

Response ID ANON-XXXX-WABS-5

Submitted to Central Lancashire Local Plan Regulation 19 Representation Period
Submitted on 2025-04-06 22:32:07

Part A: Personal Details

1 What is your title?

Mr

2 What is your first name?

First Name:

Neil

3 What is your last name?

Last name:

Smith

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

Job title:

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

Organisation:

6 What Authority do live/work in?

[REDACTED]

7 What is your address?

Address line 1:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 What is your email address?

Email:

[REDACTED]

Part B: Representation

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

Appendix

Chapter 4: Balanced Housing Market

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

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

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48 Do you consider the Central Lancashire Local Plan is:

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

Yes

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

No

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

Yes

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

No

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

No

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

Yes

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

Yes

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

Policy HS1: Legal Compliance:

The CLLP is not Justified – it does not take into account the reasonable alternatives, and based on proportionate evidence as follows:

Representation 1

4.15 states "The CLLP housing requirement is based on an employment-led scenario". This would result in an allocation of housing requirements across each of the council areas as set out in para 4.19 Table 1 as follows: Chorley 7,380; Preston 7,938 ; South Ribble 6,948. The CLLP however includes the following housing requirements across each of the council areas - Chorley 6,012; Preston 9,360; South Ribble 8,280.

There is clearly a contradiction here with no justification on why Chorley requirements have been reduced by 1,368 with Preston and South Ribble increasing by 1,422 and 1,332 respectively increasing the overall requirement by 1,386.

Representation 2

Reasonable alternatives are available.

4.16 states "The reuse of brownfield land and town and city regeneration are key priorities"

4.24 iii states "sites located within the Green Belt (with the exception of previously developed sites in the Green Belt) were 'parked' "

The CLLP is not sound as reasonable alternatives, namely the former Camelot Theme Park at Charnock Richard, is a prime example of a brownfield site or by definition a previously developed site in the green belt.

Representation 3

The CLLP cannot be effective in its current form relating to Chorley, Preston and South Ribble as it will be undeliverable due to the wholesale reorganisation of all 15 Lancashire councils within the next few years. This is clearly putting the cart before the horse as it would provide greater clarity if the newly created councils develop their own plan once established.

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

HS1: Modifications:

Representation 1 Compliance

To make the CLLP sound housing allocations across each council area need to reflect the evidence based on the Employment led scenario as stated in 4.15 ie Chorley 7,380; Preston 7,938 and South Ribble 6,948. If a further need is identified (1,386) this should be pro-rata to the above evidence based allocation.

Representation 2 Compliance

Include the former Camelot Theme Park at Charnock Richard as a potential site for housing development. This would contribute to balancing the non compliance at Representation 1 above.

Representation 3 Compliance

To ensure the plan is deliverable it should be postponed being approved until the new Lancashire councils are created.

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

Yes

South Ribble Site Allocations

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

site allocation reference:

HS3.2

281 Do you consider the Central Lancashire Local Plan is:

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Yes

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No

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

Yes

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

No

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

Yes

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

Yes

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

Yes

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South Ribble site allocations: soundness/legality/DtC:

HS3.2 approx 435 houses

This site is not justified as any Stage 2 assessment undertaken to determine if they are suitable, available, and achievable would clearly show this site is unsuitable due to the potential effect on traffic in the local community.

Highways 5 states "Proposals should facilitate the safe and efficient movement of vehicles. Development shall ensure:

d) motorised traffic generated by development is appropriate to the type and nature of the routes available and that there is no adverse impact on the local community"

The appendix in the plan already refers to potential flooding but it also states:

"There are constraints in relation to the highways which surround this site. Brook Lane is a narrow single-track road with poor visibility. Church Lane is relatively narrow, and visibility is impacted by the railway bridge. However, there are options to secure suitable site access, potentially from Chain House Lane or Coote Lane"

Any access / egress on Chain House Lane or Coote Lane will create further traffic flow issues throughout the day but certainly in the morning, evening and school times. More importantly the vast majority of traffic will flow onto the A582, an already overburdened major road. When coupled with site 3.5, approx 200 houses, it will result in further gridlock for local residents. The plan is not therefore justified as there will be an adverse impact on the local community.

This site when coupled with site 3.5 is a total of 635 houses which represents some 7.7% of all South Ribble housing requirements. Both sites are within 0.5 mile of each other. Traffic from these sites will clearly have a significant detrimental impact on the local community which cannot be justified in the CLLP.

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

South Ribble site allocations: modifications:

Site 3.2 is unsuitable as shown above. Further consideration should be given to an alternative site at the former Camelot Theme Park at Charnock Richard which would also go some way to rebalance the housing allocations across the three councils as per the evidence based Employment led scenario figures.

284 Do you wish to make another representation?

Yes

Appendix

285 Which section of the Appendix would you like to make a representation about?

appendix:
Appendix 4

286 Do you consider the Central Lancashire Local Plan is:

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

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No

Spatial Vision: Soundness/legal/DtC - a) Positively prepared:
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Spatial Vision: Soundness/legal/DtC - b) Justified:
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Spatial Vision: Soundness/legal/DtC - c) Effective:
Yes

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

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

287 Please give details of why you consider the Central Lancashire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Central Lancashire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

appendix: soundness/legality/DtC:

Site 3.5 approx 200 houses

This site is not justified as any Stage 2 assessment undertaken to determine if they are suitable, available, and achievable would clearly show this site is unsuitable due to the potential effect on traffic in the local community.

Highways 5 states "Proposals should facilitate the safe and efficient movement of vehicles. Development shall ensure:

d) motorised traffic generated by development is appropriate to the type and nature of the routes available and that there is no adverse impact on the local community"

The appendix in the plan already refers to potential flooding but it also states:

"Suitable vehicular access should be achievable from Church Lane"

Any access / egress on Church Lane will create further traffic flow issues throughout the day but certainly in the morning, evening and school times. More importantly the vast majority of traffic will flow onto the A582, an already overburdened major road. I fail to see what work a planning application could include to "to ensure appropriate access points and local highway network mitigation" as per the appendix.

Ironically the Appendix for site 3.2 states "There are constraints in relation to the highways which surround this site. Brook Lane is a narrow single-track road with poor visibility. Church Lane is relatively narrow, and visibility is impacted by the railway bridge. It is somewhat surprising that this description of Church Lane being relatively narrow and there are constraints in relation to highways which surround the site is omitted from the appendix relating to site 3.5!

When coupled with site 3.2, approx 435 houses, it will result in further gridlock for local residents. The plan is not therefore justified as there will be an adverse impact on the local community.

This site when coupled with site 3.2 is a total of 635 houses which represents some 7.7% of all South Ribble housing requirements. Both sites are within 0.5 mile of each other. Traffic from both these sites will clearly have a significant detrimental impact on the local community which cannot be justified in the CLLP.

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appendix: modifications:

Site 3.5 is unsuitable as shown above. Further consideration should be given to an alternative site at the former Camelot Theme Park at Charnock Richard which would also go some way to rebalance the housing allocations across the three councils as per the evidence based Employment led scenario figures.

289 Do you wish to make another representation?

No

Declaration

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

Not Answered

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

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

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

why participation is necessary:

There needs to be sufficient local representation at examination hearing sessions.

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

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

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

Yes

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

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

Yes

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