

# Response ID ANON-XXXX-WAFC-S

Submitted to Central Lancashire Local Plan Regulation 19 Representation Period  
Submitted on 2025-04-12 16:52:25

## Part A: Personal Details

1 What is your title?

Mr

2 What is your first name?

First Name:  
William

3 What is your last name?

Last name:  
Taylor

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?

Chorley Site Allocations

Chorley Site Allocations

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

site allocation reference:

HS2.36

271 Do you consider the Central Lancashire Local Plan is:

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

Yes

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

No

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

No

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

No

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

No

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

No

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

No

272 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.

Chorley site allocations: soundness/legal/DtC:

This site is unsuitable for the allocated number of properties for the following reasons: means of access and egress; connection to wider transport network; Site Gradients; Site Density Assessment. I am also very concerned as to the process allowed for discussions about individual sites at this stage. Means of Access and Egress: The site analysis at pages 204-5 of the consultation document reports that 'Suitable vehicular access should be possible from Delph Way / Cross Keys Drive.' The two streets mentioned comprise a mix of access roads of width 5.5m to 5.7m, with a 2m wide footway on either side ( Cross Keys Drive, central and northern section and Delph Way, West section) , and shared surfaces of between 4.35 and 4.7m with no footways ( Cross Keys Drive south section, Delph Way north and south sections). There are 4 potential access points from these streets to the site. Three of these (the southernmost points) are from the shared surface streets. This street type is intended to serve no more than 25 dwellings and be no more than 125m long. The existing shared surfaces on the estate are, in effect, 'Homezones' with signage indicating children playing in road. As the published guidance for such roads emphasises, the lack of separation from vehicles on these roads can cause issues for people with visual or mobility problems, and it is vital that vehicular speeds are kept naturally very low and they are not used to access substantial numbers of properties. The lowest of the possible access points is a shared surface already of c111m existing length, servicing 17 dwellings. Therefore, its potential to provide access to more properties is severely limited. The remaining 2 shared surface access points would require significant modification to provide adequate access. None of them is suitable for accessing significant numbers of new properties. The fourth access point, the most northerly, accesses the proposed site at its highest point – see comments below on gradient. None of the possible access points provide direct connection to the site, with all requiring other land to be purchased, which is not certain to be available to enable the development.

The streets already suffer from on-street and on-pavement (where these are present) parking. This severely restricts use of the pavements at times and presents a hazard for pedestrians conflicting with cars, never mind larger vehicles and service / delivery vans etc. The increase in traffic implied by this significant number of proposed extra properties will increase the hazard for pedestrians and other road users to an unacceptable degree.

Residents have suggested an alternative means of access to the site, through the proposed site leading onto Town Lane (designated HS2.35 in the current proposed plan). This already has a planning consent for 250 units, and is currently subject to a revised application for an extra 30 units. This site has an internal distributor road layout within it (5.5m carriageways with 2 x 2m footways) which could be easily linked to the bottom part of the subject site (2.36). The subject site would then find egress much better in times of poor winter conditions. Town Lane has been designated by the Highways Authority (and a Planning Inspector) as having capacity for the new site (subject to some detailed internal adjustments, but without queries as to Town Lane capacity). This alternative access suggestion for HS2.36 was made by the writer to Chorley Borough Council (CBC) in 2023 during the Plan's Site Review process and during the period when the initial Town Lane site layout was being considered. Whilst linkage to the wider highways network via Town Lane is by no means without issues, it makes more sense than accessing it via shared surfaces, steep gradients and Chorley Old Road. Pedestrian only access to Chorley Old Rd via Carwood Lane, Cross Keys Drive and Delph way could, of course, be provided without issue.

Connection to the wider transport network. The position of the site means that most of the journeys from it are likely to be by private car. This can be evidenced by current usage and journeys from the site. A survey in 2021 indicated peak time vehicle movements significantly in excess of the level predicted by the 'standard' modelling. Over twice as many vehicle movements were made compared to pedestrian movements. The proposed site, with its gradient up to exit the area of new development, would be even less attractive to walk from. The nearest bus route along Chorley Old Road is poorly served, and the time taken (and extra gradient encountered) to walk to the A6 would deter many potential public transport users, especially if their walk would start from the lower part of the new site, some 27m vertically below the top of the site via the only access street with footways. There is already a significant parking issue at the already limited visibility junction of Chorley Old Road and Carwood Lane which is the only vehicular route to the wider road network. Chorley Old Road itself has a constant problem with parked cars (many of the properties facing it have no in-curtilage parking) and footways are frequently obstructed for pram and wheelchair users, with diversions to walk along the carriageway frequently required.

Site Gradients. The site slopes significantly from northwest to southeast. From the point of possible access at the head of the carriageway with footways (the only street that could provide a route for a significant number of additional dwellings) the sloped are very pronounced. The site falls away by 23 to 27 metres vertical at gradients of between 10% and 16%. To serve a cul-de-sac by this means is against good site design principles, giving severe egress difficulties in poor winter weather. There are already significant issues on the untreated carriageways on the estate in periods of snow and ice, with some stretches (with much less severe gradients) quickly becoming dangerous. The slope is also significantly more than is recommended for accessibility of pedestrians, especially with prams etc, and most especially for wheelchair users.

Site Density Assessment. If the site HAS to be considered for development, mitigation of the slope would require significant land to be taken up with roads and groundworks. This would reduce the capacity of the site far below the 102 dwellings currently proposed to be allocated. Based on discussions with CBC, the allocation is based on the 'standard' overall density assumed for suburban sites, without any individual site constraints being considered. Is this appropriate, especially given the access issues detailed above? If the site is to proceed in the planning process, and the number of units allocated to it contribute to the meeting of an overall target for units deliverable, should not the assessment take account of the 'real world' site constraints rather than using some arbitrary target that may well be significantly over-optimistic? The 102 'target' equates to 27 dwellings per hectare (dph). By comparison, other

proposed sites in the Parish with similar or better topography have proposed densities of 16dph (Site 2.37), 15dph (Site 2.35- based on the actual layout / density proposed by the developer) and 11dph (Site 2.34)

Duty to Co-operate. Representations made during consultation period. The issues noted above have been raised with both CBC (as Planning Authority) and Lancashire County Council ('LCC' - as Highways Authority). LCC have confirmed they 'have not raised any concerns' about the access via Cross Keys Drive and Delph way but have declined to enter into discussions or meet in their offices or on site to fully understand the concerns of residents. CBC say they rely on the LCC access assessment and will consider the matter (and any others raised) if and when a planning application is made. This is unsatisfactory and betrays the very concept of 'consultation'. A similar answer was given several years ago at the previous stage when sites were originally included - things would be considered in more detail later in the process. If issues are not taken into account at this stage, there is a danger that when an application IS made, it will be based on unrealistic expectations as to site accessibility and capacity. Sites should surely only proceed into the adopted plan if they can reasonably be developed with the access arrangements and for the capacity indicated in the plan. I would submit that in this case these criteria are not met and therefore the site should be reviewed and at least adjusted as part of this forward planning process, not when an application is made at some time in the future.

273 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.

Chorley site allocations: modifications:

I would respectfully urge the Inspector to consider the following modifications:

Either:

- Removal of the site in its entirety from the proposed plan due to the lack of adequate access via Delph Way and Cross Keys Drive and/or
- Significant reduction in the number of dwellings designated as appropriate for the site due to site topography and access and/or
- Consideration of access for some or all of the proposed 2.36 site to Town Lane via the proposed 2.35 site to improve suitability and egress during poor winter weather.

274 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:

To offer illustrations of the issues detailed above (not possible to add in this format) and to ensure balanced consideration of the access issues is possible.

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

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

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

Yes

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

Yes

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

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