terms of the site's attractiveness for particular employment uses and whether there are any market-based demand factors driving this.</li> <li>• Amount of land allocated for employment should be reduced to no more than 30ha.</li> <li>• There is insufficient information to confirm that all landowners are committed to development of the site for residential purposes.</li> <li>• The site is within functional flood plain and contains a number of listed heritage assets.</li> <li>• Suggest a number of development considerations need to be thought-out further, with specific concern around wording relating to the delivery of Cottam parkway.</li> <li>• Nearly 2,000 homes will have a negative impact on Preston and surrounding areas.</li> <li>• Questions the research and data to suggest a train station is required.</li> <li>• Would welcome reference to the Council's HIA and make it a requirement,</li> </ul>	

<p>as well as text changes, which would be in line with the requirements of the NPPF in respect of heritage.</p> <ul style="list-style-type: none"> <li>• A National Grid Asset interacts with this allocation.</li> <li>• The nearest primary care practices to this development are Ingol Health Centre, The Park Medical Practice and Briarwood Medical Practice; all are impacted by the Northwest Preston / Bartle (Policy SS3) development. All are also beyond the ideal travelling distance for patients requiring access to primary care services of 1.1 miles, access via car is 7 minutes or via bus 30 minutes.</li> <li>• SS5 may result in an adverse impact on the SRN at M55 Junction 2.</li> <li>• This allocation appears to include Ashton &amp; Lea Golf Club. Any forthcoming development proposals that would result in their loss or prejudice their use should be consistent with NPPF and Sport England’s Playing Fields Policy.</li> </ul>	
SS6: Strategic Site Allocation – Pickering’s Farm, Penwortham	Number of responses: 4
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Support the proposed allocation. No modifications to the Key Development Considerations are proposed.</li> <li>• The proposed Key Development Considerations (KDCs) should respond to the existing overhead cable route running through the site.</li> <li>• Any amendments to the approved masterplan should be agreed with National Highways.</li> <li>• Support the continued allocation of the site, however, modifications to SS6A’s KDCs are necessary.</li> </ul>	

**Chapter 4: Balanced Housing Market**

HS1: Scale of Housing Growth and Distribution of Housing Requirements	Number of responses: 33
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• The plan period will not cover 15 years from adoption, it should extend to 2042</li> <li>• The transitional arrangements have not been met as the housing requirement equates to 79% of the new standard method.</li> <li>• Simply adding 77 dpa to the housing requirement is arbitrary and not evidence based.</li> <li>• The employment led scenario used to determine the housing requirements should include the jobs forecasted for the National Cyber Force Innovation Hub and is based on overly cautious employment forecasts.</li> <li>• The housing and employment policies are fundamentally misaligned.</li> <li>• The evidence base shows that there is available supply to meet a more ambitious housing requirement without releasing Green Belt.</li> <li>• There is an insufficient supply buffer, there should be a 15% or 20% buffer.</li> <li>• The CLLP does not reflect the distribution recommended in the Housing Study, each authority should meet its own needs and there should be Green Belt release in Chorley to meet its need.</li> <li>• It is inappropriate to have a stepped requirements in Chorley as it unnecessarily delays meeting the identified development needs.</li> <li>• There has been no adjustment to the housing requirements for meeting older persons and specialist needs housing.</li> <li>• There is no provision for an early review of the plan should existing allocations fail to deliver.</li> </ul>	

HS2: Housing Allocations Chorley	Number of responses: 50
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• At least 10% of the housing requirement is not on sites no larger than one hectare.</li> <li>• More sites should be allocated so that there is a sufficient buffer.</li> <li>• Concerns that the allocations have not been properly assessed by sufficient evidence.</li> <li>• It is claimed that the proposed deliverable housing supply is overestimated as there is an unrealistic reliance on a large windfall allowance.</li> <li>• Concerns regarding flood risk on allocation HS2.5.</li> <li>• Concerns regarding surface water flood risk on allocation HS2.6 and the assessment of the site in the SHELAA.</li> <li>• Concern about the impact of allocation HS2.7 on infrastructure in Brinscall.</li> <li>• Support for allocation HS2.10 but object to the allocation being reduced in size as it is disputed there would be a significant impact on landscape character.</li> <li>• Objection to allocation HS2.10 as a planning application on adjacent land was dismissed at appeal as the Inspector concluded it would result in considerable harm to the character and appearance of the area.</li> <li>• Objection to allocation HS2.11 as the Heritage Impact Assessment identifies the development would have a significant impact on the setting of a Grade II Listed Building.</li> <li>• Concerns regarding getting a suitable highways access to allocations HS2.34, HS2.35 and HS2.36 and the wider impact on surrounding roads in Whittle-le-Woods.</li> <li>• Concerns about contamination on allocations HS2.35 and HS2.36.</li> <li>• Support for allocations HS2.5, HS2.6, HS2.13, HS2.16, HS2.25, HS2.26, HS2.34 and HS2.37.</li> </ul>	
HS3: Housing Allocations South Ribble	Number of responses: 60
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Plan should allocate more sites than required to meet the housing requirement buffer and achieve consistency with NPPF</li> <li>• Plan should provide a surplus of land and is presently inflexible</li> <li>• Proposed allocations only cover 80% of the identified housing requirement</li> <li>• Insufficient evidence to demonstrate sites are deliverable</li> <li>• Plan should identify the 10% small sites requirements through allocations to support the viability of sites by providing assurances as to their development potential</li> <li>• Insufficient housing allocations, and unrealistic reliance on large windfall sites coming forward. Anticipated delivery is over optimistic and likely to go beyond plan period. Allocations are not informed by strategy. Do not agree with Council assessments of housing delivery and five-year supply should be reduced.</li> <li>• Queries about why South Ribble is 'carrying' Chorley's housing requirement.</li> <li>• HS3.1 is supported, but boundary modification proposed to reflect land ownership</li> <li>• HS3.2 is sound, justified by evidence and deliverable. Site can take an increased capacity of 448 dwellings (not 435).</li> <li>• HS3.3 is sound and legally compliant, but concerns over BNG provision</li> <li>• HS3.4, HS3.6, HS3.8 &amp; HS3.9 allocations are supported and are deliverable</li> <li>• HS3.5 allocation is supported, but boundary modification proposed to reflect land ownership</li> <li>• HS3.10 boundary needs to reflect correct ownerships</li> <li>• HS3.19 supported, but amendments needed to boundaries of site</li> </ul>	

- Concerns as to whether allocations have been properly assessed by sufficient evidence
- Concerns that some policy requirements are not consistent with the evidence base
- Objections to HS3.1, HS3.2, HS3.3, HS3.5, HS3.6, HS3.10, HS3.13 on the grounds of loss of Green Belt; overdevelopment; flooding, sewerage and surface water run off (particularly for HS3.3); loss of biodiversity; wildlife corridors; impacts on designated wildlife sites (e.g. Ramsar) proximity to WWTW (HS3.1); highway safety; traffic and congestion; loss of countryside; insufficient infrastructure; lack of services and facilities; loss of village character; climate change; noise; dirt; privacy; house-prices / area devaluation; insufficient community engagement; inconsistent with NPPF. HS3.10 reported to have restrictive covenants in place.
- Specific concerns raised in relation to HS3.3 and impacts of further development on waste-water infrastructure in Longton / Hutton. Policy should have increased emphasis and requirements on need to address these issues and design and deliver site's infrastructure in a holistic way.
- Welcome production of HIAs, but these should be included within KDCs for relevant sites
- KDCs should reflect site specific needs, including overhead cable routes and clarification regarding WWTW and presence of deep peat.
- Mixed use site (Cuerden) has not been included within policy HS3 allocations; site should be noted in the policy or supporting text

HS4: Housing Allocations Preston	Number of responses: 11
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- Main issues raised:
- Allocated sites in Preston should be reduced by 2,359 units and that allocations HS4.6, HS4.8, HS4.9, HS4.11, HS4.13-16, HS4.18-4.24 and HS4.26-29 should be removed.
  - Concerns as to whether the allocations set out in HS2, HS3, and HS4 have been properly assessed by sufficient evidence in terms of deliverability.
  - Need for a balanced approach to development that ensures a variety of housing types, tenures, locations, and markets, allowing the plan to effectively meet housing needs.
  - Policy mapping error for site HS4.4 highlighted
  - Support for HS4.13 & HS4.14 for older peoples' housing. Request for site HS4.13 & HS4.14 to not be required to provide affordable housing.
  - Objection to sites HS4.13 & HS4.14 being removed from the area of separation and allocated for older peoples housing. There is no evidence to suggest homes for the elderly are required in this location.

HS5: Open Space and Playing Pitch Requirements in New Housing Developments	Number of responses: 8
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- Main issues raised:
- It is not clear or justified why the requirements are in excess of national benchmarks.
  - The calculation of open space by typology is unjustified and flawed due to it being based on current provision rather than the need generated by new development.
  - The cost per dwelling for financial off-site contributions has not been evidenced in the viability assessment.
  - There is no explicit viability clause.
  - The policy is unsound because it fails to acknowledge that the delivery of new strategic areas of public open space requires the support of new housing development.

<ul style="list-style-type: none"> <li>• Land for allotments have not been allocated on the policies map.</li> <li>• Concerns that the playing pitch element of the policy is not based on up-to-date evidence.</li> </ul>	
HS6: Housing Mix and Density	Number of responses: 18
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• There needs to be flexibility applied to the housing mix and accessibility standard requirements.</li> <li>• The criteria in PPG should be applied to evidence the adoption of the optional standards.</li> <li>• There is a significant additional cost of providing M4(2) and M4(3) dwellings which will impact on viability.</li> <li>• The case for M4(2) and M4(3) dwellings has been overstated within the evidence base.</li> <li>• The density requirements do not provide flexibility to account for the reduction in gross to net developable areas as a result of a series of legal and national policy changes i.e. BNG.</li> <li>• The housing mix ranges should be wider to allow for site specific considerations to be taken into account.</li> <li>• The blanket requirement for all dwellings to be built to M4(2) standard is not justified.</li> <li>• It is not always possible or practicable to meet M4(2) standards i.e. it is impracticable to require lifts to be installed in 2-3 storey apartment blocks. This will also impact on viability.</li> </ul>	
HS7: Affordable Housing	Number of responses: 18
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Housing figure for Chorley will fail to deliver the required level of affordable housing</li> <li>• Policy does not adequately address viability constraints relating to affordable housing on specialist needs proposals, including older persons housing (OPH)</li> <li>• Housing requirement should be increased to meet these needs.</li> <li>• Policy on providing flexibility to an alternative tenure split is welcomed, but would benefit from a required range rather than specific percentages</li> <li>• Unclear why affordable housing tenure split for Chorley differs to that of Preston and South Ribble; and what evidence informed it</li> <li>• Affordable targets of 30-35% seem high and unclear about evidence underpinning them</li> <li>• 20% supplement on value of a commuted sum for affordable housing is not justified within the CLLP or supported by evidence</li> <li>• Inconsistencies within methodologies used by each district and concern they have been calculated incorrectly</li> <li>• HS6 policy will impact on HS7 and delivery of affordable housing</li> <li>• Concerns raised with the percentages stated through the policy</li> <li>• Prescribed tenure mix (100%) will prevent some sites being deliverable</li> <li>• Policy is vague and inflexible; more flexibility is needed</li> <li>• Policy does not support viability, particularly on sites in Tier 4 of the settlement hierarchy</li> </ul>	

HS8: Rural Exception Sites	Number of responses: 4
Main issues raised: <ul style="list-style-type: none"> <li>• Policy should not preclude affordable housing exception site in Tier 3 settlements</li> <li>• Concerns that the policy criteria is overly restrictive and should allow greater flexibility in site selection and viability mechanism.</li> <li>• Historic England supports this policy.</li> <li>• Concerns that multiple applications could be submitted around the settlement boundary.</li> </ul>	
HS9: Rural Workers' Dwellings	Number of responses: 0
Main issues raised:  N/A	
HS10: Houses in Multiple Occupation (HMOs)	Number of responses: 1
Main issue raised: <ul style="list-style-type: none"> <li>• National Highways may be able to provide comments if the HMO is in the area of SRN in respect to Criteria D.</li> </ul>	
HS11: Self-Build and Custom Build Housing (SBCH)	Number of responses: 3
Main issues raised: <ul style="list-style-type: none"> <li>• Policy introduces a new definition of SBCH which is inconsistent with legislation</li> <li>• Policy should include specific reference to the historic environment</li> <li>• Support for the policy</li> </ul>	
HS12: Specialist Housing	Number of responses: 6
Main issues raised: <ul style="list-style-type: none"> <li>• A policy exclusively focused on older person's housing (OPH) should be included.</li> <li>• Plans evidence base finds a need for OPH but this has not been planned for adequately; the Councils are reliant on dwellings built to M4(2) and M4(3) standards, but there is no guarantee these will be occupied by older persons.</li> <li>• Support principle of the policy but note that the plan is overly reliant on windfall development to meet the housing needs of older people.</li> </ul>	
HS13: Gypsy, Traveller and Travelling Showperson Needs	Number of responses: 6
Main issues raised: <ul style="list-style-type: none"> <li>• The policy is inadequate and unsound as it does not set pitch targets in accordance with the PPTS.</li> <li>• The policy should also resist the loss of authorised sites as well as allocations.</li> <li>• Criterion 5 should not require sites to be accessible by public transport as gypsies and travellers tend to be dependent on private cars and commercial vehicles.</li> <li>• The GTAA does not provide a robust evidence base.</li> </ul>	

- Paragraph 4.03 is misleading, the needs of the residents at Hut Lane cannot be met on the existing site. The adjacent land owned by the Council should also be allocated.
- The GTAA does not identify the need for travelling showpeople plots, it overlooks their needs.
- Allocations in the Green Belt should be removed from the Green Belt.

## Chapter 5: Prosperous Economy

EC1: Scale of Economic Growth	Number of responses: 10
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Employment OAN reduced significantly particularly in Chorley between 2022-24 Employment Land Studies. Reason for reduction not justified.</li> <li>• Limited employment land supply in Chorley</li> <li>• SHELAA site assessments flawed which has limited employment sites in Chorley</li> <li>• CLLP should allocate more employment land than identified need</li> <li>• Distribution of employment sites does not correspond with OANs and there is insufficient supply in Chorley.</li> <li>• The CLLP is over reliant on Cuerden for the delivery of office space.</li> <li>• Concern regarding the deliverability of sites including Preston West and Cuerden</li> <li>• Types of employment with locational demands such as logistics are not met.</li> <li>• Unmet need from the Core Strategy employment land take-up targets should be reflected in the CLLP Plan period.</li> <li>• Employment land should be provided to meet the needs of the UK defence sector</li> <li>• The need for strategic units should be considered at a Property Market Area level.</li> <li>• The ELS Update 2025 should be revised; the employment land requirement should be substantially increased.</li> <li>• The amount of available land at Cuerden is overestimated, 16ha has been sold to the NHS for a new hospital, 4ha is required for strategic landscaping and access, 6ha is approved for non –employment uses such as leisure and retail. Cuerden employment land area should be reviewed.</li> <li>• The 9ha at Lancashire Business Park is unavailable to occupiers other than Leyland Trucks.</li> <li>• Increase in employment allocations in South Ribble is required.</li> <li>• Implications of the National Cyber Force need to be fully considered.</li> <li>• Cuerdale Strategic site should be allocated as a regionally significant site for employment.</li> <li>• Local Plan lacks economic growth ambition, which is contrary to Lancashire strategies, including the Lancashire Growth Plan (draft)</li> <li>• Policy EC1 does not provide further breakdown of need by employment land type within the use classes and unclear whether all employment needs will be met in full</li> <li>• Total site area for Chorley is incorrect and should say 12.66 in Policy EC5</li> <li>• Combined OAN for employment land across Central Lancashire will not be met by the employment and mixed-use land allocations in Policies EC2-EC7, creating an employment land shortfall that should be met by additional employment land allocations; this is further exacerbated in South Ribble.</li> <li>• EC1 is not ambitious enough and does not sufficiently stimulate and enable economic and housing growth; evidence base is flawed and does not account for the jobs to be created through the National Cyber Force</li> <li>• Green Belt land should be released to meet employment needs, prioritising Grey Belt; site promoted at Mellor Brook which could include a phased mechanism for delivery.</li> <li>• Emphasis should be given to cyber corridor growth potential, including that around the Samlesbury Enterprise Zone.</li> </ul>	

<ul style="list-style-type: none"> <li>• Cumulative impacts of allocations on the strategic road network should be considered, including co-ordination with neighbouring authorities</li> <li>• The Local Plan should address how nature recovery can support a strong economy, both directly and indirectly.</li> </ul>	
EC2: Employment Allocations Chorley	Number of responses: 4
Main issues raised: <ul style="list-style-type: none"> <li>• Concerns that the identified employment and mixed-use allocations do not meet the identified needs for Chorley.</li> <li>• Concerns about the proposed allocation EC2.1 as it is situated on deep peat.</li> </ul>	
EC3: Employment Allocations Preston	Number of responses: 6
Main issues raised: <ul style="list-style-type: none"> <li>• Concerns raised over deliverability of EC3.2 owing to highways constraints identified by national highways, whilst cumulative highway impacts unclear in relation to delivery of EC3.2 and EC3.3</li> <li>• Plot sizes and site characteristics at EC3.3. unsuitable for sub-regional logistics of 9,300sqm and above</li> <li>• Additional employment land allocations required to meet sub-regional large-scale logistics needs; representor's promotion of alternative land at Stanworth (J3, M65).</li> <li>• Welcome production of HIAs and these should be added to site specific KDCs</li> <li>• Proposed modification to EC3.4 and accompanying KDCs to reflect proximity to National Grid Electricity Transmission assets, and overhead cable routes.</li> <li>• Identification of potential issues relating to utilities infrastructure and EC3.1; request that these are included within accompanying KDCs</li> <li>• Identification of potential impacts on the strategic road network in relation to some of the Preston allocations (including EC3.2 &amp; EC3.4)</li> <li>• EC3.3 should consider potential impacts to Red Scar and Tun Brook Woods SSSI</li> </ul>	
EC4: Employment Allocations South Ribble	Number of responses: 5
Main issues raised: <ul style="list-style-type: none"> <li>• The employment provision detailed within the mixed-use allocation at Cuerden (EC6), should be included within Policy EC4.</li> <li>• Proposed allocation EC4.1 is supported. Land is under control of Leyland Trucks and forms part of their long-term expansion and improvement strategy.</li> <li>• A modification is necessary within the Key Development Considerations for EC4.1 Land north of Lancashire Business Park pursuant to requiring a Flood Risk Assessment.</li> </ul>	
EC5: Mixed Use Allocations Chorley	Number of responses: 10
Main issues raised: <ul style="list-style-type: none"> <li>• Concerns regarding the highway impacts of a number of allocations that are located within reasonable proximity to each other.</li> <li>• Concerns about the split of residential and employment on allocation EC5.1.</li> </ul>	

<ul style="list-style-type: none"> <li>• Support for allocations EC5.3, but the southern boundary of the site allocation should be expanded to include the remaining existing safeguarded land.</li> <li>• Environment Agency advised that the amount of land allocated for housing on allocation EC5.7 should be reduced as the new flood mapping identifies that more of the site is in Flood Zone 3 than previously.</li> <li>• Support for allocations EC5.1, EC5.2 and EC5.5</li> </ul>	
EC6: Mixed Use Allocations South Ribble	Number of responses: 7
Main issues raised: <ul style="list-style-type: none"> <li>• Cuerden should be identified as a strategic employment site (as it is in the current adopted SR Local Plan)</li> <li>• Allocation of the site is generally supported but fails to detail that alternative uses on the site, other than employment, may be acceptable where they are necessary to fund essential infrastructure and could undermine future development of the site.</li> <li>• Cuerden site erroneously referenced on policies mapping as EC7.1 and should be EC6.1</li> <li>• EC6 is not justified, effective or consistent with national policy – question whether mixed use sites are appropriate for a variety of housing types and accommodation purposes</li> <li>• 25ha of Cuerden site will be used to support a new hospital site and the total amount of deliverable employment land should be adjusted accordingly. Alternative site at Stanworth put forward by representor to make up subsequent shortfall.</li> <li>• Accompanying KDCs need to include reference to National Grid overhead cable route</li> <li>• Number of strategic allocations are located in reasonable proximity to each other – National Highways expect a co-ordinated approach to impacts and mitigation to be required.</li> </ul>	
EC7: Protection of Existing Employment Sites	Number of responses: 3
Main issues raised: <ul style="list-style-type: none"> <li>• Many existing employment sites have viability issues and therefore an allowance should be made through additional employment land allocations</li> <li>• Ironworks and Fulwood Barracks should be removed from this designation</li> </ul>	
EC8: Rural Economy	Number of responses: 0
Main issues raised: <p>N/A</p>	
EC9: Skills and Economic Inclusion	Number of responses: 2
Main issues raised: <ul style="list-style-type: none"> <li>• Policy is supported, legally compliant and sound</li> <li>• Further consideration should be given to ‘green jobs and skills’</li> </ul>	

EC10: University of Lancashire	Number of responses: 1
Main issues raised: <ul style="list-style-type: none"> <li>• Development at the University Sports Arena is recommended to be in line with the policies of SS5</li> <li>• Student accommodation should be well served by public transport and National Highways should be consulted</li> <li>• The university land at the ironworks should be removed from the employment area mapping.</li> </ul>	
EC11: Retail Hierarchy	Number of responses: 3
Main issues raised: <ul style="list-style-type: none"> <li>• Cottam district centre should be reduced in size and/or amend existing designation</li> <li>• Change 'must' to 'should' in para 5.42</li> <li>• Local/district centres designated at Preston West and Northwest Preston have the potential to threatened due to vitality of centres outside of Central Lancashire</li> </ul>	
EC12: Preston City Centre	Number of responses: 5
Main issues raised: <ul style="list-style-type: none"> <li>• Mapping should be in line with the Stoneygate Masterplan SPD</li> <li>• Wording should be in line with NPPF to protect and enhance the historic environment</li> <li>• Policy supports health and active travel</li> <li>• Various uses should be amended to 'main town centre' uses</li> <li>• Add reference to Queen's Retail Park</li> <li>• HS4.6 should be required to make provision for pedestrian access to Queen's Retail Park</li> </ul>	
EC13: Development in Town Centres	Number of responses: 1
Main issue raised: <ul style="list-style-type: none"> <li>• Policy is supported as it supports improvements to public transport, sustainable, and active travel</li> </ul>	
EC14: Priorities for Tourism and the Visitor Economy	Number of responses: 3
Main issues raised: <ul style="list-style-type: none"> <li>• National Highways should be consulted on appropriate mitigation measures where there is potential for high volume of vehicles</li> <li>• Policy should make reference to policy EN7</li> </ul>	

## Chapter 6: Healthy and Inclusive Communities

HC1: Health and Wellbeing	Number of responses: 3
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Policy should recognise the health benefits that delivering older people’s housing can bring to individuals</li> <li>• Misconception that older person’s housing places additional burden on healthcare infrastructure</li> <li>• Older person’s housing can help to reduce the demands on health and social care services</li> <li>• Reference should be made to Sport England’s Active Design guidance</li> <li>• Access to the natural environment is linked to Health and Wellbeing and should be referred to in the policy.</li> </ul>	
HC2: Hot Food Takeaways	Number of responses: 2
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• No objections to policy</li> <li>• The policy could require applicants to demonstrate the wider economic, social, and environmental contribution they would make</li> <li>• The Council’s evidence relies on a disproportionate link between a single land use classification and the incidence of obesity in children</li> <li>• Criterion b) iii should be deleted as this effectively imposes a blanket ban on new hot food takeaways in most wards</li> <li>• Criterion b)iv should be modified to “Within 400m <i>walking distance</i> of a secondary school entrance, unless opening hours are restricted at school opening times, lunch times and school closing times”.</li> </ul>	
HC3: Community, Health, and Education Facilities	Number of responses: 5
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• On the emerging proposals map, colleges receive no specific designation, protection, or policy support</li> <li>• There appears to be no rhyme or reason for who receives a designation on the map under this policy</li> <li>• Policy HC3 is not an education specific policy and is therefore not a suitable replacement for Policy 14 of the Core Strategy</li> <li>• HC3 will weaken local planning policy for educational development</li> <li>• An education specific policy should be reintroduced.</li> <li>• New Hospitals are major public infrastructure projects and significant investments such as these and the benefits of improvements in the delivery of health and care services will be subject to a future public consultation</li> <li>• Council should work with ICB as well as Hospital Trust regarding new hospital development</li> <li>• NHS requires flexibility with regards to use of its estate – there should be no requirement to market health care buildings/sites for 6 months before disposal.</li> <li>• 6-month marketing period for community facilities not sufficient as would not allow time for a community group to fundraise.</li> </ul>	

HC4: Purpose Built places of Worship and/or Religious Instruction	Number of responses: 3
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• If any sites come forward which demonstrate an adverse impact on the highway network and SRN, National Highways should be consulted.</li> <li>• There are omission sites ready and available to support long term provision of community facilities in Preston</li> <li>• Any new purpose-built places of worship should not harm a heritage asset.</li> </ul>	
HC5: Provision of New Open Space, Sport, and Recreation Facilities	Number of responses: 4
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Any new open space, sport or recreation development should not harm a heritage asset. Amendment proposed to ensure this.</li> <li>• If sites come forward where there may be an impact on the SRN, National Highways should be consulted.</li> <li>• The Plan evidence base should include a robust and up-to-date assessment of open space requirements and opportunities</li> <li>• Consideration should be given to the quality and accessibility of open space.</li> <li>• The Plan should identify, designate, and have policies to protect and enhance areas of Local Green Space that are of particular importance to local communities.</li> <li>• Policy is unsound because it does not provide explicit support for larger developments that provide open space in excess of local plan requirements.</li> </ul>	
HC6: Protection of Existing Open Space, Sport, and Recreation Facilities	Number of responses: 1
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• There is ambiguity in terms of the “and” and “or” which describe which criteria need to be satisfied.</li> </ul>	
HC7: Cemeteries and Crematoria	Number of responses: 1
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• There may be a capacity shortfall within the plan period and a lack of cemetery provision for residents in north Preston.</li> <li>• There are omission sites ready and available that could be allocated to support long term provision.</li> </ul>	

## Chapter 7: High Quality Environment

EN1: Well Designed Places	Number of responses: 17
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Concerns have been raised that some of the criteria would not be appropriate for all schemes or proposals</li> <li>• Concerns raised on the definition of a significant scheme and the introduction of the Nationally Described Space Standards</li> </ul>	

<ul style="list-style-type: none"> <li>• Concern raised that reference to 'design codes' is unnecessary Part of the policy wording is vague and overly prescriptive</li> <li>• Concerns that proposals achieve all Building for a Healthy criteria is too rigid for all developments</li> <li>• National Highways, Historic England and United Utilities support the policy</li> </ul>	
EN2: Design Criteria for New Development	Number of responses: 6
Main issues raised: <ul style="list-style-type: none"> <li>• Policy wording is quite vague and not clear how to address compliance with the policy</li> <li>• Raise several concerns on the practical implementation of this policy and the proposed approach of giving priority to people over vehicles as part of all major development schemes.</li> <li>• Further guidance should be provided how public realm can be effectively accessed in terms of climate change resilience.</li> </ul>	
EN3: Tall Buildings	Number of responses: 2
Main issues raised: <ul style="list-style-type: none"> <li>• No objections to policy</li> </ul>	
EN4: Amenity	Number of responses: 3
Main issues raised: <ul style="list-style-type: none"> <li>• Insufficient justification for allocation SS5, and consider more flexibility required in Policy EN4.</li> <li>• United Utilities propose modifications to the wording of the policy.</li> <li>• Historic England supports the policy.</li> </ul>	
EN5: Green Infrastructure	Number of responses: 13
Main issues raised: <ul style="list-style-type: none"> <li>• Objections to the inclusion of certain sites as Green Infrastructure (GI), including land at Cardinal Newman College, land at Leyland St Mary's RC Church and Fulwood Barracks.</li> <li>• Concerns for the requirement of HMMPs and/or LEMPs for green infrastructure.</li> <li>• Consider the site at Harrisons Farm unsuitable for allocation as GI, and argue the site is more appropriate for housing.</li> <li>• Concerned there is insufficient allocation for off-site BNG.</li> <li>• Concerns that the policy is restrictive, such as to 'prioritise' GI, and the extent of mapping.</li> <li>• Representation proposes amendments to the policy and supporting document to strengthen the policy for swifts and other nesting birds.</li> <li>• Historic England consider the policy wording does not appropriately protect heritage assets.</li> <li>• Homes England request a modification to the housing numbers for allocation site EN5.2 'Central Parks'</li> <li>• Natural England support the policy.</li> </ul>	

EN6: Biodiversity Net Gain	Number of responses: 7
Main issues raised:	
<ul style="list-style-type: none"> <li>• Concerns raised over the wording of the policy requiring 'at least 10% net gain', with representations considering this is above the statutory requirement.</li> <li>• Concerns raised over the inclusion of the additional, local hierarchy for BNG delivery.</li> <li>• Concerns raised that the policy duplicates national BNG policy.</li> <li>• EA consider the terminology in the policy to be inconsistent with national policy.</li> <li>• Natural England generally support the policy.</li> </ul>	
EN7: Designated Sites for Nature Conservation	Number of responses: 4
Main issues raised:	
<ul style="list-style-type: none"> <li>• Concerns have been raised on the inclusion of 'Wildlife Corridors' as designated sites in the policy and supporting text.</li> <li>• Concern raised over possible confusion/duplication of national BNG policy and Policy EN6.</li> <li>• Liverpool Bay SPA should be removed from the list of designated sites in the policy.</li> <li>• The policy is sound.</li> </ul>	
EN8: Trees, Woodlands, and Hedgerows	Number of responses: 6
Main issues raised:	
<ul style="list-style-type: none"> <li>• Concerns raised around the restrictiveness and rigidity of compensatory tree and hedgerow requirements and its impact on viability of developments.</li> <li>• Representations consider the policy requirements duplicate national BNG policy requirements.</li> </ul>	
EN9: Species Protection	Number of responses: 1
Main issues raised:	
<ul style="list-style-type: none"> <li>• Factual correction proposed to remove reference to Natural England as a statutory consultee for applications affecting protected species.</li> </ul>	
EN10: Development and Flood Risk	Number of responses: 7
Main issues raised:	
<ul style="list-style-type: none"> <li>• Part 1 is not consistent with the PPG and should be amended to avoid misinterpretation</li> <li>• Level 2 SFRA is based on outdated mapping</li> <li>• Para 2 should be in line with the wording of para 181 of the NPPF</li> <li>• Additional text requested for sewer flood risk and where SFR has been identified site specific wording/ key development considerations should be added</li> <li>• Where flood risk is modelled and/or record of flooding on site then additional text should be added.</li> <li>• Policy wording would potentially prevent delivery of off-site natural flood management or flood stores for neighbouring development which in contrary to NFRMP</li> <li>• Part 4 and paragraph 7.67 is inconsistent with the PPG</li> </ul>	

<ul style="list-style-type: none"> <li>• Parts 2 and 4 of the policy be amended to be consistent with national guidance.</li> <li>• Para 7.66 should be re-worded &amp; 7.67 of the supporting text should include reference to and a summary of flood resilience considerations in addition to flood resistance.</li> </ul>	
EN11: Water Resource Management	Number of responses: 2
Main issues raised: <ul style="list-style-type: none"> <li>• Amendments should be made to Part 3 of the Policy and wording to be moved to supporting text.</li> <li>• Flood risk and surface water management should be two separate policies.</li> <li>• Amendments should be made to Policy EN11 and the inclusion of additional supporting text.</li> </ul>	
EN12: Protecting Groundwater Source Protection Zones	Number of responses: 1
Main issue raised: <ul style="list-style-type: none"> <li>• Amendments requested for additional explanatory text be included. For sites located in a SPZ or on water catchment land, request that the key development considerations / site-specific policy identify the constraint and the need for development to be appropriately mitigated / managed.</li> </ul>	
EN13: Heritage Assets and Archaeology	Number of responses: 3
Main issues raised: <ul style="list-style-type: none"> <li>• Concerns that the policy does not address the proposals that would have less than substantial harm on a heritage asset and is not consistent with NPPF.</li> <li>• Policy does not contain any strategy and locally specific policies that demonstrate area priorities for the historic environment in Central Lancashire</li> <li>• Concerns that the policy does not address archaeology, conservation areas and levels of harm.</li> <li>• Policy wording will exclude all listed buildings within the strategic site allocations.</li> </ul>	
EN14: Environmental Quality	Number of responses: 5
Main issues raised: <ul style="list-style-type: none"> <li>• Significant harm should be defined for clarity</li> <li>• Policy does not consider water quality</li> <li>• Policy does not reference unstable land which has a specific policy in the Chorley Local Plan and South Ribble Local Plan</li> <li>• Development will need to demonstrate these impacts on protected species and designated sites are suitably addressed through sensitive layout provisions and the use of a Construction Environment Management Plan (CEMP)</li> </ul>	
EN15: Areas of Green Belt.	Number of responses: 10
Main issues raised: <ul style="list-style-type: none"> <li>• Support approach to major developed sites in the Green Belt.</li> </ul>	

<ul style="list-style-type: none"> <li>• Local interpretation of &gt;30% of the original building as a disproportionate addition is too restrictive.</li> <li>• Policy should be deleted as it is superseded by 2024 NPPF.</li> <li>• The definition of facilities should not be restricted to buildings.</li> <li>• The local definition of materially larger is too restrictive.</li> <li>• The definitions of limited and infill are not justified</li> <li>• The term village should include settlements within Tier 3.</li> <li>• A Green Belt Assessment should not be required for NPPF paragraph 154g development</li> <li>• Policies should positively enhance land within the Green Belt particularly in urban fringe landscapes.</li> </ul>	
EN16: Protection of Agricultural Land	Number of responses: 2
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• The threshold for submission of an Agricultural Land Classification Report should be raised.</li> <li>• Support policy and its aims to protect best and most versatile agricultural land.</li> <li>• Plan should have a policy for sustainable management of soils</li> <li>• Consideration of deep peat should be considered in the policy wording.</li> </ul>	
EN17: Development in the Open Countryside	Number of responses: 6
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Policy position will have implications for Councils' housing supply.</li> <li>• Policy needs amending to acknowledge it will not apply if the Council cannot demonstrate a 5-year housing land supply.</li> <li>• Any new development in the open countryside should not harm a heritage asset. Policy wording should be consistent with NPPF in this regard.</li> <li>• Support for policy as it no longer includes infill sites.</li> </ul>	
EN18: Areas of Separation	Number of responses: 10
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• Inconsistent with national policy</li> <li>• Insufficient evidence provided as to why Areas of Separation boundaries have been extended.</li> <li>• Suggests Areas of Separation are de facto Green Belts.</li> <li>• Consideration of character of settlements should be specific rather than a blanket approach.</li> <li>• Areas of Separation should be reduced to remove sites with planning permission.</li> <li>• Policy layer should be updated to exclude land west of Garstang Road, Broughton which has planning permission</li> <li>• No justification for including land off Longridge Road, Grimsargh in an Area of Separation.</li> <li>• Support policy approach and strengthening of Areas of Separation</li> <li>• The Areas of Separation should be further extended.</li> <li>• Policy should ensure that development reflects the character of the countryside and enhances access to nature.</li> </ul>	

EN19: Landscape Character	Number of responses: 1
Main issues raised:	
<ul style="list-style-type: none"> <li>• Plan should give great weight to preserving / enhancing landscapes.</li> <li>• Policy should require development in sensitive landscape areas to meet the highest design standards and improve access to nature.</li> <li>• Policy should define major development and consider how development will be managed in the setting of a designated landscape</li> <li>• Plan should include policy on light pollution.</li> </ul>	

## Chapter 8: Climate Change and Sustainable Energy

CC1: Climate Change	Number of responses: 10
Main issues raised:	
<ul style="list-style-type: none"> <li>• Policy requirement to maximise opportunities to deliver net zero greenhouse gas (GHG) emissions and to require an Energy Statement go beyond national policy and is not justified. Meeting the appropriate target may not be achievable in all cases, including due to viability, and therefore appropriate flexibility is required.</li> <li>• Policy does not provide sufficient clarity regarding requirements and is inconsistent with the Future Homes Standard (FHS).</li> <li>• Support given to reduce energy use and improve energy efficiency in development, but only in line with the December 2023 Written Ministerial Statement (WMS). No reference made to the FHS / Future Buildings Standard (FBS).</li> <li>• Insufficient details relating to the calculation of whole life cycle (WLC) carbon emissions and what levels of reduction are to be sought.</li> <li>• Viability Assessment does not include costs for undertaking WLC carbon assessments.</li> <li>• Insufficient details of monitoring and associated implications.</li> <li>• A transitional period should be included within the policy.</li> <li>• Climate change should be addressed through Building Regulations, rather than Local Plan policy.</li> <li>• Policy is too prescriptive, overly rigid, and ineffective.</li> <li>• Any proposals aimed at tackling climate change should not harm heritage assets.</li> <li>• Support for the policy, and its contributions to helping supporting health and wellbeing, and opportunities to work with nature-based solutions.</li> </ul>	
CC2: Renewable Energy Generation and District Heating Networks	Number of responses: 2
Main issues raised:	
<ul style="list-style-type: none"> <li>• Policy generally supported but should align with NPPF paragraph 160.</li> <li>• Any proposals should not harm heritage assets.</li> </ul>	
CC3: Reducing Energy Consumption	Number of responses: 6
Main issues raised:	
<ul style="list-style-type: none"> <li>• Policy wording does not provide sufficient clarity regarding its requirements and is inconsistent with the FHS / BHS.</li> </ul>	

- It should not be necessary for all major developments to produce an Energy Statement, and where this is required, a proportional approach to information should be required.
- Details around WLC carbon emissions assessment requirements are questioned – councils should work with nationally set standards rather than introducing alternative requirements.
- Question value of parts 3 & 4 of the policy as they are addressed elsewhere
- Climate change requirements should be addressed through Building Regulations rather than Local Plan policy.
- Policy is inconsistent with FHS and does not provide sufficient clarity in respect of policy requirements.

**Chapter 9: Sustainable Travel**

ST1: Strategic Transport Priorities	Number of responses: 1
Main issues raised:	
<ul style="list-style-type: none"> <li>• Policy is supported.</li> </ul>	
ST2: Sustainable and Active Travel	Number of responses: 8
Main issues raised:	
<ul style="list-style-type: none"> <li>• Modifications to criteria 4 and 5b are necessary to be consistent with NPPF paras 58 and 116, respectively.</li> <li>• Criteria 2d, 4, 5c and 7 lack clarity.</li> <li>• Traffic near Hutton Grammar school is bad, particularly at school times. A new roundabout off Ratten Lane would decrease the risk of traffic accidents at the Anchor Pub and opposite the school.</li> <li>• Every home built in Longton makes it less safe to bike in the area.</li> <li>• Chapel Lane suffers congestion, particularly at school opening/closing. There should be an access from the A59.</li> <li>• Support for policy.</li> </ul>	
ST3: Parking Standards	Number of responses: 2
Main issues raised:	
<ul style="list-style-type: none"> <li>• Supports policy</li> <li>• 2/3 bed houses are required to provide 2 car parking spaces. Schools are required to provide 2 spaces per classroom.</li> <li>• In the rural area, more people are car dependent. A 3-bed home should provide 3 car parking spaces.</li> <li>• Frequent parking/congestion problems around schools is a threat to child safety. Schools should therefore include a car park.</li> </ul>	

## Chapter 10: Infrastructure Delivery

ID1: Infrastructure Planning Principles	Number of responses: 7
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• The Plan does not identify how infrastructure will be provided to meet demands from additional housing</li> <li>• Local infrastructure cannot cope with proposed allocations, impact on highways, schools, doctors, dentists, and the environment should be considered.</li> <li>• Development at Chapel Lane, Longton will exacerbate drainage/ sewage issues in the locality</li> <li>• S106/ CIL contributions may be required to support infrastructure or development costs for new health facilities.</li> <li>• Developers should be encouraged to work together to address drainage issues across major sites on a site wide basis.</li> <li>• Phasing strategies may be required on larger sites to reduce impact on the strategic road network.</li> </ul>	
ID2: Developer Contributions and Planning Obligations	Number of responses: 11
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• As drafted, it is unclear what would happen if a development were unviable.</li> <li>• S106 monitoring fees should be fair and reasonable.</li> <li>• Financial contributions requested should meet the tests in the NPPF</li> <li>• Biodiversity offsetting contributions should not be included as they are covered by BNG legislation.</li> <li>• CIL must not result in developments being subject to double charging.</li> <li>• Heritage assets should be included on the list of developer contributions.</li> <li>• S106 / CIL may be required to support construction of new health facilities.</li> <li>• The policy accounts for healthcare infrastructure needs arising from housing growth.</li> <li>• Mitigation may be required on the strategic road network which the policy allows for.</li> </ul>	
ID3: Digital and Communications Infrastructure	Number of responses: 2
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• The inclusion of digital infrastructure such as high-speed broadband is not within the direct control of the development industry so this policy could create deliverability issues.</li> <li>• No need for inclusion of part 2 of the policy as it is covered by Building Regulations.</li> <li>• Any proposal for digital and communications infrastructure should not harm a heritage asset. The policy should reflect the wording of the NPPF in relation to the historic environment.</li> </ul>	

## Appendices

Appendix 2: Monitoring Framework	Number of responses: 4
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• The Monitoring Framework does not provide details on how it will be monitored and how actions will be taken to address any issues identified by the monitoring.</li> <li>• There are no sections on how the historic environment will be monitored.</li> </ul>	
Appendix 3: Housing Trajectories	Number of responses: 5
<p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• The trajectory has an additional supply which equates to an allowance of 9%. There should be a buffer of at least 20% to provide flexibility in the housing land supply.</li> <li>• Objective 3 should state the Councils are seeking to surpass housing needs, not just meet them</li> <li>• Objective 9 should not state that the Councils will seek to conserve and enhance un-designated landscapes</li> <li>• Request for the exact supply of homes and their trajectory can be provided at examination</li> <li>• Homes England have provided trajectories for the sites they own</li> </ul>	

## Evidence

Evidence	Number of responses: 16
<p>Main issues raised:</p> <p>Integrated Appraisal:</p> <ul style="list-style-type: none"> <li>• Historic England disagrees with the IA against objective 16B in relation to Policy HS6, HS11, HS13, EC12, EN5, EN13, HC4, HC5, EN17, CC1, CC2, ID2, ID3</li> <li>• In relation to the IA, Natural England recommend a list of types of plans relating to the natural environment are considered</li> <li>• IA has not included reference to areas of opportunity which can influence decision making and policies</li> <li>• Table 3.1 of the IA should fully reflect IA11 and policies referring to green infrastructure</li> <li>• Natural England recommends the relationship between land and natural resources and IA11: Biodiversity and geodiversity and climate change resilience is included</li> <li>• Natural England have suggested some changes to the objectives of the IA.</li> <li>• It is a legal requirement that agricultural land proposed for development is assessed for its viability and then graded accordingly. This has not been clarified in the information regarding the proposal.</li> <li>• The IA fails to meet the requirements of National Planning Policy</li> <li>• Council has placed greater importance on avoiding Green Belt release through the plan rather than directing development away from areas at risk of flooding</li> <li>• The SA cannot be considered to fully undertake a comparative and equal assessment of each reasonable alternative if fundamental evidence base documents are not published for review.</li> <li>• The SA process must clearly justify policy choices in meeting the development needs of the area and be clear from the results of the assessment why some policy options have been progressed or rejected.</li> </ul>	

- Object to Integrated Appraisal Process and the identification and assessment of reasonable alternatives.
- The LHN indicates that Chorley has the greatest requirement for housing, and the approach being taken by the Council to redistribute this fails to consider the socio-economic and environmental impact of this
- IA does not give enough weight to economic and social objectives.
- Consider the IA to be inadequate and legally non-compliant; IA fails to adequately, accurately, and consistently test reasonable strategic options and specific sites.
- The plan is not based on an appropriate strategy, taking into account reasonable alternatives. There has been insufficient evidence provided to show that the proposed allocations are the most sustainable or appropriate option compared to other reasonable alternatives
- The Plan may be in breach of the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), particularly Regulation 12, which requires that a Strategic Environmental Assessment (SEA) be undertaken to assess the likely significant effects of the plan on the environment
- Revise Environmental Report to include a more robust assessment of cumulative impact and assessment of reasonable alternatives
- Amend wording to more explicitly support active travel, public transport, climate resilience and BNG.
- Revision to SA to ensure that land of Hugh Barn Lane is properly and fairly assessed.

#### Viability:

- Pragmatic scenarios modelled in Viability Study are too optimistic
- Abnormal costs should be modelled on greenfield sites
- A developer's profit of 20% should be modelled.
- The Main Viability Report is misleading as the baseline testing is labelled "Worst Case Scenario" whilst the preferred testing is labelled "Pragmatic Scenario." This creates a perception that the "Worst Case Scenario" is of limited worth, which is not the case.
- The pragmatic scenario has different assumptions than the worst-case scenario
- The reference to the BLV caveat is contrary to PPG: Viability
- The report adopts the same unit typology for all housing developments in low, medium, and higher value areas, including 7% 1 and 2-bed apartments.
- The report assumes Net Site Area for brownfield sites is 100% of the Gross Site Area whilst greenfield sites have a Net Site Area equating to 75% of the Gross Site Area.
- There should be variation in unit typology for different value areas
- Little regard given to current asking prices of new build properties
- The report adopts BLVs based on Net Developable Site Areas. Landowners however expect payment for the full Gross Site Area. BLVs should be assessed on this basis.
- No cash flows are provided to support the appraisals in Appendix 8.
- Viability Appraisals for the four strategic sites are not included.
- Plan should include provisions for site specific viability testing to reduce the affordable housing provision and/or S106 contributions, dependent upon the circumstances of each site, due to the lack of policy compliant viability shown within the Council's evidence
- No abnormal costs are applied to greenfield sites. This is unrealistic. All sites incur abnormal costs whether brownfield or greenfield.
- Legal fees and interest costs are too low
- The consultation period on this study was too short.

Open Space/Playing pitches:

- The 2018 Playing Pitch Strategy identifies a need for provision linked to housing growth across Preston. This is some distance from Eastway site. Pitches should be located in NW Preston where the majority of development will be.
- Allocations on or affecting sports sites should be based on an up to date Playing Pitch Strategy.
- New developments should contribute towards meeting the demand generated through the provision of on-site facilities and/or providing additional capacity off site. This should be informed by a robust and up to date evidence base.

Infrastructure Delivery Plan:

- Currently some gaps and missing information in the IDP.

Flood Risk:

- LCC would welcome further information in relation to the wording that will be included in relation to sites where there has been a Level 2 SFRA.

**Duty to Cooperate**

Duty to Cooperate	Number of responses: 2
<p>Main issues raised:</p> <ul style="list-style-type: none"><li>• Councils have not been sufficiently engaged with neighbouring authorities and fail the Duty to Cooperate.</li><li>• There is insufficient documentation of co-operation with neighbouring LPAs.</li></ul>	