Central Lancashire Local Plan - Regulation 19 Consultation Responses
Council's Representation Summary and Council's Action / Comments

Sort: By Plan / Policy

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Contents / General Plan				Count of Representations against this policy/section: 13		
A17.1	Rep'r: Persimmon Homes and Charles Church Lancashire Org.: Persimmon Homes and Charles Church Lancashire Agent: Stephen Harris	Policy: Contents / General Plan Site:	The Local Plan Plan Period proposed is 2023 – 2041 and should be extended to 2042 as a minimum to be considered sound.	The Plan period is 2023 to 2041. The housing trajectories at Appendix 3 of the Local Plan show that there are three pre adoption years (2023/24 to 2025/26) followed by 15 years (2026/2027 to 2040/41). The approved Local Development Scheme (LDS) 2024 indicates adoption by no later than 31st December 2026, thereby falling within the first year of the year 1-5 period. The Local Plan remains on track against the local plan preparation stages and timings set out in the LDS.	No	Yes
A17.7	Rep'r: Persimmon Homes and Charles Church Lancashire Org.: Persimmon Homes and Charles Church Lancashire Agent: Stephen Harris	Policy: Contents / General Plan Site:	We consider that the way the local authorities have approached the preparation of the Local Plan is not legally compliant for the following reasons: 1.1 The Local Plan is being prepared under section 28 of the Planning and Compulsory Purchase Act 2004 (“Act”). Section 28 of the Act requires that anything that is done by one of the local planning authorities in connection with a local plan must be done by each of them. Accordingly, the Local Plan will be required to be adopted by a separate decision of each local authority and will comprise three separate local plans that	The councils consider that the Plan is legally compliant and has been prepared in accordance with the Regulations.	No	Yes

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						have been concurrently prepared. 1.2 A formal joint committee of the local planning authorities has not been established under section 29 of the Act. Therefore, the Local Plan is not a single joint local plan. 1.3 Paragraph 234 of the NPPF refers to a single plan and not numerous concurrently prepared plans. Accordingly, the Local Plan does not fall within the scope of paragraph 234 of the NPPF and cannot be prepared in accordance with the previous version of the NPPF.			
A26.15	Rep'r	Miss Georgina Cox	Policy	Contents / General Plan		Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with. The representor notes that strategic matters relating to the preparation of the CLLP were most recently discussed with neighbouring authorities in November 2024, prior to the publication of the new Framework in December 2024.	The Councils have successfully discharged their duties with regards the Duty to Cooperate as set out in the Localism Act 2011 section 110 (inserted into Part 2 of the Planning and Compulsory Purchase Act 2004 (local development) Section 33A. The Councils have engaged constructively, actively and on an ongoing basis with all neighbouring Councils in addition to prescribed bodies. The Councils have also fully complied with the provisions of NPPF including demonstrating effective and on-going joint working, by preparing and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating	No	Yes
	Org.	Gladman Developments	Site						
	Agent								

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			The introduction of the new Local Housing Need (LHN) figure has seen significant increases in housing need requirement across neighbouring authorities. These changes have and will continue to impact the ability of neighbouring authorities to demonstrate a five-year housing land supply. The introduction of the new Local Housing Need (LHN) figure has seen significant increases in housing need requirement across neighbouring authorities. These changes have and will continue to impact the ability of neighbouring authorities to demonstrate a five-year housing land supply. Therefore the Central Lancashire Authorities should conduct further DtC meetings with neighbouring authorities to discuss the implications of the LHN at a strategic level and to reconsider their approach to cross-boundary strategic housing delivery including the potential for the CLLP to take on unmet need for neighbouring authorities.	to address these.		
A26.16	Rep'r Miss Georgina Cox Org. Gladman Developments Agent	Policy Contents / General Plan Site	Gladman consider the CLLP fundamentally unsound in its current form. It is evident that progress of the CLLP has been accelerated so that it proceeds under the previous National Planning Policy Framework (2023) ('Framework') to evade the increased local housing need (LHN) introduced by the revised standard method. As a result, the proposed housing requirement is inadequate and will not address the	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the	No	Yes

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			actual housing needs of the area and will also stymie economic productivity and development ambitions in Central Lancashire as a result. The Government has emphasised its position that local authorities should not be submitting deficient plans for examination believing the Planning Inspectorate will use significant time and resource to address fundamental soundness issues. Given our concerns in respect of both the severity of soundness issues and failure to evidence comprehensive cooperation, Gladman assert that the CLLP should not be submitted for examination and the Central Lancashire Councils should revise the CLLP to account for the area's full housing need. The Spring 2024 LDS confirmed the CLLP would be submitted for Examination in Public by June 30th 2025, despite the Regulation 19 consultation only concluding on the 14th April 2025. Gladman question the ability for representations to be thoroughly reviewed within this tight timeframe and for, any modifications to be considered or for any outstanding/additional evidence to be finalised.	councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). The Councils confirm that the representations to the consultation have been thoroughly reviewed, and the evidence base is comprehensive.		

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A26.17	Rep'r	Miss Georgina Cox	Policy	Contents / General Plan	Consistent with Section 19 of the 2004 Planning and Compulsory Purchase Act, Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process completed at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives. The CLLP is supported by an Integrated Impact Assessment (IIA). It should be clear from the results of the IIA why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the local plan decision-making and scoring should be robust, justified and transparent. Gladman's primary concern with the IIA, relates to the assessment of housing quantum options. Of the varying scenarios tested, the highest figure tested is 1,275 dwellings per annum (dpa), or 76% of Housing Need (calculated through the Government's Standard Method). The figure tested does not meet the transitional arrangements as set out in the December 2024 NPPF.	Chapter 4 of the IA (CD05) contains an appraisal of three housing quantum options. The highest of these is Option 3, which would deliver between 1,237 and 1,275 dwellings per annum. Due to the high-level nature of the appraisal of these options, increasing the figure from 1,275 to 1,314 dwellings per annum would not result in any changes to the effects already recorded. The two figures are very similar and there are no exact quantified thresholds at which point effects become significant, which could be breached by the small uplift.	No	Yes
	Org.	Gladman Developments	Site					
	Agent							

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					The IIA provides no justification for the increase of 77 dpa, other than to meet the transitional arrangements and does not explain why the arguments for adopting a higher housing requirement figure are not supported.			
A31.01	Rep'r Org. Agent	Mrs Emily Armstrong F1 Real Estate Management Mr John Francis	Policy Site	Contents / General Plan	Concerns that CLLP does not satisfy regulations nor NPPF / PPG – the plan relies on the advice and guidance on the preparation of development plans set out in the NPPF 2023, but its policies relate to NPPF 2024. Regulation 18 was intended to be carried out in two stages – Part one and Part two; and whilst part one was consulted on in 2023, part two has been 'skipped' with the CLAs progressing to R19 Publication. This approach has 'managed out' appropriate consideration of employment land requirements, and for the representor to present the case for a site to deliver a major logistics facility to serve Chorley. The plan may not be legally compliant to procedural requirements and is unsound.	The CLAs consider that the CLLP has been prepared in accordance with legislation, national policy (NPPF) and associated guidance.	No	Yes
A37.3	Rep'r Org. Agent	Mr Andrew Dewhurst Maple Grove Developments Ltd Mr Justin Cove	Policy Site		A Transport Study was not completed before the Reg 19 consultation commenced. Consequently, it does not meet the legal requirements set out in The Town and Country Planning (Local Planning) (England) Regulations 2012.	There is no legal requirement to prepare a Transport Study. NPPG Paragraph: 034 Reference ID: 61-	No	Yes

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				034-20190315 advises that there is considerable flexibility open to local planning authorities in how they carry out the initial stages of local plan production. The only documents prescribed within the Town and Country Planning (Local Planning) (England) Regulations 2012 are set out within Regulation 22 (1) (a)-(d). Any additional documents are prepared at the discretion of the councils, enabled by para (e). The Representor's argument therefore relates to 'soundness', rather than legal compliance. Sufficient transport evidence was available to inform the CLLP's submission draft. Stage 0 of the Transport Study was completed in March 2024 (IT06a). Broadly, this set out baseline data, which was available for the councils to consider when drafting the CLLP's allocations and policies. Comments were also received Lancashire County Council (LCC) Highways team. This information is summarised within the Plan's SHELAA, particularly the Site Profiles documents HO14c, d and e. The Transport study was commissioned by LCC. As Highway authority, they will be responsible for implementing most of the infrastructure identified within the study. Whilst a completed Transport Study would have been helpful, note		

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						that NPPF para 28 understands that there may be a degree of uncertainty about the plans of infrastructure providers. Consequently, it instructs that Inspectors will need to come to an informed decision based on available information, rather than waiting for a full set of evidence from other authorities.		
A45.15	Rep'r Org. Agent	Taylor Wimpey UK Limited Taylor Wimpey UK Limited Megan Wilson	Policy Site	Contents / General Plan	The Local Plan is being prepared under section 28 of the Planning and Compulsory Purchase Act 2004 ("Act"). Section 28 of the Act requires that anything that is done by one of the local planning authorities in connection with a local plan must be done by each of them. Accordingly, the Local Plan will be required to be adopted by a separate decision of each local authority and will comprise three separate local plans that have been concurrently prepared. A formal joint committee of the local planning authorities has not been established under section 29 of the Act. Therefore, the Local Plan is not a single joint local plan.	The Councils consider the Local Plan to be legally compliant and it has been prepared in accordance with the Regulations.	No	Yes
A64.1	Rep'r Org. Agent	Mr Matthew Banks Private Individual Mr Luke Banks	Policy Site	Contents / General Plan	Failure to Comply with National Planning Policy Framework (NPPF) – Soundness The plan fails to meet the tests of soundness set out in paragraph 35 of the NPPF. Specifically: Justified – The plan is not based on an appropriate strategy, taking into account reasonable alternatives. There has been insufficient evidence provided to show that the	The CLAs consider that the CLLP is sound and is based on a proportionate evidence-base. This evidence has been published alongside the plan and includes assessments of all the allocation sites to document justification for their selection (and conversely, set out why other sites have been discounted).	No	Yes

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					proposed allocations are the most sustainable or appropriate option compared to other reasonable alternatives. Effective – There is inadequate evidence of cross-boundary cooperation or joint working with neighbouring authorities, especially regarding infrastructure provision and cumulative environmental impact. This raises questions about the deliverability of the proposed allocations.	The CLAs have worked with neighbouring authorities and other Duty to Cooperate bodies and have documented this through Statements of Common Ground. The CLAs consider all allocations to be deliverable.		
D03.1	Rep'r Org. Agent	Helen Holland Blackburn with Darwen Borough Council	Policy Site	Contents / General Plan	NPPF states that strategic policies should look ahead over a minimum of 15 years from adoption. Based on our experience elsewhere, we consider that the plan is unlikely to be formally adopted until 2027, so the plan period should be extended until at least 2042.	As stated in the Local Development Scheme, the Plan is scheduled to be submitted in June 2025. Taking into account timescales for Local Plan Examinations produced by PINS, it is expected that the Examination will take place late 2025/early 2026. Adoption is expected by the end of 2026. The plan would therefore cover 15 years from adoption.	No	Yes
D06	Rep'r Org. Agent	Tom McGowan West Lancashire Borough Council	Policy Site	Contents / General Plan	Concerns regarding deficiencies and adequacy & of the evidence base for transport and social infrastructure (schools) and clarity of gypsy and traveller policy (HS13). Gaps in the Duty to Cooperate, insufficient engagement and lack of clarity. Objection to the submission of the plan without matters addressed.	Engagement undertaken with WLBC including the exchange of the emerging strategic evidence base for transport and clarification of the policy HS13. A SOCG with WLBC has been prepared which will include details of all the matters considered and addressed. The Councils have complied with the Duty to Cooperate and the statement plus the compendium of SOCG demonstrate this.	No	Yes

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D09	Rep'r	Lancashire County Combined Authority	Policy	Contents / General Plan	The Lancashire County Combined Authority were formally established in February 2025. They would like the opportunity to make representations on the Local Plan, but as a new body, the timeline for the LCCA's approval processes does not align with the deadline for responding to the consultation. I would be grateful if you could acknowledge the interest of the LCCA and the relevance of the Growth Plan to the Local Plan and allow the LCCA to come forward with representations and to contribute to the Local Plan process as it continues to move forward.	The Councils will continue to do work as part of the duty to cooperate as they become established, when moving forward with the Central Lancashire Local Plan.	No	No
	Org.	Lancashire County Combined Authority	Site					
	Agent							
D12.1	Rep'r	Marcus Hudson	Policy	Contents / General Plan	Lancashire County Council (LCC) has and looks forward to playing a full and active role in evidence gathering and policy formulation, including Duty to Cooperate arrangements. Work remains ongoing to support the plan in relation to school place planning, transport and travel and strategic growth an 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.	Comments in respect of the DtC are welcomed, and the CLAs and LCC have produced a joint SOCG. The comments in respect of specific matters are addressed through subsequent representations made by LCC.	No	No
	Org.	Lancashire County Council	Site					
	Agent							

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Chapter 2: Area Profile				Count of Representations against this policy/section:		5
A31.02	Rep'r Mrs Emily Armstrong Org. F1 Real Estate Management Agent Mr John Francis	Policy Chapter 2: Area Profile Site	Doesn't 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. Concerned if employment sites at Preston West and Cuerden don't 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. The representor considers there is a need for a logistics facility along the M65 in Chorley Borough.	With regard to Cuerden, please see response to representation A31.15. The CLLP identifies the employment land requirements for Central Lancashire and apportions this by Preston, Chorley and South Ribble. The CLLP also identifies and allocates sites that are deemed appropriate to deliver this growth. The Council's evidence base explains how employment requirements have been calculated and apportioned, and how proposed development sites have been identified, assessed and allocated. The Plan allocates sufficient land for employment growth. Regarding the c.63.3ha site area for employment use of the Preston West site (Policy SS5, Site Ref: SS5), the Council is currently exploring with the landowners the correct mix of employment and housing for this allocation. The 50% split was indicative whilst agreements to bring the site forward were put in place, the council is working in more detail with the site promoters as part of wider master planning to agree the final split on this site,No change is required to this policy.	No	Yes
A31.03	Rep'r Mrs Emily Armstrong Org. F1 Real Estate Management	Policy Chapter 2: Area Profile Site	The representor is in support of any initiatives across the Central Lancashire Authorities that are designed to assist and deliver social values and will	Support noted.	No	Yes

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	Agent	Mr John Francis			continue to do so through its developments.			
D02.01	Rep'r	Emily Hrycan	Policy	Chapter 2: Area Profile	Historic England supports this section. We welcome 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.	Noted	No	No
	Org.	Historic England	Site					
	Agent							
D02.02	Rep'r	Emily Hrycan	Policy	Chapter 2: Area Profile	Historic England supports this section.	Noted	No	No
	Org.	Historic England	Site					
	Agent							
D02.03	Rep'r	Emily Hrycan	Policy	Chapter 2: Area Profile	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. The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Historic England acknowledges that 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.	Comments noted. As the Historic Environment is considered within the NPPF, to reduce duplication within the local policies the Historic Environment and its protection has its own policy and is also referenced in several other policies and/or the narratives, chapters and strategic objectives throughout the Local Plan.	No	No
	Org.	Historic England	Site					
	Agent							

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			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. Therefore, within this part of the Plan, Historic England 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.			

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Spatial Vision						Count of Representations against this policy/section:		16
A05.2	Rep'r	Mr. Jonathan Stoker	Policy	Spatial Vision	Stokers support this vision and welcome the particular emphasis on encouraging investment and delivering new employment opportunities to strengthen economic prosperity. The vision as set out in the Plan is considered to be positive and to meet the tests of soundness as set out in the National Planning Policy Framework (NPPF) paragraph 36.	Support is welcomed.	No	No
	Org.	Stokers Ltd	Site					
	Agent	Ms. Amy Longmore						
A18.4	Rep'r	Mr Terry Cooper	Policy	Spatial Vision	We are generally supportive of the proposed Spatial Vision for Central Lancashire for the plan period. The vision opens with the ambitions for the economy in 2041 and focuses on economic growth and other aspects of development e.g. climate change, inequality and infrastructure. Homes are only mentioned once in the spatial vision despite high quality homes being essential to economic growth and achieving sustainable development. The vision should clearly recognise the importance of planning for new homes to support economic growth, existing shops, services and communities. Well planned, high quality, residential development will also be able to support other aspects of the Vision.	Support in principle noted. The purpose of the Spatial Vision is to set very broad ambitions, which the policies/allocations of plan seek to realise. See responses to comments made against Policy HS1 and EC1 regarding Housing and Employment requirements respectively.	No	Yes
	Org.	Private Individual	Site					
	Agent	Soulla Rose						

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A24.20	Rep'r	Mrs Joanne Harding	Policy	Spatial Vision	The Vision suggests that in 2041 and beyond Central Lancashire will have a wide range of high quality sustainable new housing and supporting infrastructure which meets the needs of our diverse communities, delivering vibrant and distinct places. The HBF generally supports this element of the vision and considers that meeting the current and future housing needs should be a key part of the vision for the Plan.	This support is welcomed.	No	No
	Org.	Home Builders Federation	Site					
	Agent							
A24.21	Rep'r	Mrs Joanne Harding	Policy	Spatial Vision	Objective 3: Sustainable Communities looks to create healthy, vibrant, safe and sustainable communities with a diverse range of housing to meet future needs, providing a scale and mix of housing types and sizes and variety of tenure in a range of locations to meet economic aspirations and local housing needs. The HBF generally supports Objective 3 and considers that meeting the current and future housing needs should be a key objective for the Plan.	The support is welcomed.	No	No
	Org.	Home Builders Federation	Site					
	Agent							
A26.1	Rep'r	Miss Georgina Cox	Policy	Spatial Vision	Support the Local Plan's vision in principle, but it should recognise Local Housing Need (LHN) and economic growth aspirations.	Support in principle noted. The purpose of the Spatial Vision however is to set very broad ambitions, which the policies/allocations of plan seek to realise. See responses to comments made against Policy HS1 and EC1 regarding Housing and Employment requirements respectively.	No	Yes
	Org.	Gladman Developments	Site					
	Agent							

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A31.04	Rep'r Org. Agent	Mrs Emily Armstrong F1 Real Estate Management Mr John Francis	Policy Site	Spatial Vision	The below text should be added to increase the emphasis on economic development: Growth and regeneration of our city and town centres and delivery of new employment opportunities and the encouragement and instigation of new economic development initiatives will continue to strengthen economic prosperity, making Central Lancashire a key economic centre for the Northwest.	The Representor's proposed text does not add value. The sentence "delivery of new employment opportunities" already covers this.	No	Yes
A44.3	Rep'r Org. Agent	Mr Jack Pikington Seddon Homes Mr Josh Hellawell	Policy Site	Spatial Vision	The Plan lacks a strong, consistent link to the corresponding need for housing growth. The proposed allocations fall short of meeting the full housing requirement.	The purpose of the Spatial Vision however is to set very broad ambitions, which the policies/allocations of the Plan seek to realise. See responses to comments made against Policy HS1 and EC1 regarding Housing and Employment requirements respectively.	No	Yes
A51.2	Rep'r Org. Agent	Mr Eric Derbyshire Private Individual Mr Daniel Hughes	Policy Site	Spatial Vision	The spatial vision is not supported by the land use allocations proposed, either in terms of the quantum of development to be delivered or the location of allocations. The Plan needs to be able to demonstrate that it has sufficient land use allocated to meet the housing requirement. If the sites are not deliverable, loss of even a modest number of sites would mean delivery would be likely to fall below 80% of local housing need. Some sites are constrained by access and other issues which may prevent development. Additional land use allocations are therefore required. The Plan supports economic growth and	The purpose of the Spatial Vision is to set very broad ambitions, which the policies/allocations of plan seek to realise. The Councils are satisfied that sufficient land is allocated for housing and employment growth. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in	No	Yes

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			employment, particularly in relation to town centres, strategic employment sites, and investment in infrastructure. However, this is not always clearly linked to the need for corresponding housing growth. The economic projections published as part of the evidence base for the plan indicate a much higher level of housing should be planned for, particularly when you factor in the National Cyber Force HQ development. The Plan promotes "balanced growth," but this concept appears to be used in a way that constrains housing delivery rather than fully addressing demand. It prioritises development in existing urban areas but does not propose any significant new allocations outside these locations. This is particularly concerning in the context of Chorley, which does not provide any strategic allocation, does not seek to allocate sites in its smaller sustainable settlements, and is currently planning for a much-reduced number of dwellings by comparison with the number identified in the local housing need for the authority. The lack of a full Green Belt review and the failure to allocate enough new housing sites suggest that growth is being constrained rather than maximised. Little attention has been paid to smaller settlements which often have a variety of services of facilities within them, where suitable allocations would allow future residents to access facilities and services generally on foot, in a more sustainable	Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The Plan allocates housing sites in lower tier settlements.		

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					manner than some of the larger strategic sites the authorities are relying upon. The representor feels the spatial strategy is insufficient to deliver sustainable growth.			
A52.2	Rep'r Org. Agent	Mr Gerald Gornall Private Individual Mr Daniel Hughes	Policy Site	Spatial Vision	The vision is not supported by the quantum land use allocations.	The purpose of the Spatial Vision however is to set very broad ambitions, which the policies/allocations of the Plan seek to realise. See responses to comments made against Policy HS1 and EC1 regarding Housing and Employment requirements respectively.	No	Yes
A53.2	Rep'r Org. Agent	Northern Trust Northern Trust Mr Daniel Hughes	Policy Site	Spatial Vision	The spatial vision is not supported by the land use allocations proposed, either in terms of the quantum of development to be delivered or the location of allocations. The Plan needs to be able to demonstrate that it has sufficient land use allocated to meet the housing requirement. If the sites are not deliverable, loss of even a modest number of sites would mean delivery would be likely to fall below 80% of local housing need. Some sites are constrained by access and other issues which may prevent development. Additional land use allocations are therefore required. The Plan supports economic growth and employment, particularly in relation to town centres, strategic employment sites, and investment in infrastructure. However, this is not always clearly linked to the need for corresponding housing growth. The economic projections	The purpose of the Spatial Vision is to set very broad ambitions, which the policies/allocations of plan seek to realise. The Councils are satisfied that sufficient land is allocated for housing and employment growth. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable	No	Yes

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			published as part of the evidence base for the plan indicate a much higher level of housing should be planned for, particularly when you factor in the National Cyber Force HQ development. The Plan promotes "balanced growth," but this concept appears to be used in a way that constrains housing delivery rather than fully addressing demand. It prioritises development in existing urban areas but does not propose any significant new allocations outside these locations. This is particularly concerning in the context of Chorley, which does not provide any strategic allocation, does not seek to allocate sites in its smaller sustainable settlements, and is currently planning for a much-reduced number of dwellings by comparison with the number identified in the local housing need for the authority. The lack of a full Green Belt review and the failure to allocate enough new housing sites suggest that growth is being constrained rather than maximised. Little attention has been paid to smaller settlements which often have a variety of services of facilities within them, where suitable allocations would allow future residents to access facilities and services generally on foot, in a more sustainable manner than some of the larger strategic sites the authorities are relying upon. The representor feels the spatial strategy is insufficient to deliver sustainable growth.	locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The Plan allocates housing sites in lower tier settlements.		

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A54.2	Rep'r	Northern Trust	Policy	Spatial Vision	The vision is not supported by the land use allocations which are contained within the Plan, either in terms of quantum of development which will be delivered or the spatial location of the proposed allocations. The plan must go further in addressing the region's housing shortfall, ensuring that policies actively promote housing delivery rather than restrict it. This is particularly relevant given that the authorities are seeking to take advantage of the transitional provisions provided at Annex 1 Paragraph 234(a) of the Framework and so do not propose to meet the full local housing needs and seeks examination of the plan against the requirements of the previous Framework. It is acknowledged that under these provisions, the housing requirement must be no less than 80% of local housing need. The plan indicates a housing requirement which meets these provisions. The plan needs to be able to demonstrate that it then makes sufficient land use allocations to ensure that these requirements are achieved. Indeed, when the housing requirement is below the actual need, it is even more crucial that the proposed land use allocations included in the draft plan have been fully assessed for deliverability. The loss of	The Councils are satisfied that sufficient land is allocated for housing and employment growth. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The Councils consider the spatial strategy to be clear and effective.	No	Yes
	Org.	Northern Trust	Site					
	Agent	Mr Daniel Hughes						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			even a modest number of sites would mean that actual delivery would likely fall well below 80% of local housing need and thus further compound the lack of supply of new homes. The representor is aware that some of the sites proposed for allocation are constrained by access and other technical / ownership issues which will likely prevent development. Planning for the bare minimum is neither in the best interests of Central Lancashire, nor does it align with the NPPF which seeks to boost the supply of housing. Therefore, additional land use allocations, particularly for new housing, are required to ensure the plan remains sound and can ensure delivery of at least 80% of the local housing need is achieved in housing within the Local Plan area. The Plan supports economic growth and employment, particularly in relation to town centres, strategic employment sites, and investment in infrastructure. However, this is not always clearly linked to the need for corresponding housing growth. The economic projections published as part of the evidence base for the plan indicate a much higher level of housing should be planned for, particularly when you factor in the National Cyber Force HQ development.			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					The representor feels the spatial strategy is insufficient to deliver sustainable growth.			
A60.1	Rep'r Org. Agent	Ms Ashleigh Genco Story Homes Mr Dan Mitchell	Policy Site	Spatial Vision	Whilst we support the aspirational tone set out within the stated vision and associated objectives, these aspirations are not matched by the policies.	Support in principle noted. The purpose of the Spatial Vision however is to set very broad ambitions, which the policies/allocations of the Plan seek to realise. See responses to comments made against Policy HS1 and EC1 regarding Housing and Employment requirements respectively.	No	Yes
A63.14	Rep'r Org. Agent	PWA Planning PWA Planning Mr Paul Walton	Policy Site	Spatial Vision	The spatial vision is not supported by the land use allocations proposed, either in terms of the quantum of development to be delivered or the location of allocations. The Plan needs to be able to demonstrate that it has sufficient land use allocated to meet the housing requirement. If the sites are not deliverable, loss of even a modest number of sites would mean delivery would be likely to fall below 80% of local housing need. Some sites are constrained by access and other issues which may prevent development. Additional land use allocations are therefore required. The Plan supports economic growth and employment, particularly in relation to town centres, strategic employment sites, and investment in infrastructure. However, this is not always clearly linked to the need for corresponding housing	The purpose of the Spatial Vision is to set very broad ambitions, which the policies/allocations of plan seek to realise. The Councils are satisfied that sufficient land is allocated for housing and employment growth. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			growth. The economic projections published as part of the evidence base for the plan indicate a much higher level of housing should be planned for, particularly when you factor in the National Cyber Force HQ development. The Plan promotes "balanced growth," but this concept appears to be used in a way that constrains housing delivery rather than fully addressing demand. It prioritises development in existing urban areas but does not propose any significant new allocations outside these locations. This is particularly concerning in the context of Chorley, which does not provide any strategic allocation, does not seek to allocate sites in its smaller sustainable settlements, and is currently planning for a much-reduced number of dwellings by comparison with the number identified in the local housing need for the authority. The lack of a full Green Belt review and the failure to allocate enough new housing sites suggest that growth is being constrained rather than maximised. Little attention has been paid to smaller settlements which often have a variety of services of facilities within them, where suitable allocations would allow future residents to access facilities and services generally on foot, in a more sustainable manner than some of the larger strategic sites the authorities are relying upon.	locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The Plan allocates sites housing sites in lower tier settlements.		

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D02.04	Rep'r Org. Agent	Emily Hrycan Historic England	Policy Site	Spatial Vision	The following modification is requested: Our heritage assets historic and natural environment will be conserved and enhanced our natural environment will be protected and enhanced for its intrinsic value whilst providing opportunities for enjoyment, recreation and leisure. The NPPF necessitates that the historic environment should be both conserved and enhanced.	The Spatial Vision is a broad statement. It is not necessary to load it with technical terminology covered by other policies.	No	No
D03.2	Rep'r Org. Agent	Helen Holland Blackburn with Darwen Borough Council	Policy Site	Spatial Vision	The Spatial Vision, Strategic Objectives and the Spatial Strategy described in Policy SS1 are not ambitious enough. 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.	The Representation lacks its own evidence/detail to justify this position. For example, part of the Representor's argument hangs heavily upon a job growth estimate by Oxford Economics, but the source of this work is not cited. The council's Housing Study Update (2024) (HO9) is informed exclusively by forecasts from Cambridge Econometrics. Additional arguments are made that the Plan does not support the aims of the Blackburn Growth Axis (BGA), linking Blackburn Town Centre to Samlesbury. The Blackburn with Darwen Local Plan (2024) (BDLP): Core Policy 2 (CP2): The Spatial Approach contains brief references to this concept. Details regarding the BGA within the council's Statement of Compliance with the Duty to Cooperate (Nov 2022) are however scant, suggesting the concept was not discussed at length with South Ribble Council. Within MIQ document EL4.002 – Matter 2: Vision, Objectives, Strategy &	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				Viability from the examination of the BDLP, the council advised that further details of the BGA would be published in early 2023. No obvious progress has been made. The Representor's associated argument is that the Plan is inconsistent with the draft Lancashire Growth Plan (LGP) prepared by the newly formed (March 2025) Lancashire Combined Authority (CA). The draft LGP offers very little further insight into the BGA however. Note that the councils have responded to the LGP consultation, stating concerns regarding its spatial strategy. The draft LGP is a document too premature to be relied upon to justify that exceptional circumstances exist for Greenbelt release. See responses to Representation refs: D3.5 and D3.6 regarding housing and employment requirements.		
D16.01	Rep'r Mrs Lindsay Alder Org. National Highways Agent	Policy Spatial Vision Site	The Local Plan's ambitions adhere and align to the DfT Circular 01/2022. Cross-boundary impact with neighbouring authorities regarding site allocations should be considered. ar 01/2022.	Adherence to DfT Circular 01/2022 is noted. Cross boundary impacts with neighbours are considered through the Duty to Co-operate process.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Strategic Objectives						Count of Representations against this policy/section:		15
A18.5	Rep'r	Mr Terry Cooper	Policy	Strategic Objectives	We support Objective 3 seeking to provide a scale and mix of housing types and sizes in a range of locations to deliver economic growth aspirations and local housing needs. However, our concern is that this is then not followed through within Policy HS1 which establishes the housing requirement for Chorley as being 334 dwellings per annum (dpa). The CLLP Strategic Objective to meet 'local housing needs' is therefore not achieved by virtue of the strategy that has been adopted in respect of housing delivery under Policy HS1.	The Councils consider the Plan's objectives to be sound.	No	Yes
	Org.	Private Individual	Site					
	Agent	Soulla Rose						
A31.05	Rep'r	Mrs Emily Armstrong	Policy	Strategic Objectives	The Representor supports Strategic Objective 4 – Economic Prosperity in principle, but proposes the below modification: To provide a range of employment and economic growth opportunities in sustainable locations at the right time and at the right locations to meet market needs and demand for all types of employment developments.	The support in principle is welcome. The proposed text does not however add value. It essentially describes the 'sustainable development', which is at the heart of the Plan. The proposed text is also broadly covered by the preceding sentence.	No	Yes
	Org.	F1 Real Estate Management	Site					
	Agent	Mr John Francis						
A39.2	Rep'r	Castle Green Homes	Policy	Strategic Objectives	Objective 3 should state that the Councils seek to surpass Housing Needs, rather than just "meet" them. Objective 9 should not state that the Councils will seek to conserve and enhance un-designated landscapes.	Regarding Objective 3, NPPF para 61 states "The overall aim should be to meet an area's identified housing need…". 'Meeting' housing need is therefore a sound approach. See responses to comments made against Policy HS1 and EC1 regarding Housing	No	Yes
	Org.	Castle Green Homes	Site					
	Agent	Mrs Kerry Walker						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						and Employment requirements respectively The Forest of Bowland National Landscape only covers a small part of the Plan area. The Objectives should not be read in the same way as development policies. Consequently, it is appropriate to aspire to conserve and enhance un-designated landscapes too.		
A44.6	Rep'r Org. Agent	Mr Jack Pikington Seddon Homes Mr Josh Hellawell	Policy Site	Strategic Objectives	PWA recommends that several Strategic Objectives in the Plan be reworded to better align with the need for increased housing delivery and the principles set out in the NPPF 2024. Strategic Objective 3, relating to Sustainable Communities, should be more clearly focused on delivering a sufficient supply of homes and explicitly reference the Government's aim to significantly boost housing supply. The objective should express a clear intention to meet all housing needs as a fundamental part of supporting economic growth and sustainable communities, particularly in light of identified shortfalls such as Chorley's 2.94 year land supply. Similarly, Strategic Objective 4 on Economic Prosperity should be revised to emphasise the intrinsic link between economic success and adequate housing provision. PWA argues that employment growth must be matched by a diverse and sufficient housing supply in order to attract and retain skilled workers, reduce	The Councils consider that the strategic objectives are sound and do not require amendment.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					commuting pressures, and ensure long-term economic sustainability. Housing and economic objectives should be pursued in tandem, reflecting evidence in the Housing Need Statement which confirms the requirement for each authority to meet its own housing need. Strategic Objective 9 concerning the Natural Environment should be reworded to ensure that the need to conserve and enhance landscapes and biodiversity is properly balanced with the need to deliver new development. While protecting the environment is important, it should not be seen as being in conflict with sustainable growth.			
A51.3	Rep'r Org. Agent	Mr Eric Derbyshire Private Individual Mr Daniel Hughes	Policy Site	Strategic Objectives	Strategic Objective 3 'Sustainable Communities' should be reworded to ensure that the key focus is around ensuring that the policies of the plan help to deliver a sufficient supply of homes and to support the Government's objective of significantly boosting the supply of homes (NPPF 2024 Para 61). The objective should expressly indicate a desire to boost the supply of new homes, as a clearer indication of the Councils' intentions to support economic growth and ensure adequate homes are available to meet all needs. Strategic Objective 4 on Economic Prosperity should be revised to emphasise the intrinsic link between economic success and adequate housing	The Councils consider the Plan's objectives to be sound. The spatial vision will be delivered by the application of the objectives.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					provision. The representor argues that employment growth must be matched by a diverse and sufficient housing supply.			
A52.3	Rep'r Org. Agent	Mr Gerald Gornall Private Individual Mr Daniel Hughes	Policy Site	Strategic Objectives	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. Objective 4 should be revised to emphasise the intrinsic link between economic success and adequate housing provision.	It is not necessary to emphasise that the Government has a priority to boost housing delivery within Objective 3 and meeting Local Housing Needs (referring to the government's Standard Method) is already referred to. All the Objectives are interrelated to some extent. It is not necessary to emphasise the interrelationship between Objective 3 and 4 within this section of the plan.	No	Yes
A53.3	Rep'r Org. Agent	Northern Trust Northern Trust Mr Daniel Hughes	Policy Site	Strategic Objectives	Strategic Objective 3 'Sustainable Communities' should be reworded to ensure that the key focus is around ensuring that the policies of the plan help to deliver a sufficient supply of homes and to support the Government's objective of significantly boosting the supply of homes (NPPF 2024 Para 61). The objective should expressly indicate a desire to boost the supply of new homes, as a clearer indication of the Councils' intentions to support economic growth and ensure adequate homes are available to meet all needs. Strategic Objective 4 on Economic Prosperity should be revised to emphasise the intrinsic link between economic success and adequate housing	The Councils consider the Plan's objectives to be sound. The spatial vision will be delivered by the application of the objectives.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)			Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					provision. The representor argues that employment growth must be matched by a diverse and sufficient housing supply.			
A54.3	Rep'r Org. Agent	Northern Trust Northern Trust Mr Daniel Hughes	Policy Site	Strategic Objectives	Strategic Objective 3 'Sustainable Communities' should be reworded to ensure that the key focus is around ensuring that the policies of the plan help to deliver a sufficient supply of homes and to support the Government's objective of significantly boosting the supply of homes (NPPF 2024 Para 61). The objective should expressly indicate a desire to boost the supply of new homes, as a clearer indication of the Councils' intentions to support economic growth and ensure adequate homes are available to meet all needs. Strategic Objective 4 on Economic Prosperity should be revised to emphasise the intrinsic link between economic success and adequate housing provision. The representor argues that employment growth must be matched by a diverse and sufficient housing supply.	The Councils consider the Plan's objectives to be sound. The spatial vision will be delivered by the application of the objectives.	No	Yes
A60.2	Rep'r Org. Agent	Ms Ashleigh Genco Story Homes Mr Dan Mitchell	Policy Site	Strategic Objectives	Whilst we support the aspirational tone set out within the stated vision and associated objectives, these aspirations are not matched by the policies.	Support in principle noted. See responses to comments made against Policy HS1 and EC1 regarding Housing and Employment requirements respectively.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A63.09	Rep'r	PWA Planning	Policy	Strategic Objectives	Strategic Objective 3 'Sustainable Communities' should be reworded to ensure that the key focus is around ensuring that the policies of the plan help to deliver a sufficient supply of homes and to support the Government's objective of significantly boosting the supply of homes (NPPF 2024 Para 61). The objective should expressly indicate a desire to boost the supply of new homes, as a clearer indication of the Councils' intentions to support economic growth and ensure adequate homes are available to meet all needs. The objective must reflect the urgent need to increase supply in order to meet identified local need and prevent the consequences of under delivery, such as the application of the presumption in favour of sustainable development. Strategic Objective 4 (Economic Prosperity) should be reworded to clearly link economic success to a sufficient housing supply: This revision should ensure that economic growth is not seen in isolation but instead emphasises that economic growth is intrinsically linked to housing provision, ensuring both develop in tandem as key drivers of prosperity. This is particularly pertinent given the growth forecasts anticipated by the economic modelling within the evidence supporting the Draft Plan. Strategic Objective 9 'Natural	The Council is satisfied that the strategic objectives are sound and provide an appropriate framework within which to draft more detailed policy.	No	No
	Org.	PWA Planning	Site					
	Agent	Mr Paul Walton						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Environment' needs to be reworded to ensure that the conservation and enhancement of the natural environment is not seen to be at odds with the need to deliver much needed development. The objective needs to balance the need to deliver new development, which in most cases (most of the greenfield land use allocations) will inevitably involve some landscape impact or loss of greenspace. The key is to ensure that such losses are adequately mitigated and where possible opportunities for biodiversity gains are grasped. Strategic Objective 9 (Natural Environment) should be revised to ensure that Green Belt protection does not hinder necessary development. Green Belt protection should be considered alongside the need for sustainable growth, ensuring that necessary development is not unduly restricted where it can contribute to housing, economic prosperity, and well-planned communities while maintaining environmental quality. This is particularly important given no comprehensive Green Belt review has been undertaken to address the shortfall of housing in Chorley, but also the likely requirement of additional allocations across the authorities.			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A67.1	Rep'r Org. Agent	L&Q L&Q Mr Phil Robinson	Policy Site	Strategic Objectives	Objective 3 should state that the Councils seek to surpass Housing Needs, rather than just "meet" them.	Regarding Objective 3, NPPF para 61 states "The overall aim should be to meet an area's identified housing need…". 'Meeting' housing need is therefore a sound approach. See responses to comments made against Policy HS1 and EC1 regarding Housing and Employment requirements respectively	No	Yes
D02.05	Rep'r Org. Agent	Emily Hrycan Historic England	Policy Site	Strategic Objectives	The objectives are supported.	Support welcomed.	No	No
D10.1	Rep'r Org. Agent	Mrs Claire Lowe University of Lancashire	Policy Site	Strategic Objectives	Support the Plan's vision and objectives, with emphasis on higher education and enhancing Preston City Centre. The university is rebranding and changed the name from University of Central Lancashire (UCLan) to University of Lancashire. Requesting the Local Plan reflects this and all instances which reference the university, be changed to the new name.	Agreed – any reference to the University of Central Lancashire will be changed to University of Lancashire in the Local Plan.	Yes MA02	No
D16.02	Rep'r Org. Agent	Mrs Lindsay Alder National Highways	Policy Site	Strategic Objectives	The Plan's objectives align the Circular 01/2022.	Noted.	No	Yes
D27	Rep'r Org.	Ms Anna Baybutt Lancashire Constabulary	Policy Site	Strategic Objectives	The inclusion of crime prevention and security as important factors to consider in development is welcomed.	The representation of support is welcomed by the Councils.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent					

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy SS1: Development Patterns						Count of Representations against this policy/section:		17
A03	Rep'r	Ms. Linda Smith	Policy	Policy SS1: Development Patterns	Seeks to ensure protection of public rights of way (PROW) and ensure they are a material consideration when determining planning applications. The PNFS expect to be informed	Noted. The impact of any proposals on existing PROWs would be considered at the planning application stage. Lancashire County Council as the Highways Authority would be consulted to provide comments on the impact of any proposals on a PROW as are the Ramblers Association in addition for Preston Council.	No	No
	Org.	Peak and Northern Footpath Society	Site					
	Agent	Not Provided						
A24.1	Rep'r	Mrs Joanne Harding	Policy	Policy SS1: Development Patterns	This policy states that new housing will be focused on the most sustainable locations in Central Lancashire, where development can, amongst other elements, help regenerate our City and Town centres; and make the best use of well-located previously developed land and buildings. The HBF considers that whilst it is appropriate to support and maximise the use of previously developed sites and sites in and around the town centre this needs to be done in the right way and should not prevent the delivery of other sustainable sites or sustainable developments. The Council will need to be able to demonstrate with evidence that this strategy is deliverable and developable over the Plan period, will meet the varied housing needs and will not lead to a shortage of homes being delivered.	Councils do not agree that the plan prevents sustainable sites being developed. The plan identifies land across the plan area, including land released from open Countryside and safeguarded land to meet identified needs. The plan is not solely focussed on previously developed sites and sites in and around the town centres as can be seen by the allocations set out within and this is covered by point 3 of SS1. The range of sites promoted within the plan allow for the housing needs of Central Lancashire's communities to be met.	No	Yes
	Org.	Home Builders Federation	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A25.1	Rep'r	Mr Lee Bootle	Policy	Policy SS1: Development Patterns	Policy SS1 states that new housing, employment and commercial growth will be focussed on the most sustainable locations in Central Lancashire. The purpose of Policy SS1 is to shape and support the achievement of a sustainable pattern of development in Central Lancashire over and beyond the plan period. The Landowner supports focussing new growth on the most sustainable locations in Central Lancashire as set out by Policy SS1, however by failing to plan for the new minimum housing requirement, it is considered Central Lancashire is not supporting delivery of SS1. The plan fails to meet the new requirements for Central Lancashire and particularly underdelivers for Chorley and is therefore not positively prepared.	The Council has prepared the plan in accordance with the NPPF and considered the plan to provide for sufficient land to be developed to meet Central Lancashire's needs.	No	Yes
	Org.	Private Individual	Site					
	Agent	Ms Hope Bleasdale						
A26.2	Rep'r	Miss Georgina Cox	Policy	Policy SS1: Development Patterns	Support focus for new housing to be in the most sustainable locations. Gladmans find wording to parts 3 and 4 of the policy restrictive and does not allow for development around settlements which is considered to restrict their growth. 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.	Note support for growth in sustainable locations. The councils consider the policy provides for development to come forward in the most sustainable locations enabling the plan to deliver the housing required to meet the areas needs.	No	Yes
	Org.	Gladman Developments	Site					
	Agent							
A31.06	Rep'r	Mrs Emily Armstrong	Policy	Policy SS1: Development Patterns	Requested a number of changes to Policy SS1 parts 1-3. Changes mainly relate to reflecting a more relaxed approach to the locations considered suitable for development and to include reference to development within the Grey belt and	The changes proposed are not considered acceptable. The changes would have the effect of weakening the policy and watering down the protection of land in open countryside and Green Belt Areas which would be	No	Yes
	Org.	F1 Real Estate Management	Site					
	Agent	Mr John Francis						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					such development being expected to demonstrate very special circumstances	contrary to other policies in the plan (SS1, EN17 and EN18)		
A38.7	Rep'r Org. Agent	Taylor Wimpey UK Limited Taylor Wimpey UK Limited Ms Alexandra Gavi	Policy Site	Policy SS1: Development Patterns	Taylor Wimpey supports part 3 of this policy in the context of ref. HS2.26 'Land to the east of New Street' and notes the contribution this site will have towards Chorley's 5 Year Housing Land Supply. Facilitating the delivery of small/medium sized sites that are sustainably located is critical in supporting Chorley's increased housing requirement, as well as Chorley's affordable housing needs.	Noted.	No	Yes
A39.3	Rep'r Org. Agent	Castle Green Homes Castle Green Homes Mrs Kerry Walker	Policy Site	Policy SS1: Development Patterns	SS1 expects new housing, employment and commercial growth and associated infrastructure will be focused on the most Sustainable locations in Central Lancashire. This is broadly supported. For the strategy to be positively prepared and therefore sound, it needs to be sufficiently flexible. It is recommended that point 3 is amended to accommodate a scenario where needs are such that other locations need to be considered for development, which comply with other policies in the CLLP. The Council's will need to be able to demonstrate with evidence that this strategy is deliverable and developable over the Plan period, will meet the varied housing needs and will not lead to a shortage of homes being delivered, so some flexibility within the spatial strategy is needed	Noted. Council consider the strategy as proposed is deliverable.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A55.1	Rep'r	Ms Sophie Eaton	Policy	Policy SS1: Development Patterns	The representor refers to comments made in a Preferred Options – Part One submission. The Spatial Strategy is largely carried over from the Central Lancashire Core Strategy, in that it continues to focus development on the delivery of key strategic locations across Preston and South Ribble. Another key element of the proposed spatial strategy is the potential Salmesbury/Cuerdale Growth Option adjacent to the A59. Redrow have concerns about this proposal due to the significant harm it would cause to the Green Belt and the Brockholes Nature Reserve SSSI. In short, the scale of the proposal is unsuitable for its location	The council is not proposing housing development in the Samlesbury/Cuerdale Growth area, as such the councils support this position in regards to development in the Green Belt.	No	Yes
	Org.	Redrow Homes	Site					
	Agent							
A60.3	Rep'r	Ms Ashleigh Genco	Policy	Policy SS1: Development Patterns	The sites allocated in the plan are not in accordance with SS1 and appear to have been selected purely on the basis of sites which have been assessed favourably within the SHELAA. The identified development patterns should be predicated on a robust spatial strategy, which proposes to accommodate local housing needs, in the locations where such need has arisen or is projected to arise due to economic objectives. As such, we object to draft Policy SS1 on the basis that insufficient justification has been provided as to how the development patterns proposed by Policy SS1 have been derived. Attention is drawn to the statement "The	The Council considers the approach taken is justified. We do not agree that the site selection process is flawed and that is does not accord with SS1. The councils have identified sufficient land to meet the identified housing needs of the plan area in accordance with the NPPF transitional arrangements. In respect of employment Land, the councils have identified more land that is required to meet the identified needs and the sites provided allow for continued growth of the Central Lancashire Economy.	No	Yes
	Org.	Story Homes	Site					
	Agent	Mr Dan Mitchell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Green Belt in Central Lancashire will continue to prevent urban sprawl by keeping land permanently open." It is not clear how this has been justified. It is not believed that the CLA's have provided sufficient of robust evidence to justify maintaining the extent of the existing Green Belt. The authorities have failed to address the issue of GB in a transparent manner therefore the plan has not been prepared positively. The site selection process is flawed in suggesting Chorley's need can be met elsewhere in the plan area. We do not believe the councils can demonstrate a 5YHLS. It is essential that the Central Lancashire Authorities are able to robustly demonstrate that the spatial strategy is deliverable and underpinned by a proportionate evidence base which has then informed the allocation of land to meet that strategy. As it stands, the development patterns proposed by Policy SS1 appear to be based on the identification of sites, without due consideration as to whether those sites are in the right locations to address local housing needs, and respond to economic factors, owing to a flawed site selection process. The profile of proposed spatial strategy fails to respond to the Lancashire Combined County Authority's Lancashire Growth Plan 2025 – 2035 (February 2025), which identifies of a need for a new generation of large strategic sites to be planned for to realise its economic growth ambitions and capitalise on planned investment. Given its location at the heart of the arc of			

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					growth in Lancashire, and the concentration of investment in the growth sectors in the cyber and defence sectors within Central Lancashire, this omission represents a significant failure to plan positively and support the needs of the modern economy, as required explicitly by the NPPF (paragraphs 85 and 86). We consider that insufficient justification has been provided to demonstrate that exceptional circumstances no longer exist to justify the lack of Green Belt release. We make the case that the CLLPs revised purported approach to its spatial strategy is contrived around meeting the minimum requirement provided by the NPPF2024 to benefit from the transitional arrangements for Regulation 19 Local Plans. It is not a positively prepared or justified Local Plan.			
A61.1	Rep'r Org. Agent	Mr Rob Haslam Harworth Estates Mr Brian O Connor	Policy Site	Policy SS1: Development Patterns	Harworths strongly support the allocation of sites within the CLLP, particularly SS5. The evidence base including the SHELAA, is clear that there is insufficient brownfield land within the urban area to meet the identified housing and employment needs of the Central Lancashire Boroughs over the upcoming plan period (2023-2041) (as set out in draft Policy HS1) The allocation of sustainable, strategic sites within the CLLP is therefore vital to ensuring that objectively assessed housing and employment needs can be met and brownfield land and windfall development is not solely relied upon.	Noted.	No	Yes

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					The allocation of Preston West in the CLLP will therefore form a vital contribution towards meeting the identified needs of Central Lancashire and Preston through the delivery of a highly sustainable, well connected site adjacent to a Tier 1 settlement.			
A63.13	Rep'r	PWA Planning	Policy	Policy SS1: Development Patterns	PWA feels the spatial strategy does not go far enough in supporting growth and only allocated land to meet 80% of the housing requirement for the area. As it stands there is likely to be a significant under-provision of deliverable sites in Chorley, and a lack of strategic flexibility to meet future demand. PWA feel the Plan does not align with new NPPF which the transitional provisions allow for. SS1 Fails to allocate sufficient land to meet housing needs in full with no substantial new allocations. There is no flexibility to address housing shortages should any site fail to deliver and there is over reliance on a limited number of large sites in Preston and South Ribble. The Spatial Strategy is unbalanced , directing most growth to North West Preston, resulting in an overreliance in this area and missed opportunities for sustainable growth in other towns. It is noted there is safeguarded land in Chorley and South Ribble which could accommodate housing. The NPPF 2024 clarifies that Green Belt	The Council considers the approach taken is justified. We do not agree that the site selection process is flawed and that is does not accord with SS1. The councils have identified sufficient land to meet the identified housing needs of the plan area in accordance with the NPPF transitional arrangements	No	Yes
	Org.	PWA Planning	Site					
	Agent	Mr Paul Walton						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					boundaries can be reviewed where housing needs cannot otherwise be met, it is considered a significant missed opportunity that the draft plan does not undertake a proper Green Belt review, which limits opportunities for sustainable development and fails to explore all reasonable options for meeting housing needs. A true growth strategy would include a comprehensive Green Belt review. The failure to consider Green Belt release is a major flaw in the Plan, as it prevents sustainable development from taking place in locations where demand is highest. This is a major flaw in the plan and would help to ensure a more sustainable pattern of future development and align each authorities housing requirements to their actual needs, rather than being constrained by the limitations of site availability.			
A65.1	Rep'r Org. Agent	Bloor Homes Limited Bloor Homes Limited Mr Harry Russell	Policy Site	Policy SS1: Development Patterns	Bloor considers that Policy SS1 is unsound and will not meet the tests of soundness. Policy SS1 directs development in Central Lancashire to within settlement boundaries (through the development of windfall sites) and on allocated sites. Lichfields consider that relying on the current draft allocations and windfall sites will be insufficient to meet the housing requirement across Central Lancashire. Policy SS1 is a restrictive	The Councils consider the evidence to support a windfall allowance is robust. The Plan allocates sufficient land for housing growth. As the Authorities can meet their need for homes, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			policy focused primarily on not releasing Green Belt, rather than allocating sufficient and suitably located sites to form a sustainable pattern of development. The CLLP makes significant allowances for windfalls in the claimed supply 3,139 windfall allowance (13.3% of supply). The NPPF states that where an allowance is to be made for windfall sites as part of an anticipated supply, there should be "compelling evidence that they will provide a reliable source of supply". There is concern that evidence for Chorley's Windfall is artificially inflated in more recent years due to the Council not being able to demonstrate a 5YHLS and having an out-of-date plan. It is not expected that if the draft plan is adopted delivery of large windfall will continue at that rate. The SHELAA states that new build windfall completions on greenfield land are generally infill development and that it is expected that such development will continue to come forward, and a policy on infill development be included in the CLLP. Draft CLLP Policy EN15 (Areas of Green Belt) does refer to limited infilling in villages or on previously developed land. However, this policy does not provide any further support than that provided by existing national (NPPF Paragraph 154) and local policy (Central Lancashire Core Strategy 2012 Policy 1: Locating Growth).			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			There is also concern what contribution brownfield and conversion sites will continue to play in meeting supply as windfall development. It is also considered the most sites for brownfield development and change of use conversion will already have come forward, therefore any approach relying on supply from this source is flawed. The CLLP includes small site windfall allowances from year 2 of the plan period after adoption (2027/2028). Windfall sites are not planned for and therefore do not already have planning permission. Due to lead in times associated with planning decisions and the time taken for land to become available, it is widely accepted that windfall allowances should not be included until year 3 of the plan period after adoption (i.e., 2028/2029). The representor considers land allocated is insufficient to meet need, does not consider Green Belt sites in sustainable locations as alternative strategy and no compelling evidence in support of windfall. It is recommended that Chorley's windfall allowance is reduced and additional land allocated in Chorley to meet the areas need including contribution from land within the Green Belt to reduce future speculative applications.			

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A67.2	Rep'r	L&Q	Policy	Policy SS1: Development Patterns	SS1 Is broadly supported. For the strategy to be positively prepared and therefore sound, it needs to be sufficiently flexible. It is recommended that point 3 is amended to accommodate a scenario where needs are such that other locations and opportunities need to be considered for development, which comply with other policies in the CLLP. The Councils will need to be able to demonstrate, with evidence, that this strategy is deliverable and developable over the Plan period, will meet the varied housing needs and will not lead to a shortage of homes being delivered, so some flexibility within the spatial strategy is needed.	Note the broad support for the policy. The Councils consider the approach taken is justified and provides sufficient land to meet the identified housing needs of the plan area in accordance with the NPPF transitional arrangements.	No	Yes
	Org.	L&Q	Site					
	Agent	Mr Phil Robinson						
C3.1	Rep'r	The Talbot Estate	Policy	Policy SS1: Development Patterns	SS1 is unsound as it is not consistent with para 124 of NPPF. In accordance with SS1, 2 parcels of land in Chorley should be considered for housing as they are within the settlement boundary.	Policy SS1 conforms with the National Planning Policy Framework (NPPF) and all sites which were submitted to the Council throughout the Local Plan process that are located within the settlements were considered and assessed through the SHELAA. See response to rep C3.2 regarding the omission sites referred to.	No	Yes
	Org.	The Talbot Estate	Site					
	Agent	Mrs Claire Wilkinso						
D02.06	Rep'r	Emily Hrycan	Policy	Policy SS1: Development Patterns	We welcome this policy which positively protects and enhances the historic environment, an important component of the drive to achieve sustainable development in the NPPF.	Noted	No	No
	Org.	Historic England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D16.03	Rep'r Org. Agent	Mrs Lindsay Alder National Highways	Policy Site	Policy SS1: Development Patterns	The Vision of the presented Policy shows an alignment to sustainability and regeneration of existing urban areas, whilst also being inclusive of infill development and support for urban fringes and rural areas. This is stated to be achieved through the use of active modal trips and public transport, aligning to National Highways policy within the Circular 01/2022 to reduce the numbers of new trips on the SRN through sustainable methods. NH note the need to work directly with them in bringing forward the strategic sites to ensure there are no adverse impacts on the SRN and that the presented sustainability of all sites is a central tenet within planning applications and following the delivery of the development proposals.	Noted. Councils intend to continue to work with NH on development of allocated sites proposed within the plan area.	No	Yes
D20.1	Rep'r Org. Agent	Mrs Julie Buttle Whittingham Parish Council	Policy Site	Policy SS1: Development Patterns	Whittingham Parish Council supports Policy SS1 where new development will be focused within settlement boundaries and on allocated sites as this provides clarity regarding where new development should be proposed.	Noted	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy SS2: Settlement Hierarchy						Count of Representations against this policy/section:		21
A18.1	Rep'r	Mr Terry Cooper	Policy	Policy SS2: Settlement Hierarchy	General support of the tiers. View that omitted site (Land at Toy Farm, Euxton) would lie within tier 3 and is also close enough to be considered functionally linked to the main Chorley urban area as a wide range of services and facilities are available within an accessible distance from the site in Chorley.	Noted – response to omitted site will be completed separately.	No	Yes
	Org.	Private Individual	Site					
	Agent	Soulla Rose						
A24.2	Rep'r	Mrs Joanne Harding	Policy	Policy SS2: Settlement Hierarchy	Policy SS2 is not considered to be sound as it is not positively prepared, justified, or consistent with national policy. The HBF would expect the Central Lancashire Councils to 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.	An urban focused approach is reflected in the Settlement Hierarchy, responding to the requirements of Policy SS1. Concentrating most new development on Central Lancashire's urban areas, towns and larger settlements offers a range of opportunities. Paragraph 11 of the NPPF states '... a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects...'	No	Yes
	Org.	Home Builders Federation	Site					
	Agent							
A25.2	Rep'r	Mr Lee Bootle	Policy	Policy SS2: Settlement Hierarchy	The Landowner strongly supports Policy SS2. However, there is a misalignment in the Local Plan's spatial strategy that should be remedied by an uplift to the housing requirement. A more balanced approach towards housing growth is required to ensure that Chorley is able to meet its Local Housing Need as a minimum.	Noted – comments in relation to housing requirement will be addresses through responses to HS1.	No	Yes
	Org.	Private Individual	Site					
	Agent	Ms Hope Bleasdale						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A26.3	Rep'r	Miss Georgina Cox	Policy	Policy SS2: Settlement Hierarchy	Gladman object to the placement of Broughton and Goosnargh in the Settlement Hierarchy, particularly given recent, committed and forthcoming development and infrastructure improvements at these settlements. Broughton - strategically located west of the M6 and north of the M55 and A6, been subject to significant highway connection improvements, wider improvements to its centre and benefits from a secondary school. Policy SS2 should therefore be amended so that Broughton is defined as a Tier 3 Urban Local Service Centre. Goosnargh – CLLP affords a reasonably significant scale of development though draft allocation HS4.1, pending application for a new primary school and new community facilities proposed. Policy SS2 should therefore be amended so that Goosnargh is defined as a Tier 4 Rural Local Service Centres	The growth in Broughton has already been reflected in it moving to Tier 4 from Tier 5 and is now noted as Rural Local Service Centre. The Council is satisfied that Goosnargh remains a Tier 5 settlement. No further changes are considered necessary to the hierarchy.	No	Yes
	Org.	Gladman Developments	Site					
	Agent							
A32.1	Rep'r	Mr Stephen Glenn	Policy	Policy SS2: Settlement Hierarchy	It is unclear why policy SS2 of the Regulation 19 Publication Plan is now treating Tiers 3 and 4 differently. This is further confused by the policy referring to Tier 5 settlements accommodating 'more limited' development, especially as the housing allocations in policies HS2 relating to Chorley propose more housing allocations at the Tier 5 settlements than at Tier 4. SS2 could be amended to remove the reference to	The councils do not consider any further changes are required to the hierarchy as presented.	No	Yes
	Org.	Northern Trust Land Ltd	Site					
	Agent	Mr Alexis De Pol						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					limited development in Tier 4 so that it reflects Tier 3 in terms of permitting development which is of a scale and type appropriate to the settlement size and character, or Eccleston and Croston could be moved into Tier 3.			
A36.1	Rep'r Org. Agent	Mr Neil Lucas Logik Strategic Land Mr Neil Lucas	Policy Site	Policy SS2: Settlement Hierarchy	Logik considers that Policy SS2 should be amended to reflect the potential for strategic development around Cuerdale / Salmesbury within the plan period. Logik's suggested amendments to the policy below: b) Key Service Centres (Tier 2), including the towns of Leyland and Chorley and development in the South Ribble Urban Area will be the secondary focus for development, complementing the role of the Tier 1 Urban Area. Table 1: Settlement Hierarchy should also be modified accordingly to reflect the above, with the text relating to Tier 2 amended to read: "Land within: a) Leyland and the South Ribble Urban Area (Penwortham, Walton-le-Dale, Lostock Hall, Cuerdale, and Bamber Bridge)	The council's do not consider any further changes are required to the hierarchy as presented.	No	Yes
A39.4	Rep'r Org. Agent	Castle Green Homes Castle Green Homes Mrs Kerry Walker	Policy Site	Policy SS2: Settlement Hierarchy	The hierarchy needs to be justified by suitable evidence to demonstrate it is the most appropriate strategy. It needs to demonstrate that it supports a suitable and sustainable spatial distribution of sites and therefore provides an appropriate pattern of development. The evidence will also need to ensure suitable support for sustainable development	Noted. The CLLP is supported by a suite of evidence documents which support the hierarchy as presented.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					within all market areas. The strategic site allocations will need to be suitably justified to deliver the quantum of development expected. These are also locations where there are some viability concerns.			
A45.3	Rep'r	Taylor Wimpey UK Limited	Policy	Policy SS2: Settlement Hierarchy	Further growth should be allocated to the tier 2 and tier 3 settlements to ensure the housing need figure, is delivered and to allow for greater flexibility. Whilst an approach to the appropriate use of brownfield and previously developed land is supported, realistic timeframes have to be considered when projecting completions from such sites. 71% of younger buyers crave more outdoor space and rural locations. Would also like to highlight the benefits of providing family housing, in sustainable locations. There should be sufficient flexibility established within the identified settlement hierarchy to recognise that there are inconsistencies with assessment of the settlement hierarchy on the basis of Green Belt within the Plan area.	The council's do not consider any further changes are required to the hierarchy as presented. Issues regarding site specific omission for locations in the green belt will be dealt with separately.	No	Yes
	Org.	Taylor Wimpey UK Limited	Site					
	Agent	Megan Wilson						
A55.2	Rep'r	Ms Sophie Eaton	Policy	Policy SS2: Settlement Hierarchy	The representor refers to comments made in a Preferred Options – Part One submission. A clear settlement hierarchy is outlined, with five settlement tiers according to the settlement's sustainability and suitability for further growth. The hierarchy is broadly similar to Core Strategy Policy 1, but has been expanded	The Councils note the support for the hierarchy as presented. The Councils do not consider any further changes are required to the hierarchy as presented. Issues regarding site specific omission for locations will be dealt with separately.	No	Yes
	Org.	Redrow Homes	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			to provide five tiers rather than three. This additional distinction is useful in that it provides further clarity on the anticipated distribution of development across the three Authorities. The hierarchy proposed is a fair and accurate reflection of the sustainability of each location. Redrow are concerned that the proposed site allocations do not, in all circumstances, mirror the level of development anticipated to be attributed to each tier. 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. Redrow consider that further allocations should be identified in sustainable locations in Tier 1-3 settlements, to ensure that the growth of each settlement is more in-keeping with its sustainability credentials.			
A60.4	Rep'r Ms Ashleigh Genco Org. Story Homes Agent Mr Dan Mitchell	Policy Policy SS2: Settlement Hierarchy Site	We are concerned that the proposed settlement hierarchy set out at Policy SS2 has been driven by a supply-led approach which considers the availability of sites, rather than an evidence based approach strategy for sustainable growth which attempts to accommodate growth in the locations where such need is arising. ("SHELAA") states that: "Allocations were decided taking into account the findings of the Stage 2 assessment of sites and the proposed spatial strategy and	Noted. The CLLP is supported by a suite of evidence documents which support the hierarchy as presented.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					settlement hierarchy." [Our emphasis]. The Central Lancashire Authorities have not provided any robust evidence to demonstrate how the spatial strategy or settlement hierarchy has guided the allocation of sites. Our review of the CLLP evidence base suggests that the entire site selection process for the CLLP is undertaken within the SHELAA itself.			
A61.2	Rep'r	Mr Rob Haslam	Policy	Policy SS2: Settlement Hierarchy	Harworth supports Policy SS2 and considers that the policy is sound as currently drafted. However, the Central Lancashire authorities should not be overly reliant on the delivery of development on brownfield land through regeneration schemes, including in Preston.	Noted. In line with NPPF paragraph 110, 115 and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment and housing growth across all settlements allowing for both brownfield and green field development to come forward.	No	Yes
	Org.	Harworth Estates	Site					
	Agent	Mr Brian O Connor						
A62.2	Rep'r	Lilford (2005) Ltd	Policy	Policy SS2: Settlement Hierarchy	Lilford (2005) Ltd owns and is promoting site HS2.6. The need for a proportionate level of new development within smaller settlements, is acknowledged within the Draft Plan. The Lilford Estates supports this acknowledgement.	Noted.	No	Yes
	Org.	Lilford (2005) Ltd	Site					
	Agent	Mr Andrew Bickerd						
A63.6	Rep'r	PWA Planning	Policy	Policy SS2: Settlement Hierarchy	Policy SS2 places too much reliance on urban areas like North West Preston while failing to consider sustainable Green Belt releases that could better distribute growth. This omission is at odds with Chorley's inability to meet its own local housing need requirements. It	The Plan allocates sufficient land for employment and housing growth across all settlements allowing for both brownfield and green field development to come forward.	No	Yes
	Org.	PWA Planning	Site					
	Agent	Mr Paul Walton						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					is recommended that Tier 2 is merged into Tier 1 to reflect the significant urban function of these settlements. The differentiation between Tier 4 and Tier 5 remains unclear. Recommendations •Housing allocations are increased •Conduct a full Green Belt review •Distribute growth more evenly across all settlements •Reassess Policies SS1 and SS2 to ensure they facilitate, rather than constrain, housing delivery in line with national objectives.			
A65.2	Rep'r	Bloor Homes Limited	Policy	Policy SS2: Settlement Hierarchy	The CLLP is overly reliant on a few key strategic sites in Preston to meet development needs. Coupled with the significant reliance on windfall sites. Development should be directed to other sustainable settlements across the plan area to ensure Central Lancashire's short-medium term needs are met. Directing the majority of development to Preston and relying on four strategic sites to deliver a large proportion of housing supply is not an appropriate strategy particularly as there are no strategic sites being proposed in the borough of Chorley despite market and affordable housing need, in addition to existing housing market stress. Green Belt boundaries should be reviewed, and additional land should be allocated for residential development in sustainable locations surrounding Key Service Centres and Urban Local Service Centres	The Plan allocates sufficient land for employment and housing growth across all settlements allowing for both brownfield and green field development to come forward.	No	Yes
	Org.	Bloor Homes Limited	Site					
	Agent	Mr Harry Russell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			particularly in Chorley.			
A67.3	Rep'r L&Q Org. L&Q Agent Mr Phil Robinson	Policy Policy SS2: Settlement Hierarchy Site	The hierarchy is noted and generally supported by L&Q, but this needs to be justified by suitable evidence to demonstrate it is the most appropriate strategy. L&Q would just note that the strategic site allocations will need to be suitably justified to deliver the quantum of development expected especially as they are in locations where there are viability concerns.	Noted. The CLLP is supported by a suite of evidence documents including a Viability Report which support the hierarchy as presented.	No	Yes
B65.1	Rep'r Messrs Rankin, Patel and Briggs Org. Private Individual Agent	Policy Policy SS2: Settlement Hierarchy Site	Insufficient weight is given to Tier 4 settlements and the role that new development can play in supporting local services and facilities which are often under strain in the Rural Local Service Centres. Policy SS2 should recognise that Tier 4 settlements should allow some expansion and new development to main their existing services and facilities.	Rural Local Service Centres (Tier 4) will accommodate limited new development, appropriate to the settlement size, to help meet local housing and employment needs and help sustain local services and facilities.	No	Yes
D02.07	Rep'r Emily Hrycan Org. Historic England Agent	Policy Policy SS2: Settlement Hierarchy Site	Paragraph 3.15 (bullet 6) - Rather than 'maintain and enhance' in reference to the historic environment it should be 'conserve and enhance' in line with the NPPF. SS2 to be amended to read: "Maintain Conserve and enhance the natural and historic environment…."	Changes proposed are agreed.	Yes MA04	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D03.3	Rep'r	Helen Holland	Policy	Policy SS2: Settlement Hierarchy	The settlement hierarchy should incorporate flexibility to allow economic and associated residential growth outside existing settlement boundaries where it is demonstrably sustainable and in accordance with the development patterns identified by Policy SS1. The village of Mellor Brook and the economic cluster comprising the Salmesbury Enterprise Zone and the BAE Systems site, these elements constitute a particular form of sustainable settlement which warrants special consideration within a revised hierarchy.	The use of a Settlement Hierarchy in the Local Plan ensures that development is distributed to and takes place in the most sustainable and appropriate places.	No	Yes
	Org.	Blackburn with Darwen Borough Council	Site					
	Agent							
D16.04	Rep'r	Mrs Lindsay Alder	Policy	Policy SS2: Settlement Hierarchy	NH note that SS2 is a suitable approach to reducing the expansion of outlying areas whilst encouraging sustainable development. The overarching theme of this approach is the encourage sustainable travel and sustainable neighbourhoods and revitalised areas, linking directly to other Policies and themes throughout this document, which aligns with National Highways approach and policy.	Noted.	No	Yes
	Org.	National Highways	Site					
	Agent							
D20.2	Rep'r	Mrs Julie Buttle	Policy	Policy SS2: Settlement Hierarchy	Whittingham Parish Council strongly supports the area of separation between Whittingham and Longridge but believes it should be extended to include sites HS4.13 and HS4.14.	The wording is in line with the defined settlements in the Rural area as presented on the Policies Map	No	Yes
	Org.	Whittingham Parish Council	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D26.01	Rep'r	Ms Rachel Whitaker	Policy	Policy SS2: Settlement Hierarchy	In order to reflect the mitigation and recommendations made within the HRA, we advise this section clearly demonstrates the relationship between policies EN7, HC5, EN5, EN10, EN11 and EN12.	Noted. SS2 relates solely to the hierarchy. Policy SS1 sets out the spatial strategy for growth and the spatial components that direct this to the most sustainable locations, It is considered that this section reflects the points raised above.	No	No
	Org.	Natural England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy SS3: Strategic Site Allocation - NW Preston / Bartle				Count of Representations against this policy/section:		9
A45.4	Rep'r: Taylor Wimpey UK Limited Org.: Taylor Wimpey UK Limited Agent: Megan Wilson	Policy: Policy SS3: Strategic Site Allocation - NW Preston / Bartle Site: North West Preston	North West Preston/Bartle (SS3) is required to be brought forward having regard to the adjacent site and there remain considerable complexities associated with a need to accord with existing masterplan. It is essential that delivery of the site or indeed any application(s) does not prejudice the ability of the adjacent site to come forward in line with the permitted scheme. These issues are further complicated by the fact that there are multiple land owners involved in the scheme and land assembly including matters of equalisation, are likely to be significantly problematic when it comes to delivery. There is insufficient evidence provided to confirm that the site is achievable and deliverable as such. The Housing Land Supply report prepared by Stantec reduces the contribution that the site can make towards delivery in the plan period to 1,000 dwellings. The Stantec report states: Preston contends that development will start to come forward at the Site in 2029. In our 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.	The council have based delivery in this location on past delivery rates and information provided by the developers on their intended programme received as part of the Site Promoter Survey.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A47	Rep'r	Reaper Limited and Hulton Land Ltd	Policy	Policy SS3: Strategic Site Allocation - NW Preston / Bartle	R&HL support policy SS3 and its requirement to deliver a range of centres in line with the North West Preston Masterplan (NWPM). R&HL have an interest in land to the immediate east of the Eastway Retail Hub. It forms part of the land identified for a mixed use local centre in the NWPM. R&HL intend to bring this forward as an extension to the Eastway Retail Hub. An application is due to be submitted during 2025.	Support for SS3 noted.	No	Yes
	Org.	Reaper Limited and Hulton Land Ltd	Site	North West Preston				
	Agent	Mr Matthew Symo						
D01.2	Rep'r	Eddie Graves	Policy	Policy SS3: Strategic Site Allocation - NW Preston / Bartle	The CLLP includes strategic development sites SS3 and SS5 close to the boundary with Fylde. The sites represent a very significant urban extension; however, Fylde Council has some concerns about how the development will proceed and some potential impacts of the developments. In the case of site SS3, although reference is made to the need for an infrastructure delivery schedule linked to the phases of development on the site, there are no specifications as to what those phases should consist of, nor to any limits to what development could take place prior to the provision of key infrastructure.	Council has discussed the DtC response with Fylde and has prepared a SoCG which addresses and resolves each of the concerns raised.	No	Yes
	Org.	Fylde Council	Site	NW Preston / Bartle				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D05.1	Rep'r	Angela Brookes	Policy	Policy SS3: Strategic Site Allocation - NW Preston / Bartle	A National Grid Asset interacts with this allocation. Addition to Key Development Considerations table: Infrastructure: The development will include a strategy for responding to the National Grid Overhead Cable Route present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.	Change not considered necessary and the issue can be picked up through the detailed masterplanning stage.	No	No
	Org.	National Grid Electricity Transmission	Site	North West Preston				
	Agent							
D13.7	Rep'r	Mr Geoff Lavery	Policy	Policy SS3: Strategic Site Allocation - NW Preston / Bartle	Representation D13 considers the plan to be legally compliant, sound and complies with the duty to co-operate. Specific comments on Policy SS3: Strategic Site Allocation – North West Preston/Bartle The development will see circa 2,767 new homes built. Utilising the Office for National Statistics average household size (2017) of 2.4 persons per household would see a potential increase in population in this area of 6,641 persons. The nearest primary care practice to this development is Ingol Health Centre which has recently benefitted from S106 contributions to support its reconfiguration. However, with the potential increase in population Ingol alone could not accommodate an additional 6,641	Noted. The majority of land in this area already benefits from existing planning consents, which has in part funded the expansion of the Ingol health Centre.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site	SS3				
	Agent							

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					persons. Several other primary care practices (including but not limited to): The Park Medical Practice, Briarwood Medical Centre, Lane Ends Surgery and ISSA (at Fulwood) may also be impacted by this development.			
D15.07	Rep'r	Andrew Leyssens	Policy	Policy SS3: Strategic Site Allocation - NW Preston / Bartle	With regards to the draft allocations, we have undertaken an initial assessment of potential issues. The assessments relate to: 1. Sites with pressurised water main within the boundary; 2. Sites with a water network structure within the boundary; 3. Sites within 500m of a wastewater treatment works; 4. Sites with a pressurised sewer within the boundary; 5. Sites with a gravity sewer in the boundary; 6. Site within an easement within the boundary; 7. Sites with land owned by United Utilities within the boundary; 8. Sites in proximity to a sewer flooding incident; 9. Site on water catchment land; 10. Sites in groundwater source protection zone 1 or 2; and 11. Sites within an on-site modelled sewer flood risk. Given the site specific issues we have raised, we request the opportunity to liaise with you in more detail on the Key Development Considerations, which may	The Councils liaised with United Utilities as part of the SHELAA site assessment work. The above constraints were provided and have therefore already been taken into consideration in the selection of the allocations. Part 3a and b of Policy SS3 and the KDC's take account of flood risk and drainage issues. The Councils will continue to work with UU through the examination process.	No	Yes
	Org.	United Utilties	Site	SS3				
	Agent							

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					not adequately address the concerns/constraints we have identified.			
D16.05	Rep'r	Mrs Lindsay Alder	Policy	Policy SS3: Strategic Site Allocation - NW Preston / Bartle	The location of these combined sites, and associated Masterplan, may result in an adverse impact on the SRN at M55 Junction 2, M55 Junction 1, and M6 Junction 32. It is therefore expected that any forthcoming Masterplan will be in agreement with National Highways, with appropriate mitigation included within the clauses of development or financial contributions provided to mitigate the identified impacts. It is identified that any forthcoming Masterplan should be considerate of the total cumulative transport impact of the development and any proposed phasing of the development should be agreed with National Highways prior to any development coming forward. This site will need to be considered in conjunction with the Preston West Allocation site (Policy SS5) in terms of potential impact to the SRN at the identified locations. With regards to the sustainable transport interventions proposed, inclusive of upgrades to Edith Rigby Way and the construction of William Young Way, and safeguarded provision for Cottam Parkway station located in the adjacent Preston West Allocation Site (Policy SS5), these policies align with the policy direction of the DfT Circular 01/2022 for sustainable transport, which states:	Noted	No	Yes
	Org.	National Highways	Site	North West Preston				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. In this regard, recent research on the location of development found that walking times between new homes and a range of key amenities regularly exceeded 30 minutes, reinforcing car dependency. Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas.			
D18.1	Rep'r Org. Agent	Mr David Dunlop The Wildlife Trust for Lancashire, Manchester & North Merseyside	Policy Site	Policy SS3: Strategic Site Allocation - NW Preston / Bartle	Policy SS3: Legal Compliance: The Bartle Wetland Biological Heritage Site, although mentioned in the text, does not appear to be shown on the Proposals Map as part of justification for the policy. SS3: Modifications: Indicate the Bartle Wetland Biological Heritage Site on the Proposals Map. Representation also states that it is very difficult to distinguish between the many different and often overlapping policies that are all mapped spatially in green. It is possible, even likely, that I have failed to notice other omissions of Biological Heritage Sites for this reason. GIS-based analysis might detect these more readily, but currently that is not an option readily available to me - we have core charitable resource for one skilled information technology officer, but around 200 core	Council note the correction required to the mapping to correctly identify the BHS. The colour comment is noted and is something which will be considered as we move through the hearings stage.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					and project staff and many volunteers distributed across three counties, so there is often quite a queue.			
D25.2	Rep'r	Mr Richard Sewell	Policy	Policy SS3: Strategic Site Allocation - NW Preston / Bartle	Policy SS3: Strategic Site Allocation – North West Preston/Bartle This allocation appears to include playing field land as shown in the below (see original rep for details). Please note that as the sites above include playing field or sports facilities, then any forthcoming development proposals that would result in their loss of prejudice their use should be consistent with NPPF paragraph 103, 104 and 200 and also Sport England's Playing Fields Policy This is especially important where Sport England would be a statutory consultee on developments that would prejudice the use of playing fields as defined by Article 16(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 in that it is on land that has been used as a playing field within the last five years, and the field encompasses at least one playing pitch of 0.2 ha or more, or that it is on land that allocated for the use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement. Sport England would wish to avoid a situation where an adopted sites allocation document encourages certain types of planning applications which Sport England later has to object to as they are not	Noted, Site Allocation SS3 does not propose development on playing fields or sports facilities.	No	No
	Org.	Sport England	Site	North West Preston				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			consistent with our Playing Fields Policy and the NPPF.			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy SS4: Strategic Site Allocation - Fulwood Barracks						Count of Representations against this policy/section:		8
A45.5	Rep'r	Taylor Wimpey UK Limited	Policy	Policy SS4: Strategic Site Allocation - Fulwood Barracks	As 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. There are various constraints and significant heritage assets on site. The assets could reduce the new developable area considerably and noting the viability issues.	The time table put forward is based on work the MOD have been undertaken in preparing this site for decommissioning, the heritage assets are know and a HIA has already been prepared in support of the development and are not seen as a hindrance to development.	No	Yes
	Org.	Taylor Wimpey UK Limited	Site	Fulwood Barracks				
	Agent	Megan Wilson						
D02.12	Rep'r	Emily Hrycan	Policy	Policy SS4: Strategic Site Allocation - Fulwood Barracks	Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm. As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.	Noted. The following changes are proposed in response to the comments received. Part (1) "…car parking, and areas of open land including playing fields and where the Battle of Preston occurred an Ancient Battlefield".	Yes MA05	No
	Org.	Historic England	Site	Fulwood Barracks				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					Suggested Modifications: Policy SS4 Text Bullet 1 should be amended to read: "…car parking, and areas of open land including playing fields and where the Battle of Preston occurred an Ancient Battlefield". Policy SS4 Bullet 3 should be amended to read: "Any application on the site must be supported by an updated HIA (taking into account the content of the Council's HIA for the site), a detailed masterplan and design code all of which takes into account for the heritage assets value of affected by the site."			
D02.13	Rep'r Org. Agent	Emily Hrycan Historic England	Policy Site	Policy SS4: Strategic Site Allocation - Fulwood Barracks Fulwood barracks	Historic England would welcome reference to the Council's HIA and make it a requirement, which would be in line with the requirements of the NPPF. Changes requested to part (1) and Part (3) of the policy. Part (1) to read the Battle of Preston rather than Ancient Battlefield. Part (3) to read: Any application on the site must be supported by an updated HIA (taking into account the content of the Council's HIA for the site), a detailed masterplan and design code all of which takes into account for the heritage assets value of affected by the site."	A proposed modification to part (1) is set out below. Policy text (1) "…car parking, and areas of open land including playing fields and where the Battle of Preston occurred an Ancient Battlefield". The HIA for this site was prepared by the MOD with support from the Council and HE, as such the word change is not included to reflect that. The Councils reocgnise that wording changes proposed may help improve the clarity of part (3) of the policy and supporting text. The Councils will continue to work with Historic England through the examination process and through and SoCG prepared.	Yes MA05	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D11.1	Rep'r	Rebecca Housam	Policy	Policy SS4: Strategic Site Allocation - Fulwood Barracks	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. The latest timescales for disposal show that the Site will cease to be operational from 2031. 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). The wording of EN1 is unclear as drafted in conflict with paragraph 16 (d) of the NPPF. The wording currently pre-empts the findings of archaeological investigations in conflict with NPPF para 207. 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. CL Playing Pitch Strategy and Action Plan - Stage E Report 2022 (and reports prior) do not list these as they are currently a private facility with no wider access.	The council notes the comments on timescales for disposal and will continue to work with the MOD on this, 2031 is still within the first 5 years as such no changes considered necessary, however the delivery of development in part 3 of the policy will be updated to year 8 as requested. Proposed modification 3. Delivery of development on the site is expected from year six eight of the plan period and is expected to complete by 2041. At this time the council do not propose to amend the number of units expected for delivery, but do not believe this hinders the development progressing and justifying a higher housing delivery as the wording states at least 300 dwellings. The council and the MOD will continue to work together to bring forward a masterplan for delivery of this strategic site. The Boundary of the site will be updated to reflect MOD ownership and areas for development. The number of units proposed in this location will require open space provision, which is considered best delivered on site. The council are aware of the concerns the MOD has raised over the life of the 3g pitch and maintenance of this facility. The council will progress these discussions through work on the masterplanning for this site	Yes MA06	Yes
	Org.	Defence Infrastructure Organisation	Site	Fulwood Barracks				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						The development will create public access to this area, including the site of the Battle of Preston. Whilst currently not public open space, this position will change on decommissioning of the barracks and access to this area should be enhanced as part of this development whilst protecting the area for its importance. The comments in regards to EN1 are unclear as to what change is considered necessary. This wording was provided to MOD in development of the plan and is consistent with the approach agreed for development of this site.		
D13.8	Rep'r	Mr Geoff Lavery	Policy	Policy SS4: Strategic Site Allocation - Fulwood Barracks	Utilising the Office for National Statistics average household size (2017) of 2.4 persons per household would see a potential increase in population in this area of 720 additional persons. 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).	Noted	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site	SS4				
	Agent							
D15.08	Rep'r	Andrew Leyssens	Policy	Policy SS4: Strategic Site Allocation - Fulwood Barracks	There is a significant wastewater network structure within the site boundary. An appropriate stand-off distance will be required. This should be agreed in liaison with United Utilities. We are therefore supportive of the Key Development Consideration for the site.	Noted	No	Yes
	Org.	United Utilties	Site	Fulwood Barracks				
	Agent							

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D16.06	Rep'r	Mrs Lindsay Alder	Policy	Policy SS4: Strategic Site Allocation - Fulwood Barracks	It is viewed that, due to the location of the site, 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. Any forthcoming Masterplan will need to demonstrate to National Highway's approval that this is not the case or offer appropriate methods of mitigation.	Noted	No	Yes
	Org.	National Highways	Site	Fulwood Barracks				
	Agent							
D25.3	Rep'r	Mr Richard Sewell	Policy	Policy SS4: Strategic Site Allocation - Fulwood Barracks	The allocation appears to include a playing pitch. Any forthcoming development proposals that would result in the loss of playing field or sports pitch facilities or prejudice their use should be consistent with NPPF and Sport England's Playing Fields Policy. This is especially important where Sport England would be a statutory consultee on developments that would prejudice the use of playing fields. Note that Sport England applies its policy to any land in use as playing field or last used as playing field and which remains undeveloped, irrespective of whether that use ceased more than five years ago. In accordance with the NPPF, new developments should contribute towards meeting the demand that they generate through the provision of on-site sports	Noted. The land in question has never been open to the public for use. The council are seeking consideration of need for open space provision on this site.	No	No
	Org.	Sport England	Site	Fulwood Barracks				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			facilities and/or providing additional off-site capacity.			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy SS5: Strategic SIte Allocation - Preston West				Count of Representations against this policy/section:		14
A12.1	Rep'r Tallentine Org. Tallentine Agent Mr Jonathan Ainley	Policy Policy SS5: Strategic SIte Allocation - Preston West Site Preston West	Savills note the land interest held by Tallentine which form part of SS5 allocation and welcome the allocation of this site which fits both with the overriding spatial strategy of the CLLP, and also paragraph 125 (c) of the NPPF which states that planning policies should give substantial weight to the value of using sustainably located land within settlements for homes and other identified needs. The Allocation is in area with established development potential and represents a logical extension of existing and upcoming development. It is acknowledge part of the site has PP for Cottam Parkway Train station and resolution to grant permission (subject to s106) has been granted on part of the site which support the principle that infrastructure exists to support this location as being deliverable. Tallentine are a willing landowner and keen to engage with the Council and other landowners to ensure the site can come forward.	Council note the support for the allocation and welcome engagement with Tallentine on progressing this allocation.	No	Yes
A31.07	Rep'r Mrs Emily Armstrong Org. F1 Real Estate Management Agent Mr John Francis	Policy Policy SS5: Strategic SIte Allocation - Preston West Site Preston West	Concern regarding the allocation being brought forward during the plan period based on number issues including - Multiple land owners which can impede development - The policy requires masterplanning of the site to deliver all the necessary	The Council's have been working with the landowners on bringing this site forward prior to considering it suitable for allocation. The Council's and the landowners do not consider there to be any overriding constraints identified to prevent this site coming forward.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			infrastructure which is an acknowledgement it cannot be delivered in the short term and site will require substantial new and upgraded infrastructure. - Operational golf course in Phase B, development not possible in plan period therefore approach is flawed. - No consideration of BNG and potential to impact on an SPA - A list of constraints exist on site as identified in the IA - Affordable housing considerations will affect viability It is also noted that the level of employment to be delivered is unlikely to be an attractive proposition in this location as such it may see land allocated for development but remain undelivered. The amount of employment land should be reduced from 50% to no more than 30ha to allow more suitably located sites to come forward such as the Stanworth site North East of M65 J3.	Landowner support has been agreed for all parcels of land. The Council is currently exploring with the landowners the correct mix of employment and housing for this allocation. The 50% split was indicative whilst agreements to bring the site forward where put in place, the council is working in more detail with the site promoters as part of wider master planning to agree the final split on this site. No change is required to the policy.		
A45.6	Rep'r Taylor Wimpey UK Limited Org. Taylor Wimpey UK Limited Agent Megan Wilson	Policy Policy SS5: Strategic SIte Allocation - Preston West Site Preston West	Preston West (SS5) is within multiple landownership. Part of site has planning for a train station, there remains a Golf Club on site and overall, there is insufficient information to confirm that all landowners are committed to development of the site for residential purposes. Furthermore, the site is within functional flood plain and contains a number of listed heritage assets	The Council's have been working with the landowners on bringing this site forward prior to considering it suitable for allocation. The Council's and the landowners do not consider there to be any overriding constraints identified to prevent this site coming forward. Landowner support has been agreed for the all parcels of land.	No	Yes

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A61.3	Rep'r	Mr Rob Haslam	Policy	Policy SS5: Strategic SIte Allocation - Preston West	Harworth strongly supports the allocation of the land at Preston West, which will help to deliver much needed residential and employment land to meet the needs of Preston and the Central Lancashire boroughs. Harworth supports the principle of a mixed-use development comprising both residential and employment development and considers that the site represents an excellent opportunity to deliver a mix of uses to meet the needs of Central Lancashire authorities. It will also be able to benefit significantly by proximity to the proposed Cottam Parkway Railway Station, which was granted planning permission in September 2023 (LPA ref. LCC/2022/0049). Harworth considers that the site is likely to be more suitable for residential development given its existing context, and that there is scope to increase the residential and reduce the commercial element of the policy. 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. This view is supported by the site analysis set out in the Central Lancashire Employment Land Study – Land Supply and OAN Update 2024. The analysis effectively concludes that	The Council note the concerns raised. PCC and Harworth group will continue to work closely on development of the Masterplan for this site. PCC are working with land owners on the correct split for this site through the masterplanning process. The 50/50 split was indicative at time of drafting and was prior to developer option on the site being agreed, In regards to the concerns around delivery of the station, the Councils can confirm it is not expected this should be delivered by the developers and PCC and LCC are actively seeking funding to deliver the station. The information from LCC states there will be a shortage of primary and secondary provision in this location as a result of this development. The council are working closely with LCC on this, and consider this site has the potential to provide the land needed to enable school place provision which will be explored further through the Masterplanning process. As such the changes proposed cannot be agreed at this time. The council will work with both land promoters on updated wording for delivery of this site in development of the Masterplan for delivery.	No	Yes
	Org.	Harworth Estates	Site	Preston West				
	Agent	Mr Brian O Connor						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			the site does have suitability for some employment development, but this should not be substantial as the site is more suited to residential development and developers and logistics businesses may prefer alternative locations which would be more market facing. Harworth agrees with this analysis and considers that the land requirement for the employment element of the policy should be reduced to reflect these considerations. Harworth considers that the proposed phasing of the site into two distinct phases is appropriate and reflects the context of the site. We don't currently believe there is an access point into Phase B (land south of the railway) capable of accommodating the proposed development. Further work on highways access is being commissioned but currently we envisage a new access point would need to be facilitated following the delivery of Phase A by providing a link across the two parcels, in the form of a bridge over the existing railway line or a new junction off Edith Rigby Way, it is expected that additional funding will be required to support and facilitate this important piece of infrastructure. A significant proportion of Phase B also comprises the existing Ashton and Lea Golf Club which is subject to a long term lease and there is some uncertainty regarding the timescales for this land to			

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					become available for development. However, the existence of this lease is not seen as a major obstacle to the long-term delivery of this site given the ability to phase future delivery from north to south and the assumption that the majority of the site will be delivered beyond the current plan period.			
B38.1	Rep'r	Miss Angel Jewitt	Policy	Policy SS5: Strategic SIte Allocation - Preston West	Nearly 2,000 homes will have a negative impact on Preston and surrounding areas. Undeveloped open countryside will be lost forever. Where is the required research and data to suggest a train station is required. How many people are expected to use the train to commute to work? The site encompasses areas of green infrastructure including a small strip of biological heritage site following the canal through the site. Preston's countryside is being destroyed for future generations. Historical buildings should be protected.	Evidence supporting the delivery of a new station formed part of the submission for the transforming Cities Fund application Transforming cities - Lancashire County Council and further information has been prepared by LCC for funding applications to deliver the station. The location has been chosen due to its proximity to existing strategic sites MD1 and MD2 in the Preston Local Plan. Furthermore, planning permission is already secured for delivery of the station. Masterplanning of the site will incorporate areas of green and blue infrastructure which will include protection of any designated land. The Key Development Considerations for this site confirm that applications for development will need to be supported by a Heritage Impact Assessment.	No	Yes
	Org.	Private Individual	Site	SS5				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D01.3	Rep'r	Eddie Graves	Policy	Policy SS5: Strategic SIte Allocation - Preston West	No specifications are made as to what development could take place, other than reference to masterplanning and an overall requirement for infrastructure. The sites should be developed only in a planned way, through pre defined phases and with specific infrastructure delivered at specified stages in the development of the wider sites, and that this needs to be set out in more detail in the plan. The impact on the surrounding landscape to the west will need to be mitigated: it is recommended that areas of strategic landscaping be identified within the allocations to achieve this. The emergency planning zone for the Westinghouse Springfields nuclear site extends into SS5, and much of site SS5 is in close proximity to what is nationally important green energy infrastructure. Consultation will need to be undertaken with the Office for Nuclear Regulation, Lancashire County Council's Emergency Planning Team and the site operators.	The councils have contacted LCC over the Springfield SPZ but do not consider this to affect delivery of this site. The development of North West Preston is set out within the Masterplan for this site. There are around 1000 dwellings still to be completed at this site and we expect to see the majority come forward within 5 years of adoption of the plan given the existing planning consent and application pending decision. Bartle Garden Village also has consent and a similar time frame is expected for a start on this site. We are still at early stages of development Preston West, with Masterplannnig expected to start in the next few months which we believe will address concerns raised around landscaping. We will continue to engage with Fylde on this sites development. 2 parcels are subject of an application by Story homes (resolution to approve subject to S106) and would be expected to come forward in the next 5 years following grant of the permission.	No	Yes
	Org.	Fylde Council	Site	Preston West				
	Agent							
D02.08	Rep'r	Emily Hrycan	Policy	Policy SS5: Strategic SIte Allocation - Preston West	The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's	Council note the comments but consider the policy addresses this sufficiently as drafted. We also note an error in the representation referring to SS3, not SS5 which this comment refers too	No	No
	Org.	Historic England	Site	SS5 Bullet 4J				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			attractiveness for business, tourism and as a place to live. Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm. As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment Proposed Mod to bullet 4J: The text should be amended to read: “The development should fully recognise the significance of the site’s heritage assets in a manner appropriate to their significance, in accordance with the Council’s HIA as a minimum.”			

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D02.09	Rep'r	Emily Hrycan	Policy	Policy SS5: Strategic SIte Allocation - Preston West	The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Historic England acknowledges that the challenge of delivering enough housing, employment and a variety of other needs, should be supported by the role heritage and culture plays in the area's attractiveness for business, tourism and as a place to live. Historic England welcomes the production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. This assessment supports the inclusion of this site in the Local Plan, which includes mitigation/enhancement measures in relation to identified harm. As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. It is important that the content of this HIA and its requirements is tied into the Plan and that it is a requirement for the redevelopment of this site. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the	The Councils consider that the policy as written is sound. The Councils recognise that wording changes may help improve the clarity of the policy and supporting text. The Councils will continue to work with Historic England through the examination process and through any SoCG prepared. We also note this is in reference to SS5, not SS3 as noted in the representation.	No	No
	Org.	Historic England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					requirements of the NPPF. Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment. Proposed Modification to EN13 text of SS5: The text of Policy EN13 for the site should be amended to read: “A In accordance with the HIA which has been completed to support allocation of the site. Development of the site will require an updated HIA to inform any development criteria that may be required to mitigate harm or enhance heritage assets resulting from development.			
D02.14	Rep'r	Emily Hrycan	Policy	Policy SS5: Strategic SIte Allocation - Preston West	*Note comments have been made under the title of EN13, but relate to the SS5 site considerations'. Historic England would welcome reference to the Council’s HIA and make it a requirement, as well as textual changes, which would be in line with the requirements of the NPPF. The text should be amended to read: “Any planning application to develop the site will need to be accompanied by an Archaeological Desk Based Assessment and/or the results of an archaeological field evaluation. The development will likely require a level of archaeological mitigation. The site contains a number of	The Councils consider the policy to be sound. The Councils recognise that wording changes proposed may help improve the clarity of the policy and supporting text. The Councils will continue to work with Historic England through the examination process and through any SoCG prepared.	No	No
	Org.	Historic England	Site	Preston West - Bullet				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					heritage assets. including: Leyland Bridge Farmhouse – A Grade II listed Building Canal Bridge Number 28 – A Grade II public road bridge Canal Bridge Number 19 Quaker's Bridge - A Grade II public road bridge Clock House - A Grade II listed Building Development of the site will require a detailed HIA to inform any development criteria that may be required to and to inform any mitigateion/enhancement measures needed harm resulting from as part of the development. A Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.			
D05.2	Rep'r Org. Agent	Angela Brookes National Grid Electricity Transmission	Policy Site	Policy SS5: Strategic SIte Allocation - Preston West Preston West	A National Grid Asset interacts with this allocation. Addition to Key Development Considerations table: Infrastructure: The development will include a strategy for responding to the National Grid Overhead Cable Route present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.	Change not considered necessary and the issue can be picked up through the detailed masterplanning stage.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D13.9	Rep'r	Mr Geoff Lavery	Policy	Policy SS5: Strategic SIte Allocation - Preston West	Utilising the ONS average household size (2017) of 2.4 persons per household would see a potential increase in population in this area of 4,440 persons. The nearest primary care practices to this development are Ingol Health Centre, The Park Medical Practice and Briarwood Medical Practice, all are also impacted by the North West 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.	Noted.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site	SS5				
	Agent							
D15.09	Rep'r	Andrew Leyssens	Policy	Policy SS5: Strategic SIte Allocation - Preston West	With regards to the draft allocations, we have undertaken an initial assessment of potential issues. The assessments relate to: 1. Sites with pressurised water main within the boundary; 2. Sites with a water network structure within the boundary; 3. Sites within 500m of a wastewater treatment works; 4. Sites with a pressurised sewer within the boundary; 5. Sites with a gravity sewer in the boundary; 6. Site within an easement within the boundary; 7. Sites with land owned by United Utilities within the boundary; 8. Sites in proximity to a sewer flooding incident; 9. Site on water catchment land; 10. Sites in groundwater source protection zone 1 or 2; and 11. Sites within an on-site modelled	The Councils liaised with United Utilities as part of the SHELAA site assessment work. The above constraints were provided and have therefore already been taken into consideration in the selection of the allocations. Part 4a and b of Policy and the KDC's take account of flood risk and drainage issues. The Councils will continue to work with UU through the examination process.	No	Yes
	Org.	United Utilties	Site	SS5				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					sewer flood risk. Given the site specific issues we have raised, we request the opportunity to liaise with you in more detail on the Key Development Considerations, which may not adequately address the concerns/constraints we have identified.			
D16.07	Rep'r	Mrs Lindsay Alder	Policy	Policy SS5: Strategic SIte Allocation - Preston West	SS5 may result in an adverse impact on the SRN at M55 Junction 2. It is therefore expected that any forthcoming Masterplan will be in agreement with National Highways, with appropriate mitigation included within the clauses of development or financial contributions provided to mitigate the identified transport impacts prior to any phase of the development coming forward. This site will need to be considered in conjunction with the North West Preston Allocation. With regards to the sustainable transport interventions proposed, these policies align with the policy direction of the DfT Circular 01/2022 for sustainable transport.	Noted	No	Yes
	Org.	National Highways	Site	Preston West				
	Agent							
D25.4	Rep'r	Mr Richard Sewell	Policy	Policy SS5: Strategic SIte Allocation - Preston West	This allocation appears to include Ashton & Lea Golf Club. Any forthcoming development proposals that would result in their loss of prejudice their use should be consistent with NPPF and Sport England's Playing Fields Policy. This is especially important where Sport England would be a statutory consultee	Noted	No	No
	Org.	Sport England	Site	Preston West				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			on developments that would prejudice the use of playing fields. Note that Sport England applies its policy to any land in use as playing field or last used as playing field and which remains undeveloped, irrespective of whether that use ceased more than five years ago.			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy SS6 (A&B) Strategic Site Allocation - Pickering's Farm, Penwortham				Count of Representations against this policy/section:	7			
B50.1	Rep'r	Taylor Wimpey and Homes England	Policy	Policy SS6 (A&B) Strategic Site Allocation - Pickering's Farm, Penwortham	Support the continued allocation of the site. Modifications to SS6A's Key Development Considerations (KDCs) are proposed. EN1 + ID2 should cite the allocation's planning permissions. ST2 should remove reference to connectivity from multiple access points and cite the allocation's planning permission. D1 should refer exclusively to and outline permission for infrastructure. HS6 + HS7 should reference viability as a consideration. EN16 should be deleted.	The council welcomes the support and responds to the Representor's proposed modifications as follows: -EN1 & ID2: It is unnecessary to repeatedly quote the site's extant planning permissions. The residual proposed modifications do not add value. - ST2: It is unnecessary to repeatedly quote the site's extant planning permissions. Removing the requirement for 'multiple' access points to the highway, risks precluding delivery of potential North and South accesses.The residual proposed modifications do not add value. - D1: The proposed modification does not add value. Theoretically an infrastructure delivery schedule could be submitted through a Full application process too. - HS6/HS7: The Councils reject the Representor's proposed modification. It is not intended that KDCs should make additional requirements above their respective parent policies. Please see the Councils responses regarding HS6 and HS7 regarding viability for further detail - EN16: This is still considered necessary. The council is not aware of any detailed	No	Yes
	Org.	Taylor Wimpey and Homes England	Site	SS6A & B				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						studies of this nature regarding the Un permissioned agricultural land.		
D03.4	Rep'r	Helen Holland	Policy	Policy SS6 (A&B) Strategic Site Allocation - Pickering's Farm, Penwortham	*Note that comments are made in context of SS3-SS6* There is insufficient evidence to demonstrate that these allocations are deliverable over the Plan period. Implementation is reliant on the provision of major and costly new infrastructure, which often results in delay and can prejudice viability.	The Representation is presumptuous and lacks its own evidence/detail to justify this position. The Plan's Strategic Sites are deliverable. Many parcels already have planning permission and are actively being promoted. Much of Pickering's Farm is even being promoted by Homes England, which is a government agency with a remit to accelerate housing delivery. Representations have been received from all Strategic Site promoters, including details regarding delivery.	No	Yes
	Org.	Blackburn with Darwen Borough Council	Site					
	Agent							
D04.03	Rep'r	Laura Marchant	Policy	Policy SS6 (A&B) Strategic Site Allocation - Pickering's Farm, Penwortham	Support the proposed allocation. No modifications to the Key Development Considerations are proposed.	Support is welcomed.	No	Yes
	Org.	Homes England	Site	SS6A & B				
	Agent							
D05.3	Rep'r	Angela Brookes	Policy	Policy SS6 (A&B) Strategic Site Allocation - Pickering's Farm, Penwortham	The proposed Key Development Considerations (KDCs) should respond to the existing overhead cable route running through the site. The below modification is proposed in the interests of making the policy more effective: The development will include a strategy for responding to the National Grid Overhead Cable Route present within the site which demonstrates how the National Grid Design Guide and Principles	It is expected that the National Grid will be consulted regarding applications at the site during the usual Development Management process. Consequently, it is unnecessary to reference this specific requirement within the policy.	No	No
	Org.	National Grid Electricity Transmission	Site	SS6A & B				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.			
D13.11	Rep'r	Mr Geoff Lavery	Policy	Policy SS6 (A&B) Strategic Site Allocation - Pickering's Farm, Penwortham	A development within the Charnock & Farington West wards comprising circa 79ha land, for the Charnock (A) phase, the development will see the construction of circa 1,350 new homes. The Farrington (B) phase will see the construction of circa 545 new homes on circa 22ha of land, equating to a total of 1,895 new homes. Utilising the Office for National Statistics average household size (2017) of 2.4 persons per household would see a potential increase in population in this area of ,4548 additional persons. The nearest primary care practices that could be affected by this development are The Park Medical Practice and Briarwood Medical Practice, which are also impacted by the Northwest Preston / Bartle (Policy SS3) and Preston West (Policy SS5) developments. Additionally, Lane Ends Surgery, St Fillans and the Fishergate Surgery could all be impacted by this development. Within the policy reference is made for S106 developer contributions to support a Cross Borough Link Road (CBLR), traffic management measures and/or pedestrian improvements on existing roads, affordable housing etc. The Strategic Policies noted above state similar provisions as well as provision for	Noted. The KDC's confirm that a planning contribution may be required to mitigate the impacts of development in line with Policy ID2. Policy ID2 includes the provision of health facilities. The Plan should be read as a whole.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site	SS6A & B				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					schools etc., unfortunately there are no references within any of the policies to support health infrastructure. This funding, through S106/CIL, is essential as it is the only route to fund additional capacity in NHS primary care facilities in the relevant areas to support a growing population.			
D15.10	Rep'r Org. Agent	Andrew Leyssens United Utilties	Policy Site	Policy SS6 (A&B) Strategic Site Allocation - Pickering's Farm, Penwortham	With regards to the draft allocations, we have undertaken an initial assessment of potential issues. The assessments relate to: 1. Sites with pressurised water main within the boundary; 2. Sites with a water network structure within the boundary; 3. Sites within 500m of a wastewater treatment works; 4. Sites with a pressurised sewer within the boundary; 5. Sites with a gravity sewer in the boundary; 6. Site within an easement within the boundary; 7. Sites with land owned by United Utilities within the boundary; 8. Sites in proximity to a sewer flooding incident; 9. Site on water catchment land; 10. Sites in groundwater source protection zone 1 or 2; and 11. Sites within an on-site modelled sewer flood risk. Given the site specific issues we have raised, we request the opportunity to liaise with you in more detail on the Key Development Considerations, which may	The Councils liaised with United Utilities as part of the SHELAA site assessment work. The above constraints were provided and have therefore already been taken into consideration in the selection of the allocations. The KDC's for the Pickering's Farm site take account of flood risk and drainage issues and early dialogue with UU is recommended. The Councils will continue to work with UU through the examination process.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					not adequately address the concerns/constraints we have identified.			
D16.08	Rep'r	Mrs Lindsay Alder	Policy	Policy SS6 (A&B) Strategic Site Allocation - Pickering's Farm, Penwortham	Any amendments to the masterplan should be agreed with National Highways.	National Highways will be consulted should a planning application be received which seeks to amend the Masterplan or proposes development which will have an impact on the strategic highway network.	No	Yes
	Org.	National Highways	Site	SS6A & B				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Chapter 4: Balanced Housing Market				Count of Representations against this policy/section:		1
B05	Rep'r Mr Gary Moor Org. Private Individual Agent	Policy Chapter 4: Balanced Housing Market Site	Concerns regarding how the plan and a particular site will affect the environment. No further detail or the site name was provided.	Noted. If further detail is revealed during the examination, we will respond to this in due course.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requireme					Count of Representations against this policy/section:		35
A14.1	Rep'r	P Wild and C & V Kerr	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Capped Requirement - Contrived, unnecessarily capped, means to comply with the transitional arrangements. - Arbitrary and flawed process, and is not a sound, evidence-based approach. - 1,237 dpa requirement is 77 dpa short of being 80% of the local housing need figure of 1,634 dpa. - Simply adding 77 dpa to the evidenced (employment-led growth scenario CR-1:1) housing requirement is not what the Government envisaged. Housing Supply Headroom - Housing land supply evidence base shows that there is available supply in Central Lancashire to meet a more ambitious housing requirement without releasing Green Belt. - Past delivery rates show that there is market capacity to deliver more. - Should have a 15% or 20% supply buffer, currently its 8% - projected completions of 25,579 dwellings minus the proposed requirement of 23,652 dwellings. - Higher figure than 23,652 net new dwellings should be set and this can be achieved by allocating more land for inclusion in Policy HS4 and including our clients' joint omission site at Land east and west of Dixons Lane, Grimsargh, and Land to the rear of 203 Preston Road, Grimsargh.	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). Policy HS1 seeks to meet housing needs in Central Lancashire; to provide homes and access to the housing market and to deliver affordable housing for those priced out or unable to access housing at market prices. The policy sets out the overall scale of housing required, the number of homes that will provide net additional dwellings over the plan period, and how this is distributed across the three component Council areas. No further supply is required. The Central Lancashire Authorities have drawn on information in the SHELAA to	No	Yes
	Org.	Private Individual	Site				
	Agent	Mr Graham Love					

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						identify a sufficient supply and mix of specific deliverable and developable sites to meet the area's identified housing and employment land requirements. The Housing Trajectories set out in Appendix 3 of the Local Plan demonstrate an additional 8% supply above requirements over the whole plan period. The Central Lancashire Trajectory, in Appendix 3 of the Local Plan, demonstrates that for the first five years of the plan (2026/27 to 2030/31) the total projected completions are 30% above the requirement.		
A15.1	Rep'r Org. Agent	AAB Developments Ltd and Lester Developments Ltd AAB Developments Ltd and Lester Developments Ltd Mr Graham Love	Policy Site	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Capped Requirement - Contrived, unnecessarily capped, means to comply with the transitional arrangements. - Arbitrary and flawed process, and is not a sound, evidence-based approach. - 1,237 dpa requirement is 77 dpa short of being 80% of the local housing need figure of 1,634 dpa. - Simply adding 77 dpa to the evidenced (employment-led growth scenario CR-1:1) housing requirement is not what the Government envisaged. Housing Supply Headroom - Housing land supply evidence base shows that there is available supply in Central Lancashire to meet a more ambitious housing requirement without releasing Green Belt. - Past delivery rates show that there is market capacity to deliver more. - Should have a 15% or 20% supply buffer, currently its 8% - projected	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). Policy HS1 seeks to meet housing needs in Central Lancashire; to provide homes	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					completions of 25,579 dwellings minus the proposed requirement of 23,652 dwellings. - Higher figure than 23,652 net new dwellings should be set and this can be achieved by allocating more land for inclusion in Policy HS4 and including our client's omission site at land south of Broughton Park, Whittingham Lane, Broughton.	and access to the housing market and to deliver affordable housing for those priced out or unable to access housing at market prices. The policy sets out the overall scale of housing required, the number of homes that will provide net additional dwellings over the plan period, and how this is distributed across the three component Council areas. No further supply is required. The Central Lancashire Authorities have drawn on information in the SHELAA to identify a sufficient supply and mix of specific deliverable and developable sites to meet the area's identified housing and employment land requirements. The Housing Trajectories set out in Appendix 3 of the Local Plan demonstrate an additional 8% supply above requirements over the whole plan period. The Central Lancashire Trajectory, in Appendix 3 of the Local Plan, demonstrates that for the first five years of the plan (2026/27 to 2030/31) the total projected completions are 30% above the requirement.		
A17.3	Rep'r	Persimmon Homes and Charles Church Lancashire	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Plan Period is too short - Proposed period is 2023 to 2041- based on the Council's own LDS, the period will be 14 years 3 months after adoption and not cover 15 years -As a minimum should extend to 2042 but based on experience elsewhere Examinations can take much longer, not sound Use of the transitional	The Plan period is 2023 to 2041. The housing trajectories at Appendix 3 of the Local Plan show that there are three pre adoption years (2023/24 to 2025/26) followed by 15 years (2026/2027 to 2040/41). The approved Local Development Scheme (LDS) 2024 indicates adoption by no later than 31st December 2026, thereby falling within the first year of the year 1-5 period. The Local Plan remains on track against the	No	Yes
	Org.	Persimmon Homes and Charles Church Lancashire	Site					
	Agent	Stephen Harris						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			arrangements/overall requirement - Accept basis of meeting 80% of the standard method which is 1,314 dwellings - Part of the consortium instructed Stantec to prepare a Housing Needs Assessment for CL – not sound, should be revised to meet at least the standard method of 1,643 dpa - Authorities have fallen into error due to the increase of 77 dpa to meet the transitional arrangements - Increase is not evidence based and is simply a mathematical calculation to meet the transitional arrangements, does not fall within the scope of the PPG circumstances - Paragraph 2a-010 - PPG list is not exhaustive, but any increase should be evidence based and for that reason the - plan is not sound and therefore cannot be considered under the 2023 Framework - Under the standard method the total requirement would be 29,574 dwellings - 5,922 dwellings not being planned for - Authorities have added 77 dwellings to the annual requirement to avoid the need to plan for an additional 329 dpa – arbitrary, not sound - Not on the public record of when it was agreed that additional 77 homes would be applied - Not 80%, shortfall of 7 dwellings. Below recent delivery levels - The 10 year delivery average is 1,650dpa and the 5 year average is 1,920dpa - No provision in the Plan for an early	local plan preparation stages and timings set out in the LDS. The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). Paragraph 4.14 of the Local Plan recognises the need to consider "previous delivery, market trends and signals" when assessing housing need and these factors are considered in the Central Lancashire Housing Study Update, DLP December 2024. Policy HS1 seeks to meet housing needs in Central Lancashire; to provide homes and access to the housing market and to deliver affordable housing for those priced out or unable to access housing at market prices. The policy sets out the overall scale of housing required, the number of homes that will provide net		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			review, 20% increase between the requirement in HS1 and the standard method is a significant change which justifies an early review Distribution of Housing Requirements - Sole reason that the change in distribution is so that Green Belt release in Chorley was not required paragraph 5.2 of Housing and Employment Allocations: Site Selection Process (HO16) states: "5.2 Chorley had unmet need against the housing requirement set out in the Housing Study however Preston and South Ribble were able to meet this unmet need therefore a redistribution of the Housing Study requirements was applied. As such Green Belt release in Chorley was not required and could not be justified." - Reduction applied to Chorley and the increase to South Ribble should be altered so that the outcome of the Central Lancashire Housing Study is applied.	additional dwellings over the plan period, and how this is distributed across the three component Council areas. No further supply is required. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 204, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward.		
A18.2	Rep'r	Mr Terry Cooper	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Insufficient Requirement - Providing 80% of local housing needs completely undermines the ambitious economic growth strategies being pursued across Lancashire. Inappropriate Distribution/Not enough housing in Chorley - disproportionate approach is being taken in respect of the housing distribution across the three districts, with more needed to be redistributed towards Chorley. - Land should be released from the Green Belt to meet local housing needs in Chorley and thereby reduce the commuting to other areas that will inevitably occur. - Chorley has its own distinct housing market; its needs should not be met in Preston. - Green Belt release and safeguarded land is required for Chorley to meet a higher proportion of its own housing needs (rather than redirecting these to Preston in particular).	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). Policy HS1 seeks to meet housing needs	No	Yes
	Org.	Private Individual	Site					
	Agent	Soulla Rose						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				in Central Lancashire; to provide homes and access to the housing market and to deliver affordable housing for those priced out or unable to access housing at market prices. The policy sets out the overall scale of housing required, the number of homes that will provide net additional dwellings over the plan period, and how this is distributed across the three component Council areas. No further supply is required. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery		

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						of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward.		
A21.1	Rep'r	Mr Nick Scott	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Plan Period - Given potential preparation delays the plan period should extend to 2042, as a minimum. - Given the scale of the proposed Strategic Site Allocations at North West Preston / Bartle; Preston West; and Penwortham current global economic and political instability - a longer plan period should be considered, an additional 5 years (or more) could provide additional flexibility. Transitional Arrangements - The level of housing growth has been set arbitrarily to accord with the transitional arrangements, by 'simply'	The Plan period is 2023 to 2041. The housing trajectories at Appendix 3 of the Local Plan show that there are three pre adoption years (2023/24 to 2025/26) followed by 15 years (2026/2027 to 2040/41). The approved Local Development Scheme (LDS) 2024 indicates adoption by no later than 31st December 2026, thereby falling within the first year of the year 1-5 period. The Local Plan remains on track against the local plan preparation stages and timings set out in the LDS. The identified housing supply is sufficient to meet the transitional	No	Yes
	Org.	Ther Emerson Group	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			adding 77 dwellings per annum to 'top-up'	arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). Paragraph 4.14 of the Local Plan recognises the need to consider "previous delivery, market trends and signals" when assessing housing need and these factors are considered in the Central Lancashire Housing Study Update, DLP December 2024. Policy HS1 seeks to meet housing needs in Central Lancashire; to provide homes and access to the housing market and to deliver affordable housing for those priced out or unable to access housing at market prices. The policy sets out the overall scale of housing required, the number of homes that will provide net additional dwellings over the plan period, and how this is distributed across the three component Council areas. No further supply is required.		

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				As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 204, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward.		
A24.3	Rep'r	Mrs Joanne Harding	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	80% - It is the HBF's understanding that the intention of the 80% allowance in the standard method was for it to be a test to be applied to Plans that were an advanced stage of preparation and were progressing and had already set a housing number. - If was 80% or more, then the benefits of continuing with a plan and getting a plan in place, albeit with lower numbers, outweighed the disbenefits of not having a Plan - The 2024 NPPF clearly sets out that Plans at Reg 19 stage should be meeting at least 80% - Plans that are only aiming to deliver 80% of their part of the national requirement cannot be consistent with the wider Government housing policy objectives. Plan Period - Should cover a period of 15 years from the adoption of the Plan, this is unlikely, and the Plan period should be extended until at least 2042. Distribution should be deliverable - Housing Study Update (Dec 2024)	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). The Plan period is 2023 to 2041. The housing trajectories at Appendix 3 of the Local Plan show that there are three pre adoption years (2023/24 to 2025/26) followed by 15 years (2026/2027 to 2040/41). The approved Local Development Scheme (LDS) 2024 indicates adoption by no later than 31st	No	Yes
	Org.	Home Builders Federation	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Employment led scenario proposed distribution split is not continued into Local Plan policy.	December 2026, thereby falling within the first year of the year 1-5 period. The Local Plan remains on track against the local plan preparation stages and timings set out in the LDS. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 204, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward.		
A25.3	Rep'r	Mr Lee Bootle	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Should exceed 80% of LHN - Plan does not meet the significant increases in LHN, jointly or at a local authority level, as a minimum should be planning for the Standard Method LHN to meet nationally identified housing and employment needs for the full plan period. - Whilst the CLLP accords with Paragraph 234a, this is by a very narrow margin as it meets exactly 80% of the local housing need, should plan holistically. Shortfall for Chorley - Plan particularly falls short in providing for Chorley's housing need, meeting only 59% of the new LHN and doesn't properly plan for the current and future housing needs of Chorley.	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). As confirmed by the Housing Study Update, Central Lancashire is a	No	Yes
	Org.	Private Individual	Site					
	Agent	Ms Hope Bleasdale						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 204, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been		

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						identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward.		
A26.4	Rep'r	Miss Georgina Cox	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Transitional Arrangements - Question whether the transitional arrangements should be applied in this case at all, as the 80% threshold is only achieved by incorporating an uplift of 77 dpa. - No clear evidence has been provided to explain or justify the resulting housing requirement. - Evidence supporting the plan is using a 2023 NPPF methodology for calculating housing needs, uplifted for economic factors and results in a figure that meets 76% of the new stock-based housing requirement. - Through incorporating the arbitrary uplift to this figure, the plan creates a conflict within itself as the housing requirement is then based on achieving 80% of the up to date standard method figure as per NPPF 2024, but the plan will be examined under NPPF 2023, which requires the Council to use the previous standard method as the starting point. - The evidence base does not support the approach and as such the transitional arrangements have not been met and the proposed housing requirement is not justified. - CLLP has been fast-tracked towards submission to limit growth to the absolute minimum and avoid delivering	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). The Central Lancashire Authorities have drawn on information in the SHELAA to identify a sufficient supply and mix of specific deliverable and developable sites to meet the area's identified housing and employment land requirements. The Housing Trajectories set out in Appendix 3 of the Local Plan demonstrate an additional 8% supply above requirements over the whole plan	No	Yes
	Org.	Gladman Developments	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					against LHN, which contradicts the Government's housing delivery objectives. Insufficient Buffer - Buffer should be higher - 23,652 new homes are planned to be built, projected completions are estimated at 25,579, representing a buffer of 7.5%, at regulation 18 the supply surplus was 10%. - Buffer should be increased given the Plan's reliance on large strategic sites to deliver 19% of the overall supply. Need for Review - CLLP should include a specific review policy clearly detailing the preparation of a new Local Plan to address the sizeable shortfall against LHN.	period. The Central Lancashire Trajectory, in Appendix 3 of the Local Plan, demonstrates that for the first five years of the plan (2026/27 to 2030/31) the total projected completions are 30% above the requirement. Each Council will monitor delivery rates within their area annually in accordance with a published trajectory to ensure delivery rates are maintained. A review of policy HS1 will be undertaken jointly by the three Councils no less than every five years to ensure it is up-to-date and meets the requirements of national policy.		
A27	Rep'r Org. Agent	Mr James Reid Miller Homes Ms Vanessa Rowell	Policy Site	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Transitional Arrangements The housing requirement has been artificially increased to achieve the 80% threshold, rather than the selected employment-led commuting ratio 1 to 1 housing need methodology. The increase of 77 dwellings per annum to achieve the threshold, cannot be considered a 'policy-on' approach either to justify the increase in the housing requirement. Employment Projects Not Reflected The employment-led scenario should include the jobs forecasted for the	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils	No	No

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					National Cyber Force Innovation Hub (3,000 jobs in the county & up to 1,500 indirect jobs). Proposed housing requirement is not based on the standard method for Local Housing Need, nor a robust and justified alternative methodology.	meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a).		
A30.1	Rep'r Org. Agent	Nightingale Land Nightingale Land Mr John Fleming	Policy Site	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	The Local Plan is aiming to meet the absolute minimum requirement, so it is essential that proposed Housing Allocations remain within the Local Plan.	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024). Policy HS1 seeks to meet housing needs in Central Lancashire; to provide homes and access to the housing market and to deliver affordable housing for those priced out or unable to access housing at market prices. The policy sets out the overall scale of housing required, the number of homes that will provide net additional dwellings over the plan period, and how this is distributed across the three component Council areas.	No	Yes
A31.08	Rep'r Org. Agent	Mrs Emily Armstrong F1 Real Estate Management Mr John Francis	Policy Site	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Insufficient Level of Housing The amount of housing proposed through the CLLP (housing land requirement) is not sufficient in terms of quantum over the plan period. Lack of Housing in Chorley The housing requirement is not distributed in the most appropriate places to meet demand.	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional	No	Yes

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			There a substantive reduction in the local plan requirement for Chorley of 30% (410 dpa vs 287 dpa, comparing Tables 2 and 3), and increases of 13% and 17% for Preston and South Ribble respectively. 61% of the 77 dpa uplift (47 units) is applied to Chorley. No reason or justification is given to why the uplift follows a totally different approach to redistribution, other than that the three authorities had reviewed the situation and consider this to be justified under transitional arrangements. This is not a justified approach nor is it satisfactorily evidence. It suggests a contrived redistribution of housing requirement and it shows no clear evidential link to the Employment-led Housing Study from which it derives which is supposed to link the housing requirement to the employment growth in each authority. Chorley is significantly under-provided for in housing growth in the plan period and disconnected from employment growth. The approach will lead to unsustainable patterns of development.	Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a		

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						sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward.		
A32.2	Rep'r	Mr Stephen Glenn	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Transitional Arrangements - Draft policy HS1 housing requirement only equates to 79%, transitional arrangements not met. - Housing requirement should not be arbitrarily set at 80%, not positively prepared, should apply a clear and justified method as set out in NPPG paragraph 61. Flawed Distribution Approach - The average completion rate for Chorley broadly reflects the NPPF23 standard method figure. - In contrast, the NPPF23 LHN for Preston and South Ribble is significantly below the past average completion rates within these two authorities over the same period. - The NPPF23 based LHN for Preston and South Ribble does not take account of committed growth strategies & strategic infrastructure improvements funded through the City Deal. - Plan redistributes housing need away from Chorley to Preston and South Ribble rather than with the identified need. - Redistributing this amount of housing need away from Chorley, which also has the highest affordable housing need in Central Lancashire, will result in sustainable settlements not being able to grow, is not a 'reasonable' alternative option to Green Belt release.	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach	No	Yes
	Org.	Northern Trust Land Ltd	Site					
	Agent	Mr Alexis De Pol						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Insufficient housing in Chorley - Redistributing so much of Chorley's housing need to Preston and South Ribble will worsen the affordable housing shortfall in Chorley and undermine the ability to meet other specialist housing requirements. Stepped Requirement for Chorley - The proposed stepping of the housing requirement in Chorley is inappropriate and unnecessarily delays meeting identified development needs, conflicts with paragraph: 012 Reference ID: 68-021-20190722 of the PPG - There are no strategic sites within Chorley of a scale that would justify the need for a stepped housing requirement. Flawed Evidence Base - Central Lancashire Housing Study Update - Explanatory text to policy HS1 states employment led approach provides the basis of the CLLP housing requirement because it aligns housing need with anticipated job growth, reinforces sustainable patterns of commuting and reflects market signals and previous rates of delivery. - CLLP's own evidence base identifies the employment-led housing need in Chorley as 410dpa. - The Stantec report dated 8 April 2025, Central Lancashire Housing Need, questions the robustness of the conclusions reached in the employment-led assessment/scenario, which is based on overly cautious employment forecasts, makes mistakes in the data	promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward. The housing requirement in Chorley is stepped over the plan period to take		

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					used and highlights that the requirement figures would fail to adequately meet affordable housing need which is significantly underestimated, especially in Chorley. - The alternative employment-led housing need assessment underpinning the draft housing requirement underestimates the housing need in Chorley and Central Lancashire as a whole.	account of low delivery rates in the earlier years of the plan. Delivery is expected to start to increase upon adoption of the plan as new allocations become available for development. The requirement has been stepped from 280 dwellings per annum in the first 3 years of the plan period (2023/24 to 2025/26) increasing to 345 dwellings per annum from 2026/27 onwards i.e. from the point of anticipated adoption.		
A39.5	Rep'r Org. Agent	Castle Green Homes Castle Green Homes Mrs Kerry Walker	Policy Site	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Employment-led (CR 1-to-1) scenario is Policy Off •This Policy Off' approach makes no allowance for any major public sector programmes which might generate jobs above the baseline. •The Housing Study Update (HSU) refers to the Central Lancashire Employment Land Study (CLELS) and its labour supply model, which is policy off, unlike the 2017 and 2019 CLELS •The CLELS states that there are no clear forecasts of the jobs growth resulting from other strategic projects proposed in Central Lancashire, at this time, most notably, the development of the National Cyber Security Centre at Samlesbury •Next steps' section with the HSU explains that "The final housing requirement or requirements set in the Joint Local Plan may be different to the relative proportions within the recommended dwelling need scenario, depending on the Councils' further assessment of policy-on and plan-making considerations."	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). The Plan period is 2023 to 2041. The housing trajectories at Appendix 3 of the Local Plan show that there are three pre adoption years (2023/24 to 2025/26) followed by 15 years	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			• There does not appear to be any 'policy on' assessment to consider the implications of significant employment led opportunities which are likely to be created at locations, including the Salmesbury Investment Zone anywhere in the evidence base. • There are Lancashire County Council January 2025 job forecasts for the Samlesbury Enterprise Zone which should be factored into the evidence base for the emerging CLLP. • The evidence does not appear to have fully factored in existing commitments and investment impacts from the City Deal, which are likely to continue to deliver during the CLLP plan period. • Employment-led (CR 1-to-1) scenario is likely to be an underestimation of the actual employment led housing need given the national cyber security and its associated benefits have not been incorporated (and evidence relating to affordable housing/C3 needs). Transitional Arrangements • The CLLP fails to achieve 80% of the new LHN figure - it is now 79%. • The transitional arrangements of paragraph 234a of the NPPF are not engaged. • The 77-dwelling addition to the employment led housing figure is largely arbitrary, simply trying to meet 80% of the LHN figure, which in any case it fails to achieve. Plan Period • Given the stage of the Plan preparation and the anticipated lead in times for the potential submission, examination and adoption on the Plan,	(2026/2027 to 2040/41). The approved Local Development Scheme (LDS) 2024 indicates adoption by no later than 31st December 2026, thereby falling within the first year of the year 1-5 period. The Local Plan remains on track against the local plan preparation stages and timings set out in the LDS. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of		

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			the Plan period should be extended until at least 2042 so that it covers 15 years from adoption. Distribution of Housing • The CLLP does not reflect the distribution recommendations within the HSU. • A clear assessment is needed as to why the distribution has changed so dramatically from the HSU, largely at the expense of Chorley's housing figures, and against the economic growth aspirations of the three Council's. Stepped approach for Chorley • No evidence to support the stepped approach which will further exacerbate the lack of housing and affordable housing in Chorley in the early part of the Plan period. Evidence Integration • It is not clear how the Chorley Borough Housing Demand and Need Assessment (HDNA) 2024 (which provides the council with up-to-date evidence on housing need across all sections of the community) interacts with the HSU. Affordable Housing Need • The CLLP will not deliver the affordable housing needed (across the Local Plan area as this is more than 50% of the overall housing requirement as set out in the CLLP. • The inclusion of C3 units within the overall figure needs to be clarified as to whether the need for 2,648 additional C3 dwelling units over the period 2023 to 2041 is included in the requirement.	the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward. The housing requirement in Chorley is stepped over the plan period to take account of low delivery rates in the earlier years of the plan. Delivery is expected to start to increase upon adoption of the plan as new allocations become available for development. The requirement has been stepped from 280 dwellings per annum in the first 3 years of the plan period (2023/24 to 2025/26) increasing to 345 dwellings per annum from 2026/27 onwards i.e. from the point of anticipated adoption.		

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A43.1	Rep'r	PJM Property Investment Limited	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Transitional Arrangements •The supporting text to Policy HS1 (paragraph 4.19) explains that the employment led growth scenario CR-1:1 requirement of 1,237 dpa has been "slightly increased" by adding 77 dpa to achieve 80% of the revised local housing need figure. •This arbitrary process is clearly contrived and therefore flawed, and is not a sound, evidenced based approach. •Based on the Written Ministerial (HCWS48) "Building the New Homes we Need" (July 2024) all Local Authorities must plan to meet as much of their requirement as possible and make every effort to allocate land in line with their housing need as per the standard method. •There is available supply to meet a more ambitious housing requirement than 80% of the local housing need, including sites in the Green Belt that can be released and allocated without undermining the function of the Green Belt. Market Capacity & Buffer •There is a market capacity to deliver a high figure based on previous annual completion rates. •A more appropriate buffer should be provided, at least 15% or ideally 20%, by allocating more land.	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). Policy HS1 seeks to meet housing needs in Central Lancashire; to provide homes and access to the housing market and to deliver affordable housing for those priced out or unable to access housing at market prices. The policy sets out the overall scale of housing required, the number of homes that will provide net additional dwellings over the plan period, and how this is distributed across the three component Council areas. No further supply is required. The Central Lancashire Authorities have drawn on information in the SHELAA to identify a sufficient supply and mix of specific deliverable and developable sites to meet the area's identified	No	Yes
	Org.	PJM Property Investment Limited	Site					
	Agent	Mr Andrew Taylors						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						housing and employment land requirements. The Housing Trajectories set out in Appendix 3 of the Local Plan demonstrate an additional 8% supply above requirements over the whole plan period. The Central Lancashire Trajectory, in Appendix 3 of the Local Plan, demonstrates that for the first five years of the plan (2026/27 to 2030/31) the total projected completions are 30% above the requirement.		
A44.2	Rep'r	Mr Jack Pikington	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	• Planning for only 80% of the identified housing need is inadequate and risks worsening affordability and limiting economic growth. • Lacks flexibility, as no clear mechanism to bring forward additional sites if current allocations fail to deliver, creating a risk of long-term under-supply.	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). Each Council will monitor delivery rates within their area annually in accordance with a published trajectory to ensure delivery rates are maintained. A review of policy	No	Yes
	Org.	Seddon Homes	Site					
	Agent	Mr Josh Hellawell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						HS1 will be undertaken jointly by the three Councils no less than every five years to ensure it is up-to-date and meets the requirements of national policy.		
A45.2	Rep'r	Taylor Wimpey UK Limited	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Plan Period •Strategic policies should anticipate and address longer-term needs and opportunities over a minimum of 15 years after, adoption in 2026 is highly unlikely. •As an absolute minimum the Plan period is extended by 1 year to run until 2042, given the strategic nature of some of the proposed allocations the period should be extended to 2043. Redistribution •The needs arising from Chorley are being disproportionately distributed between Preston and South Ribble. Employment Led Scenario •Cambridge Econometrics employment led scenario is a cautious approach. •The planned delivery of the National Cybers Force headquarters in Samlesbury is not reflected. •The supporting Local Housing Need Assessment prepared by Stantec concludes that an additional 1,500 employees from the headquarters could require housing in the area. Transitional Arrangements •The Councils have arbitrarily added 77 dwellings to the requirement simply so that they don't have to commence a new Plan which flies directly in the face of the need to boost housing. •Additional consideration should be	The Plan period is 2023 to 2041. The housing trajectories at Appendix 3 of the Local Plan show that there are three pre adoption years (2023/24 to 2025/26) followed by 15 years (2026/2027 to 2040/41). The approved Local Development Scheme (LDS) 2024 indicates adoption by no later than 31st December 2026, thereby falling within the first year of the year 1-5 period. The Local Plan remains on track against the local plan preparation stages and timings set out in the LDS. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider	No	Yes
	Org.	Taylor Wimpey UK Limited	Site					
	Agent	Megan Wilson						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			given to boosting the supply of affordable housing through increasing overall housing requirements.	approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward. The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a).		
A50.1	Rep'r	Mr ChristiaN Orr	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Plan Period •End date of the strategic policies relating to housing and employment land supply is 31 March 2024, based on the Council's own proposed timetable, the plan will only have a plan period of 14 years 3 months after adoption, it would not cover a period of 15 years. •Plan is adopted no later than December 2026, the Local Plan period must be extended to 2042 as a minimum to be consistent with national planning policy. Transitional Arrangements •The Plan has been prepared based on meeting exactly 80% of the standard method. •Increase is not evidence based, simply a mathematical calculation, doesn't meet the PPG. •77 dwellings have been added to the annual requirement to avoid the need to plan for an additional 5,922 homes over	The Plan period is 2023 to 2041. The housing trajectories at Appendix 3 of the Local Plan show that there are three pre adoption years (2023/24 to 2025/26) followed by 15 years (2026/2027 to 2040/41). The approved Local Development Scheme (LDS) 2024 indicates adoption by no later than 31st December 2026, thereby falling within the first year of the year 1-5 period. The Local Plan remains on track against the local plan preparation stages and timings set out in the LDS. The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning	No	Yes
	Org.	Hollins Strategic Land	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			the plan period using the standard method. •Not on the public record when it was agreed that the additional 77 homes would be applied. •The requirement in HS1 is arbitrary. Market Suppression •Central Lancashire has proved that it can deliver a high level of net additions and the proposed requirement is a suppression of what the market can deliver. Early Review •No provision in the Plan for an early review. •The 20% increase between the requirement in HS1 and the standard method is a significant change which justifies an early review. Distribution of the Housing Requirement •The sole reason for the change in distribution is so that Green Belt release was not required which is contrary to the housing need evidence for the Plan. •Given that the increase in the requirement in HS1 is for economic growth as well as to meet the transitional arrangements, we consider that the reduction applied to Chorley and the increase to South Ribble should be altered so that the outcome of the Central Lancashire Housing Study is applied. Supply Buffer •A buffer of at least 20% should be applied to provide sufficient flexibility in the housing land supply.	Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). Policy HS1 seeks to meet housing needs in Central Lancashire; to provide homes and access to the housing market and to deliver affordable housing for those priced out or unable to access housing at market prices. The policy sets out the overall scale of housing required, the number of homes that will provide net additional dwellings over the plan period, and how this is distributed across the three component Council areas. No further supply is required. Each Council will monitor delivery rates within their area annually in accordance with a published trajectory to ensure delivery rates are maintained. A review of policy HS1 will be undertaken jointly by the three Councils no less than every five years to ensure it is up-to-date and meets the requirements of national policy. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional		

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				Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 204, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a		

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				sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward. The Central Lancashire Authorities have drawn on information in the SHELAA to identify a sufficient supply and mix of specific deliverable and developable sites to meet the area's identified housing and employment land requirements. The Housing Trajectories set out in Appendix 3 of the Local Plan demonstrate an additional 8% supply above requirements over the whole plan period. The Central Lancashire Trajectory, in Appendix 3 of the Local Plan, demonstrates that for the first five years of the plan (2026/27 to 2030/31) the total projected completions are 30% above the requirement.		
A51.4	Rep'r Mr Eric Derbyshire Org. Private Individual Agent Mr Daniel Hughes	Policy Site	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Policy HS1 does not align with the requirement to significantly boost housing supply in NPPF. The policy acknowledges the need for new housing but only seeks to meet 80% of the identified housing requirement, which is wholly insufficient. NPPF 62 states that local plans should meet as much housing need as possible. By not planning to fully meet local housing needs, the policy exacerbates affordability issues and limits the economic potential of Central Lancashire. Furthermore, there is no flexibility built into the policy, if existing allocations underdeliver, there is no clear mechanism to release additional sites,	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to tc Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			creating a risk of persistent undersupply. To make Policy HS1 sound, the representor recommends increasing housing allocations to fully meet Local Housing Need (LHN), building in flexibility to release additional sites if needed.	1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for housing within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.		
A52.4	Rep'r Mr Gerald Gornall Org. Private Individual Agent Mr Daniel Hughes	Policy Site	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Insufficient Requirement •Policy HS1 does not align with the requirement to significantly boost housing supply in NPPF. •The policy acknowledges the need for new housing but only seeks to meet 80% of the identified housing requirement, which is wholly insufficient •Policy exacerbates affordability issues and limits the economic potential of Central Lancashire. •No flexibility built into the policy should existing allocations fail to deliver, increasing the risk of housing shortages – there is an over reliance on a limited number of large sites, particularly in	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the	No	Yes

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			Preston and South Ribble, without providing a sufficient contingency.	1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 204, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw		

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						Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward.		
A54.4	Rep'r	Northern Trust	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Policy HS1 does not align with the requirement to significantly boost housing supply in NPPF. The policy acknowledges the need for new housing but only seeks to meet 80% of the identified housing requirement, which is wholly insufficient. NPPF 62 states that local plans should meet as much housing need as possible. By not planning to fully meet local housing needs, the policy exacerbates affordability issues and limits the economic potential of Central Lancashire. Furthermore, there is no flexibility built into the policy, if existing allocations underdeliver, there is no clear mechanism to release additional sites, creating a risk of persistent undersupply. To make Policy HS1 sound, the representor recommends increasing housing allocations to fully meet Local Housing Need (LHN), building in flexibility	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to tc Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a).	No	Yes
	Org.	Northern Trust	Site					
	Agent	Mr Daniel Hughes						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					to release additional sites if needed.	The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for housing within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.		
A55.3	Rep'r Org. Agent	Ms Sophie Eaton Redrow Homes	Policy Site	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	•National Cyber Force HQ and other regional investment initiatives will drive housing demand beyond current projections. •Meeting 80% of need will contribute to housing undersupply and an inability to meet long term demand.	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024).	No	Yes
A60.5	Rep'r Org. Agent	Ms Ashleigh Genco Story Homes Mr Dan Mitchell	Policy Site	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Plan Period is too short •Plan will not cover a full 15-year period post adoption, not in accordance with national policy, period should be extended to 2042 as a minimum. •Requirement should be least 24,944 homes using current 1,314 or 31,597 homes (1,663 dpa x 19 years) based on the latest affordability data. Scale of Housing Growth should be higher - employment forecasts too low, NCF employment not reflected and below standard method & recent	The Plan period is 2023 to 2041. The housing trajectories at Appendix 3 of the Local Plan show that there are three pre adoption years (2023/24 to 2025/26) followed by 15 years (2026/2027 to 2040/41). The approved Local Development Scheme (LDS) 2024 indicates adoption by no later than 31st December 2026, thereby falling within the first year of the year 1-5 period. The Local Plan remains on track against the local plan preparation stages and timings set out in the LDS.	No	Yes

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			delivery levels • Housing Study Update uses 'Employment-led (CR 1-to-1) scenario which draws heavily on employment forecasts from Cambridge Econometrics, this is very pessimistic view of growth - Oxford Economics, show growth of nearly 10,000 more jobs across Central Lancashire between 2023 and 2041. • Both sets of forecasts are trend-based, and so not include major planned projects – the establishment of the National Cyber Force ("NCF") & the A59 'Growth Corridor' stretching from Blackpool to Blackburn, via Preston and taking in Samlesbury Enterprise Zone. • LCC recently consulted on a draft Growth Plan for NCF - Plexal study for LCC suggests NCF will accommodate 2,000 direct & 1,120 indirect jobs - a total of 3,120 additional jobs in CL. • Central Lancashire's economic growth needs will not be met. • The new standard method for Central Lancashire is 1,643 dpa. • Proposed 1,314 dpa requirement has been exceeded in nine out of eleven of the past monitoring years, average past five monitoring years is 2,032 dpa. Perverse Approach, doesn't boost housing supply • Scenario has been added to, to meet minimum figure required by the NPPF2024, to ensure the emerging CLLP meets 80% of the December 2024 standard method LHN requirement (of 1,643 dwellings). • Approach is contrived to benefit from a transitional arrangement, not evidence based and not justified in a plan making	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider		

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			sense, not clear at all how or why that uplift has been distributed to the constituent authorities. •Transitional arrangements being used as a tool to constrain housing requirements. •Current Regulation 19 version of the CLLP should be withdrawn, and a Plan should be prepared in accordance with the NPPF2024. •Latest (March 2025) LHN requirement totals 1,663 dpa (616 dpa in Preston, 492 dpa in South Ribble and 554dpa in Chorley), an increase of 19 dpa against December 2024 LHN •426 dpa (34 per cent) greater than the base requirement identified within the Housing Study Update. •Proposed housing requirement set out at draft Policy HS1, amounts to 79.1 per cent of the area's latest standard method requirement; not the required 80% and, as above, should be withdrawn. •As a very minimum the draft Local Plan, if progressed to submission, should include safeguarded land (removed from the Green Belt) identified for early release by the CLLP Redistribution of Housing Requirement is flawed •Not based on the Housing Study; this is not the case, rationale set out in the Housing Topic Paper - promoting growth in the most sustainable locations but not robust or evidenced, based solely the output of the supply of sites output from the SHELAA •Settlement hierarchy not adequately justified, inconsistent approach	approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward.		

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			undertaken within the SHELAA discounted Green Belt sites from the outset which was, in turn, based on the housing requirement of Chorley already having been redistributed. •No calculation as to how LPA figures have been reached or reapportioned to meet specific housing needs in each of the Boroughs. •Re-distribution of the housing requirement fundamentally relocates development away from where that need is generated. Not enough housing to Chorley •Just 334 dpa distributed to Chorley - 172 dpa lower than the 506 dpa LHN requirement set out under the 2023 Standard Method and 230 dpa lower than 2024 Standard Method requirement. •Overall, 25% shortfall against the latest LHN requirement - most drastic reduction in Chorley of 60% of the latest LHN requirement is proposed to be met. •Will result in insufficient housing delivery, particularly affordable and/or specialist, in Chorley. Too much housing in Preston •Focus on Preston Urban Area as primary focus for growth in Central Lancashire will not provide the appropriate mix of housing that will fully address the area's housing needs. •Family housing needs in suburban areas of Chorley cannot be adequately accommodated by regeneration initiatives in Preston City Centre with dense, flatted accommodation. •Consortium's Housing Supply Report & Viability Study shows that expected delivery in Preston is drastically			

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					overstated with significant viability issues for City Centre sites. Each Authority should meet its own needs •To be positively prepared, vital that each constituent authority should at least meet its own and latest standard method LHN (2024) requirement. •Competition and choice not provided, and area's full housing needs not met •Consortium's housing need assessment demonstrates clear reasons as to why the Central Lancashire Authorities should pursue a higher housing requirement.			
A61.4	Rep'r	Mr Rob Haslam	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	•Central Lancashire is a self-contained functional Housing Market Area (HMA) and is seeking to solely meet its housing requirement in full over the plan period through Policy HS1. •Preston should be the primary focus for development growth and investment due to its city status, existing infrastructure, networks, and connections and the benefits provided through closer links between homes, jobs, and services. •Preston is the largest settlement within Central Lancashire and benefits from extensive transport links and access to extensive provision of health, education, leisure and cultural services and facilities.	Support and reasons for the housing requirement and spatial strategy are welcome.	No	Yes
	Org.	Harworth Estates	Site					
	Agent	Mr Brian O Connor						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A63.7	Rep'r	PWA Planning	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Insufficient Requirement • Policy HS1 does not align with the requirement to significantly boost housing supply in NPPF. • The policy acknowledges the need for new housing but only seeks to meet 80% of the identified housing requirement, which is wholly insufficient • Policy exacerbates affordability issues and limits the economic potential of Central Lancashire. • No flexibility built into the policy should existing allocations fail to deliver, increasing the risk of housing shortages – there is an over reliance on a limited number of large sites, particularly in Preston and South Ribble, without providing a sufficient contingency. Distribution • The strategy employed in Policy HS1 places excessive pressure on a single area, North West Preston and Bartle. There is a danger that there could be delays in delivery if key sites in North West Preston stall and then there is no backup strategy. • There is likely to be a significant under-provision of deliverable sites in Chorley, and a lack of strategic flexibility to meet future demand.	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside	No	Yes
	Org.	PWA Planning	Site					
	Agent	Mr Paul Walton						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward.		
A65.3	Rep'r	Bloor Homes Limited	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Transitional Arrangements •The 1,314 dpa figure has therefore been chosen to meet the 2024 NPPF's 80% transitional arrangements loophole, rather than any other consideration. •This is not in the spirit of the Governments drive to deliver 1.5 million new homes, and does not fulfil the necessary	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning	No	Yes
	Org.	Bloor Homes Limited	Site					
	Agent	Mr Harry Russell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			'exceptional circumstances' case justifying a departure from the previous version of the standard methodology. Alignment of housing need with anticipated job growth • By departing from the SM2 figure of 988 dpa the Councils are acknowledging that exceptional circumstances exist to justify an alternative approach, based on economic growth projections. • The CLLP's housing and employment policies are fundamentally misaligned - DLP has modelled CE job forecasts in its Housing Study Update and BE Group CE forecasts in its Employment Land Study use a completely different projection, based on past take up. • If most of the 173 ha employment land target comes forward for development by 2041 it will undoubtedly accommodate far higher levels of employment than could be sustained by either 1,237 dpa or 1,314 dpa. • The housing evidence of 1,237 dpa is based on a net job growth of 894 p.a., which equates to the Labour Supply employment land scenario - not taken forward by either BE Group or the Central Lancashire authorities. • The Councils' own evidence suggests that the level of employment land growth, at 173 ha, that is 80 ha above the level that could be justified under its Labour Supply scenario of 93.17 ha (which underpins its housing target), and 96 ha greater than the 76.67 ha justified under its Labour Demand scenario. • The 80 ha disparity between the scale of job growth that could be sustained by 1,237 dpa (and, by extension, 1,314 dpa)	Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). Paragraph 4.14 of the Local Plan recognises the need to consider "previous delivery, market trends and signals" when assessing housing need and these factors are considered in the Central Lancashire Housing Study Update, DLP December 2024. The housing requirement in Chorley is stepped over the plan period to take account of low delivery rates in the earlier years of the plan. Delivery is expected to start to increase upon adoption of the plan as new allocations become available for development. The requirement has been stepped from 280 dwellings per annum in the first 3 years of the plan period (2023/24 to 2025/26) increasing to 345 dwellings per annum from 2026/27 onwards i.e. from the point of anticipated adoption.		

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			and the employment land OAN figure of 173 ha is excessive – A higher level of housing growth is needed that is more closely aligned with past trend job growth and employment land ambitions. Equalisation of commuting patterns • The employment-led scenario 1:1 commuting ratio reduces the number of homes required as a whole (from 1,275 dpa to 1,237 dpa) and radically rebalances the distribution of housing need away from Chorley and South Ribble, towards Preston. • By balancing commuting, whilst relying on an employment land target that is far more than the level justified by either the labour demand or labour supply modelling, then the perverse result of actually increasing net in commuting is likely to occur. • Fewer households will be able to live in the three districts and will have to commute in from outside the HMA, resulting in a less sustainable outcome. • It is beyond the gift of the three Councils to ensure that "for every new job created in each district there is a resident worker available to fill it" – the Councils cannot control who moves into the new homes. • Chorley's housing target, 334 dpa, is below the 410 dpa DLP suggests is necessary to have a balanced commuting ratio - this risks increasing commuting from Preston and South Ribble into Chorley to take up work opportunities as the local labour force is artificially constrained. Market signals and previous rates of	As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston,		

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			delivery •Housing requirements are nowhere near the level of housing that have been delivered in recent years, particularly in Preston. •The latest housing delivery figure for the three districts in 2023/24 is recorded •by MHCLG at 2,500 dwellings net (up from 2,418 dwellings the year previously), which is 90% higher than the proposed housing target. •The three Central Lancashire authorities are planning for a very substantial reduction in housing delivery than current trends would suggest is justified. Older and specialist Housing Needs •No adjustment for meeting Older and specialist Housing Needs •The arc4 Housing Demand and Need Assessments identify high levels of need for older persons accommodation, as many as 3,405 additional units of accommodation for older people by 2041 including 2,648 C3 dwellings (sheltered/ leasehold retirement dwellings); 655 C2 Extra Care dwellings; and 103 C2 residential care bedspaces). •Housing Study Update recommends the Councils to consider their needs when determining the housing need for each area. Stepped Requirement for Chorley •Backloading the housing requirement to the later years of the plan period is the antithesis of being positively prepared and boosting supply. Redistributing housing need away from Chorley towards Preston •Not an appropriate approach.	supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward.		

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			• Suppressing housing targets in the most desirable residential area of Central Lancashire whilst also backloading its delivery will inevitably lead to higher house prices in Chorley, worsening affordability yet further. Bringing empty homes back into use • Adjustments to vacancy rates reduce the amount of new dwellings required as vacant homes are brought back into productive use. • If Edge Analytics' vacancy rates assumptions have been used these artificially reduce the level of housing need, by 1,386 dwellings overall (944 in Preston).			
A67.4	Rep'r L&Q Org. L&Q Agent Mr Phil Robinson	Policy Site	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Plan Period • Given the remaining Plan preparation stages and lead in times the Plan period should be extended until at least 2042 to ensure that the Plan covers 15 years on adoption. Transitional Arrangements • The proposed housing requirement meets only 79% of the minimum Local Housing Need, transitional arrangements not engaged. • Transitional arrangements should not be used as a way to reduce the housing • requirement in Central Lancashire. • The 77-dwelling addition to the employment led housing figure is largely arbitrary, simply trying to meet 80% of the LHN figure, which in any case it fails to achieve.	The Plan period is 2023 to 2041. The housing trajectories at Appendix 3 of the Local Plan show that there are three pre adoption years (2023/24 to 2025/26) followed by 15 years (2026/2027 to 2040/41). The approved Local Development Scheme (LDS) 2024 indicates adoption by no later than 31st December 2026, thereby falling within the first year of the year 1-5 period. The Local Plan remains on track against the local plan preparation stages and timings set out in the LDS. The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a).		
A68.1	Rep'r	Wain Homes North West	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Plan Period is too short - Proposed period is 2023 to 2041- based on the Council's own LDS, the period will be 14 years 3 months after adoption and not cover 15 years - As a minimum should extend to 2042 but based on experience elsewhere Examinations can take much longer, not sound Use of the transitional arrangements/overall requirement - Accept basis of meeting 80% of the standard method which is 1,314 dwellings - Part of the consortium instructed Stantec to prepare a Housing Needs Assessment for CL – not sound, should be revised to meet at least the standard method of 1,643 dpa - Authorities have fallen into error due to the increase of 77 dpa to meet the transitional arrangements - Increase is not evidence based and is	The Plan period is 2023 to 2041. The housing trajectories at Appendix 3 of the Local Plan show that there are three pre adoption years (2023/24 to 2025/26) followed by 15 years (2026/2027 to 2040/41). The approved Local Development Scheme (LDS) 2024 indicates adoption by no later than 31st December 2026, thereby falling within the first year of the year 1-5 period. The Local Plan remains on track against the local plan preparation stages and timings set out in the LDS. The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning	No	Yes
	Org.	Wain Homes North West	Site					
	Agent	Stephen Harris						

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			simply a mathematical calculation to meet the transitional arrangements, does not fall within the scope of the PPG circumstances - Paragraph 2a-010 - PPG list is not exhaustive, but any increase should be evidence based and for that reason the plan is not sound and therefore cannot be considered under the 2023 Framework. - Under the standard method the total requirement would be 29,574 dwellings - 5,922 dwellings not being planned for - Authorities have added 77 dwellings to the annual requirement to avoid the need to plan for an additional 329 dpa – arbitrary, not sound - Not on the public record of when it was agreed that additional 77 homes would be applied - Not 80%, shortfall of 7 dwellings. Below recent delivery levels - The 10 year delivery average is 1,650dpa and the 5 year average is 1,920dpa - No provision in the Plan for an early review, 20% increase between the requirement in HS1 and the standard method is a significant change which justifies an early review Distribution of Housing Requirements - Sole reason that the change in distribution is so that Green Belt release in Chorley was not required paragraph	Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). Each Council will monitor delivery rates within their area annually in accordance with a published trajectory to ensure delivery rates are maintained. A review of policy HS1 will be undertaken jointly by the three Councils no less than every five years to ensure it is up-to-date and meets the requirements of national policy. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 204, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables		

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			5.2 of Housing and Employment Allocations: Site Selection Process (HO16) states: “5.2 Chorley had unmet need against the housing requirement set out in the Housing Study however Preston and South Ribble were able to meet this unmet need therefore a redistribution of the Housing Study requirements was applied. As such Green Belt release in Chorley was not required and could not be justified.” - Reduction applied to Chorley and the increase to South Ribble should be altered so that the outcome of the Central Lancashire Housing Study is applied.	existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward.		

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A70.1	Rep'r	Mr Farrington	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	• The growth and ambition proposed within the draft Local Plan is quite clearly the absolute minimum that the Council needs to provide to be policy compliant. • The requirement in HS1 has been rushed through to avoid having to provide the full housing allowance in accordance with the new Standard Methodology.	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a).	No	Yes
	Org.	Trustees of the Worden Estate	Site					
	Agent	Mr Andy McMullan						
B15.1	Rep'r	Mr Neil Smith	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	No justification as to why Chorley's 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.	As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 2024, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider	No	Yes
	Org.	Private Individual	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to unlock these sites coming forward later than envisaged. As a result, there remains a considerable supply of sites identified in the extant plans as part of the City Deal. In contrast, in Chorley, the bulk of housing delivery between 2012-2020 has taken place at Buckshaw Village, with delivery achieved quicker than expected. As Buckshaw Village has been built out, the focus of housing delivery over recent years has shifted away from Chorley towards Preston, supported by investment in infrastructure improvements. An overall redistribution of need has been identified as appropriate to support a sustainable pattern of development, to ensure that delivery of new sites conforms with the spatial strategy and to enable existing commitments to come forward. The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a).		
B51	Rep'r	Mr Neil McManus (Northern Trust & Lanley Homes)	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	The housing need being planned for does not comply with the NPPF requirements to provide 80% of the standard method figures. The representor submits a Central Lancashire Housing Land Supply Assessment and a Central Lancashire Need Assessment prepared by Stantec. These documents have been prepared on behalf of a consortium of interested parties. The documents seek to demonstrate that policy HS1 does not identify sufficient land for housing growth.	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a).	No	No
	Org.	Northern Trust and Lanley Homes	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B65.3	Rep'r	Messrs Rankin, Patel and Briggs	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Insufficient Housing in Preston •The plan fails to provide sufficient land for housing development, particularly in respect to Preston. •Policy HS1 should be amended to increase the housing requirement for Preston to meet the required 80% of that identified in the new standard method. •As such the plan should allocate additional land in Preston to address the shortfall. Conflict with Transitional Arrangements •Failure to provide sufficient land for housing is in direct conflict with the new Standard Method for the calculation of housing requirements established through the National Planning Policy Framework [NPPF][December 2024]. •The overall housing land identified does not meet 80% of the local housing need established in December 2024 and is therefore in conflict	Policy HS1 sets out the overall scale of housing required, the number of homes that will provide net additional dwellings over the plan period, and how this is distributed across the three component Council areas. No further supply is required. The Central Lancashire Authorities have drawn on information in the SHELAA to identify a sufficient supply and mix of specific deliverable and developable sites to meet the area's identified housing and employment land requirements. As confirmed by the Housing Study Update, Central Lancashire is a longstanding self-contained functional Housing Market Area (HMA). A redistribution of the three identified housing requirements from the Housing Study Update, December 204, has been applied in Policy HS1 to reflect the Local Plan's spatial strategy drivers (Policies SS1 and SS2), including the settlement hierarchy. This approach promotes housing and related growth in the most sustainable locations and enables existing commitments to come forward. The reuse of brownfield land and town and city regeneration are key priorities. This is framed within a wider approach of restricting development in the Green Belt and open countryside and enhancing and protecting landscape and settlement character, including Areas of Separation. The delivery of the City Deal in Preston and South Ribble has also been considered. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of essential infrastructure required to	No	Yes
	Org.	Private Individual	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						unlock these sites coming forward later than envisaged. The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243.		
D01.1	Rep'r	Eddie Graves	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Housing Requirement & Transitional Arrangements • No concerns with the approach taken to the calculation of housing need & the requirement. Housing Supply • There is an almost a 9,000 home shortfall in the housing supply to deliver HS1. • Trajectories set out in the appendices show that the shortfall is made up by existing commitments (6,499) and windfall allowances (3,139, of which none are in Preston) but no explanation or justification appears to be provided for these in the plan. • Fylde Council seeks clarification and confirmation in writing within the plan that Central Lancashire will meet its own needs over the full period of the plan.	Paragraph 4.1 of the Local Plan confirms that "The area is seeking to solely meet its housing requirement in full over the plan period".	No	Yes
	Org.	Fylde Council	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D03.5	Rep'r	Helen Holland	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	Full Housing Needs not met • Plan does not meet the varied and significant full housing needs of the area, there will be an under- supply of land for new homes. • The employment-led scenario used in the Housing Land Study Update of December 2024 were effectively superseded by the revised standard method also published during the same month. • The Plan's evidence base does not adequately demonstrate that even the lower housing requirement figure of 23,652 dwellings can be delivered over the Plan period. Transitional Arrangements • Taking account of the latest affordability ratios published in March 2025) over the Plan period – and if the Plan period is extended to 2042 the Plan is only providing for 75% of need. • There is no evidence to justify seeking 80% of need. Green Belt Review is Needed • Given the scale of housing needs and the absence of sufficient available urban or previously developed land, exceptional circumstances exist whereby it is necessary to release Green Belt land. Economic Growth Projects not accounted for • Policy HS1 pays inadequate regard to the fundamentally important role within the cyber corridor played by the high value economic cluster comprising the Samlesbury Enterprise Zone and Innovation Hub and the adjoining BAE Systems site. Employment Forecasts	The identified housing supply is sufficient to meet the transitional arrangements set out in the NPPF (December 2024) given that the plan reached the Regulation 19 (pre-submission stage) before 12 March 2025. Following publication of the new NPPF in December 2024, and subsequent updates to the Planning Practice Guidance on the new standard method to assess housing needs, the councils assessed how the Local Plan meets the Transitional Arrangements set out in paragraphs 234-243. The arrangements require the councils to deliver an additional 77dpa above the 1,237 the councils had been working towards to ensure that the councils meet at least 80% of the local housing need as set out in NPPF paragraph 243 (a). The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for housing within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated. The Plan period is 2023 to 2041. The housing trajectories at Appendix 3 of the Local Plan show that there are three	No	Yes
	Org.	Blackburn with Darwen Borough Council	Site					
	Agent							

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					•Housing requirement figure is flawed in its use of the Cambridge Econometrics total jobs growth forecast of 16,660 jobs - Oxford Economics forecast 26,550 additional jobs. •Both forecasts do not include jobs growth associated with specific projects in the Plan area, such as the proposed location of the National Cyber Force HQ as reflected in the Lancashire Growth Plan. Plan Period •Plan period should be extended to 2042.	pre adoption years (2023/24 to 2025/26) followed by 15 years (2026/2027 to 2040/41). The approved Local Development Scheme (LDS) 2024 indicates adoption by no later than 31st December 2026, thereby falling within the first year of the year 1-5 period. The Local Plan remains on track against the local plan preparation stages and timings set out in the LDS.		
D16.09	Rep'r	Mrs Lindsay Alder	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	National Highways notes that the Local Plan identifies significant and ambitious areas of housing growth during the Plan period. National Highways will work with Central Lancashire to achieve these goals.	The willingness for collaborative working is noted and supported.	No	Yes
	Org.	National Highways	Site					
	Agent							
D21.01	Rep'r	Mrs Glenys Southworth	Policy	Policy HS1 (Strategic Policy): Scale of housing growth and distribution of housing requirements	•Any proposed housing development should follow the principles in the Design Code and the Housing Needs Assessment (which were prepared as part of the emerging Bretherton Neighbourhood Plan process which is currently at its second consultation phase) •The Design Code and Housing Needs Assessment set out to preserve and enhance the character, heritage and sustainability of the village, surrounding landscapes, wildlife and biodiversity. •Other comments relate to site 7.	•The Local Plan is informed by evidence base studies prepared for the overall Central Lancashire area and the three component local planning authority areas. •The Central Lancashire Housing Study Update, DLP December 2024, informs Policy HS1 with a focus on the level and proportional distribution of future housing needs amongst the three local planning authorities. •A Housing Need and Demand Assessment (HNDA) was prepared for	No	Yes
	Org.	Bretherton Parish Council	Site					
	Agent							

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				each of the Central Lancashire authorities in 2024, which provide the Councils with up-to-date evidence on housing need across all sections of the community over the period 2023 to 2041. The assessments have provided the evidence base for Local Plan Policy HS6: Housing Mix and Density, addressing the need for local planning authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect these needs in planning policies. • The HNDAs helped to determine an appropriate mix of dwellings across each borough and break down needs in a consistent way within the individual local authorities by settlement/parish for open market, affordable home ownership and affordable/ social rented dwellings.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HS2: Housing Allocations Chorley				Count of Representations against this policy/section:		54
A10	Rep'r: Adlington Land Limited Org.: Adlington Land LTD Agent: Mrs Louise Leyland	Policy: Policy HS2: Housing Allocations Chorley Site: HS2.5	Support the allocation. The site occupies a highly sustainable location and is available and deliverable. The site has been subject to two live planning applications which have demonstrated there are no technical or environmental reasons which would preclude the site coming forward for housing development.	Support noted.	No	Yes
A24.4	Rep'r: Mrs Joanne Harding Org.: Home Builders Federation Agent:	Policy: Policy HS2: Housing Allocations Chorley Site: No specific site	The Plan should provide for a wide range of deliverable and developable sites across the Borough in order to provide competition and choice to ensure that housing needs are met in full. The HBF also notes that the NPPF requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. Securing an implementable planning permission is extremely difficult if small sites are not allocated. The HBF would therefore wish to see the 10% small sites allowance delivered through allocations (and not windfall). The HBF also notes that support for small and medium builders need not be limited to only small sites of less than 1Ha. SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of additional non-strategic allocations would expand the range of choice in the market, and (possibly most importantly),	Policy HS2 allocates a wide range of deliverable and developable sites across Chorley Borough. Policy HS2 allocates 228 dwellings on sites of no greater than 1ha. Policy EC5 also allocates 10 dwellings on mixed use sites where the housing element in less than 1ha. This is a total of 238 dwellings which equates to 4% of the total housing requirement for Chorley. The SHELAA considered sites of all sizes therefore all sites suggested to the Council of no more than 1ha were considered for allocation. Those considered suitable, available and achievable and conformed with the spatial strategy were allocated. Overall the plan includes a housing supply that is greater than the requirement. Housing supply is made up of the housing and mixed use allocations, extant planning permissions and completions in the plan period, as set out in the housing trajectories.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			be of a scale that can come forward and make a contribution to housing numbers earlier in the plan period. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and to provide flexibility and choice within the market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared.			
A26.13	Rep'r: Miss Georgina Cox Org.: Gladman Developments Agent:	Policy: Policy HS2: Housing Allocations Chorley Site: HS2.16	In principle, Gladman support the allocation. We consider 332 dwellings to be overly cautious as there are limited development constraints. It is unclear how it has been determined and Gladman contend that it is appropriate for an increased housing density. There is no logic for a new primary school.	HS2.16 allocates 332 dwellings on 13.87ha of land. This site area excludes the primary school allocation. It is proposed that the primary school will be developed on the part of the site that is owned by Chorley Council. This allocation has been carried forward from the existing Chorley Local Plan in liaison with Lancashire County Council who are the education authority. 7.9ha of the housing allocation is owned by the Council. 171 dwellings are proposed on this land. This is based on plans drawn up by the Council in 2024. The remainder of the allocation not owned by the Council is 5.97ha. A density of 27dph has been applied to this part of the site which results in 161 dwellings. This is in line with the minimum density requirement in Policy HS6. It is accepted that this is a	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						minimum density requirement and a greater density may be appropriate. The allocation does not preclude a proposal coming forward for a development with a greater density provided it meets the requirements of Policy HS6.		
A29.1	Rep'r Org. Agent	Northern Trust Northern Trust Mr Matthew Dawb	Policy Site	Policy HS2: Housing Allocations Chorley HS2.34	Based on the evidence available the proposed allocation is sound in relation to the tests set out in NPPF. No insurmountable constraints have been identified that cannot be managed through the planning application process.	Comments noted.	No	No
A29.2	Rep'r Org. Agent	Northern Trust Northern Trust Mr Matthew Dawb	Policy Site	Policy HS2: Housing Allocations Chorley HS2.37	Based on the evidence available the proposed allocation is sound in relation to the tests set out in NPPF.	Comments noted.	No	No
A32.3	Rep'r Org. Agent	Mr Stephen Glenn Northern Trust Land Ltd Mr Alexis De Pol	Policy Site	Policy HS2: Housing Allocations Chorley	Submitted on behalf of Northern Trust, to be read alongside Stantec's 'Housing Land Supply Assessment' dated April 2025. Supplement 1 It is considered there are insufficient housing allocations in Policies HS2-HS4, the housing allocations do not reflect sustainability objectives and there are suitable alternatives for allocation. The claimed deliverable housing land supply is exaggerated and overestimated as there is an unrealistic reliance on large windfall sites coming forward, reliance	Separate proformas have been prepared for the representations in relation to HS2.10 (A32.9) and the four omission sites (A32.10-A32.13) The Council considers that the supply and deliverability information in relation to all housing allocations and committed sites is justified and based on robust evidence. The sites have been assessed in detail as part of the SHELAA and site promoters have been contacted to gather information on the availability of sites and their proposed timescales for development. An updated trajectory and five year supply position with a base date of 1st April 2025 will be published	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			on historic site allocations which have been carried forward despite little evidence that the constraints that previously prevented them coming forward have been overcome, and sites which do not meet the NPPF test of deliverability being relied upon to demonstrate a deliverable supply for the first five years of the plan. HS2.10 – part of the original draft allocation has been excluded, it is not located in the Green Belt and there are no insurmountable constraints. Representations submitted for four suitable sites in the Green Belt that were previously submitted at Regulation 18 but not allocated. The proposed distribution of housing allocations has been unduly influenced by what sites are available outside of the Green Belt rather than an overarching strategy with little account of whether they represent the right level of growth for a settlement in accordance with the hierarchy and sustainability objectives. Supplement 2 Further information is provided in a Housing Land Assessment which suggests that 12 housing and mixed use allocations should be removed (EC5.2, EC5.4, EC5.5, HS2.5, HS2.7, HS2.9, HS2.19, HS2.21, HS2.22, HS2.28, HS2.31, HS2.36) as they are not considered deliverable. This would lead to a reduction of 561 dwellings.	for Chorley in due course. Historic allocations have only been rolled forward where there is evidence that they are suitable, available, and achievable. The large windfall allowance for Chorley is based on evidence. The methodology is set out in the SHELAA. There is clear evidence that large windfall sites have consistently contributed to the housing supply over the last 15 years and there is no evidence to suggest that this will not continue. The large windfall allowance calculation is based on the median completions in the last 15 years to take account of any fluctuations. In line with NPPF paragraphs 110, 115 and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. The settlement hierarchy has also been used to guide development to the most appropriate locations. NPPF requires exceptional circumstances to be demonstrated to release land from the Green Belt. In accordance with this the Councils have explored all reasonable options outside of the Green Belt and Chorley's unmet need has been redistributed to Preston and South Ribble. As the housing need can be met in locations outside of the		

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			Sites with planning permission for 50+ dwellings have been assessed to ascertain their likelihood of delivery. All sites were retained in the supply but amendments have been made to the trajectory with a greater number of dwellings anticipated to come forward in the pre-adoption period. Concerns over the large windfall allowance. There is no guarantee that market conditions, land availability or planning constraints will allow large windfall sites to come forward at the assumed rate. With an up to date plan in place, one should expect fewer houses delivered by windfall development. Therefore there should be no allowance for large windfall sites. Based on the above Chorley will not have a 5 year supply at the point of adoption.	Green Belt, exceptional circumstances for Green Belt release cannot be demonstrated.		
A32.9	Rep'r Mr Stephen Glenn Org. Northern Trust Land Ltd Agent Mr Alexis De Pol	Policy Policy HS2: Housing Allocations Chorley Site HS2.10	The allocation has been reduced in size from the preferred options allocation. The land excluded is not in the Green Belt and there are no unsurmountable technical constraints to its development. The SHELAA states that it has been reduced to avoid significant impact on the landscape character. A Landscape Statement has been prepared relating to the land that has been removed. It highlights that the LUC Open Land Designations Study published in 2022	The site was reduced in size in main due to the appeal decision for planning application 21/00254/OUTMAJ which was dismissed due to the impact the development would have on landscape character. The part of the allocation removed is directly adjacent to the appeal site. The boundary has been amended so that the allocation does not extend beyond Paradise Street where it would be surrounded by development on all sides. Beyond Paradise Street the	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					identifies the site as 'above ordinary' and therefore within 'ordinary' landscape areas. It identifies that development would result in permanent changes to the landscape however the impact on the landscape character would be limited to the site and its immediate surroundings. A Landscape and Visual Assessment prepared for a planning application on the site (21/00254/OUTMAJ) concluded that it is of medium landscape value. It is acknowledged that this application was refused on appeal where landscape impact was the only reason for refusal. The application site was viewed in isolation and not part of the wider preferred options proposed allocation.	land is more open to the east and west and it would therefore have an impact on the landscape character. The allocation is located in an area currently designated as 'Area of Other Open Countryside' in the Chorley Local Plan which is protected from unacceptable development that would harm its open and rural character. As this land is not Green Belt, sites suggested as part of the Central Lancashire Local Plan in this area have been considered through the SHELAA but land has only been allocated and removed from the countryside designation where there would not be a significant impact on landscape and rural character. The sites allocated form a logical extension to the Chorley settlement boundary.		
A38.1	Rep'r	Taylor Wimpey UK Limited	Policy	Policy HS2: Housing Allocations Chorley	Taylor Wimpey support this allocation. It has no constraints that would prevent development coming forward.	Support noted.	No	Yes
	Org.	Taylor Wimpey UK Limited	Site	HS2.26				
	Agent	Ms Alexandra Gavi						
A39.1	Rep'r	Castle Green Homes	Policy	Policy HS2: Housing Allocations Chorley	Overall, Castle Green fully supports the proposed allocation of the Little Knowley site HS2.10. However, Castle Green do note that the proposed allocation does not fully reflect the evidence base, and the assessments undertaken for parcel Ref: 19C393a. The evidence clearly	The conclusion in the SHELAA refers to the reduced site area that has been allocated. The site was reduced in size in main due to the appeal decision for planning application 21/00254/OUTMAJ which was dismissed due to the impact the development would have on	No	Yes
	Org.	Castle Green Homes	Site	HS2.10				
	Agent	Mrs Kerry Walker						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			assesses a much larger parcel and the conclusion within the SHELAA at Appendix 4: suitable, available and achievable sites, confirms that parcel Ref: 19C393a [i.e. the entire parcel], should be a proposed allocation ref: HS2.10.	landscape character. The part of the allocation removed is directly adjacent to the appeal site. The boundary has been amended so that the allocation does not extend beyond Paradise Street where it would be surrounded by development on all sides. Beyond Paradise Street the land is more open to the east and west and it would therefore have an impact on the landscape character. The allocation is located in an area currently designated as 'Area of Other Open Countryside' in the Chorley Local Plan which is protected from unacceptable development that would harm its open and rural character. As this land is not Green Belt, sites suggested as part of the Central Lancashire Local Plan in this area have been considered through the SHELAA but land has only been allocated and removed from the countryside designation where there would not be a significant impact on landscape and rural character. The sites allocated form a logical extension to the Chorley settlement boundary.		
A50.2	Rep'r: Mr Christian Orr Org.: Hollins Strategic Land Agent:	Policy: Policy HS2: Housing Allocations Chorley Site: No specific site	We have concerns that all of the allocations set out in Policy HS2 have been properly assessed by sufficient evidence in terms of deliverability to meet the definition set out in NPPF. For example, Policy HS2.1 is allocated for 92 dwellings. Our assessment of this site is that there are significant access	The Council's evidence base (including the SHELAA, SFRAs, and Site Selection Process) detail how all of the allocation sites have been assessed and identified. In addition, a site promoter survey was undertaken to obtain information from site promoters on the deliverability of their sites and anticipated timescales for development. The Council believes all	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					constraints to obtaining the level of housing sought by the allocation. It is therefore unclear whether the promoters of the site have demonstrated that an access is achievable nor whether the LPA have considered this properly to be able to propose the site for allocation. In addition, the SHELAA confirmed the site is at risk from reservoir flooding and there is significant risk from surface water in the longer term. Access into the site would cross land at risk of flood. PPG requires that sites such as this will be required to undertake a sequential test. It is unclear whether the LPA have undertaken a sequential test to determine whether all of the allocations are at lowest risk of flooding or that suitable alternatives have been considered.	the allocations to be deliverable (suitable, achievable, available). The SHELAA sets out the detailed assessment of HS2.1. It identifies that all constraints are likely to be able to be mitigated.		
A55.7	Rep'r	Ms Sophie Eaton	Policy	Policy HS2: Housing Allocations Chorley	Redrow supports the HBF's call for a sufficient buffer in housing land supply to prevent shortfalls. A surplus of allocated sites would allow for flexibility in the market, ensure delivery against the Housing Delivery Test, and maintenance of a five-year supply. The plan should include a broad range of sites. Site selection has been flawed, hastily withdrawing existing Local Plan designations to push through the Regulation 19 Local Plan. This lacks flexibility in supply and disregards development opportunities, resulting in an unsound strategy.	The Council's evidence base explains how the housing requirements have been calculated, and how the proposed allocation sites have been assessed and identified. Any existing Local Plan designations which have been removed as allocations are on the basis that evidence no longer demonstrates that they are deliverable. These sites are already excluded from the Council's five-year supply forecasts.	No	Yes
	Org.	Redrow Homes	Site					
	Agent							

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A60.21	Rep'r	Ms Ashleigh Genco	Policy	Policy HS2: Housing Allocations Chorley	The proposed allocation is sound in relation to the tests set out in NPPF. No insurmountable constraints have been identified for the site that cannot be managed through the planning application process.	Comments noted.	No	Yes
	Org.	Story Homes	Site	HS2.34				
	Agent	Mr Dan Mitchell						
A60.22	Rep'r	Ms Ashleigh Genco	Policy	Policy HS2: Housing Allocations Chorley	The proposed allocation is sound in relation to the tests set out in NPPF. No constraints have been identified for the site.	Comments noted.	No	Yes
	Org.	Story Homes	Site	HS2.37				
	Agent	Mr Dan Mitchell						
A62.1	Rep'r	Lilford (2005) Ltd	Policy	Policy HS2: Housing Allocations Chorley	The Lilford Estate supports the proposed allocation of the land. An outline planning application is currently being prepared. Agree with the conclusions for this site in the SHELAA. It will support the long term sustainability of the village. There are no significant constraints which would undermine the development of the site. It is well contained by existing development with a frontage to South Road, facilitating access to the site. The site is suitable, available and achievable. A Development Framework has been submitted alongside the representation.	Support noted.	No	Yes
	Org.	Lilford (2005) Ltd	Site	HS2.6				
	Agent	Mr Andrew Bickerd						
A65.4	Rep'r	Bloor Homes Limited	Policy	Policy HS2: Housing Allocations Chorley	A previous planning application was dismissed at appeal owing to flood risk issues, therefore the site is not in a suitable location for residential development. The site does not meet the definition of developable as set out in the NPPF and should be removed as an	The previous planning application was dismissed at appeal as a sequential flood risk assessment had not been submitted. A new planning application has been submitted which removes the area of flood risk from the developable area, no objections relating to flood risk	No	Yes
	Org.	Bloor Homes Limited	Site	HS2.5				
	Agent	Mr Harry Russell						

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			allocation from the CLLP.	have been received from the Environment Agency or Lead Local Flood Authority. The Council commissioned a flood risk assessment of the site which identified some matters that needed to be addressed but did not identify any significant flood risk issues that could not be mitigated.		
A65.8	Rep'r Bloor Homes Limited Org. Bloor Homes Limited Agent Mr Harry Russell	Policy Policy HS2: Housing Allocations Chorley Site HS2.10	An application for outline planning permission (ref. 22/00538/OUTMAJ) for the erection of up to 200 dwellings on the site was withdrawn by the applicant (Castle Green Homes) on 14 February 2024. On land adjacent to the site, an application for outline planning permission (21/00253/OUTMAJ) for the erection of up to 130 dwellings was dismissed at appeal on 1 December 2023. The Inspector concluded that the proposal would result in considerable harm to the character and appearance of the area. The draft allocation, as an adjacent site, is subject to similar landscape constraints. A Public Right of Way which runs through the site means that it would be particularly sensitive to landscape harm arising from residential development. The draft allocation is considered to be inappropriate for residential development by virtue of the landscape harm that would arise. It is therefore not in a suitable location for housing development and as such does not meet the definition of developable as set out in the NPPF. The claimed supply of 150 dwellings appears to be derived from the withdrawn application. The draft allocation includes approximately	The area of this allocation has been significantly reduced from the allocation proposed at preferred options in light of the appeal decision on the adjacent site. The part proposed for allocation is surrounded by development on all sides and therefore would not have a significant impact on landscape character. The part removed from the preferred options allocation lies directly adjacent to the appeal site and it is agreed that development on this land would have an impact on landscape character.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					half of the withdrawn application site. The capacity of the site is therefore more likely to be 100 dwellings than the stated 150 dwellings.			
A65.9	Rep'r Org. Agent	Bloor Homes Limited Bloor Homes Limited Mr Harry Russell	Policy Site	Policy HS2: Housing Allocations Chorley HS2.11	Appendix 4 states that a Heritage Impact Assessment has been prepared which identifies that development on the site would have a "significant impact on the setting" of the Grade II Listed Botany Bay Mill and non-designated Knowley Farm. On that basis, the site is not considered to be a suitable allocation for residential development in accordance with the requirements of the NPPF. All 246 units in the CLLP's supply should therefore be removed and reallocated to preferential sites which would not have a significant impact on the setting of a nearby heritage asset.	The Heritage Impact Assessment concludes that the proposed mitigation measures will result in a negligible impact on the heritage asset. The mitigation measures include protect and retain TPO trees on the site boundary and hedgerows, provide buffer planting to the site edges, railway line and canal, retain a buffer to the canal side for biodiversity and amenity and set the new development back from the assets. Historic England were involved in the preparation of the Heritage Impact Assessments.	No	Yes
A65.10	Rep'r Org. Agent	Bloor Homes Limited Bloor Homes Limited Mr Harry Russell	Policy Site	Policy HS2: Housing Allocations Chorley HS2.34	There are significant concerns associated with access arrangements to the site which have led us to conclude that the site is not in a suitable location for residential development. It therefore does not meet the definition of developable and all 55 units should be removed from the CLLP's claimed supply. The site also has a challenging topography.	A planning application is currently under consideration on the adjacent allocation (HS2.37) for residential development. The applicant is liaising with Lancashire County Highways as part of the application process to seek to agree a suitable access. The access would also serve this site. The yield of the site has been reduced to take account of the challenging topography.	No	Yes
A65.11	Rep'r Org.	Bloor Homes Limited Bloor Homes Limited	Policy Site	Policy HS2: Housing Allocations Chorley HS2.36	There are several constraints associated with this draft allocation, including challenging topography, risk of contamination, unsuitable access	The assessment of this site is included in the SHELAA. The site is considered deliverable. Lancashire County Council Highways raised no objections in	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent	Mr Harry Russell			arrangements and the potential for landscape harm. For a myriad of reasons, the issues with this draft allocation represent a considerable constraint to residential development. The site is therefore not considered to be in a suitable location for development and as such does not meet the definition of developable as set out in the NPPF. Accordingly, all 102 dwellings should be removed from the CLLP's supply.	relation to securing a suitable access. Access will be determined at the planning application stage. It is not considered that the topography will significantly reduce the yield. The Environment Agency have not objected to the allocation as there is no evidence of contamination on the site, instead they have advised that ground testing would be needed as part of any planning application.		
A65.12	Rep'r	Bloor Homes Limited	Policy	Policy HS2: Housing Allocations Chorley	There are significant concerns associated with access arrangements to the site which have led us to conclude that the site is not in a suitable location for residential development. It therefore does not meet the definition of developable and all 75 units should be removed from the CLLP's claimed supply.	A planning application is currently under consideration on this site for residential development. The applicant is liaising with Lancashire County Highways as part of the application process to seek to agree a suitable access.	No	Yes
	Org.	Bloor Homes Limited	Site	HS2.37				
	Agent	Mr Harry Russell						
A68.2	Rep'r	Wain Homes North West	Policy	Policy HS2: Housing Allocations Chorley	Our client owns part of the allocation. Our client's site in isolation has detailed planning consent for the erection of 70 no. dwellings. Construction work on this scheme will commence as soon as the pending Section 73 application is determined, and the pre-development conditions have been discharged.	Comments noted.	No	Yes
	Org.	Wain Homes North West	Site	HS2.16				
	Agent	Stephen Harris						
B01	Rep'r	Mrs K Pimlott	Policy	Policy HS2: Housing Allocations Chorley	There has already been the orchard meadow development (23 houses) currently under construction and the 12no apartment developments at Bank Hall - completed in 2021. Both located at Bank Hall Lane, Bretherton. Reconsider this allocation.	The representation states it is in regard to site HS2.2 but it is assumed this is incorrect and is regarding site HS2.6 which is the only housing allocation in Bretherton. The permitted developments at Bank Hall have no relevance to this allocation. Bank Hall is	No	No
	Org.	Private Individual	Site	HS2.6				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						located some distance away from this allocation.		
B03	Rep'r	Mr Mark Hague	Policy	Policy HS2: Housing Allocations Chorley	This proposal fails to demonstrate how it will meet local housing needs without causing significant harm to existing residents. It does not provide adequate infrastructure provisions for the additional strain on roads, schools, healthcare, and public transport. Lacks a clear plan for mitigating the loss of green space and biodiversity. There has been insufficient assessment of alternative sites that may be more suitable for development. The environmental impact assessments fail to adequately consider the loss of wildlife habitats, flood risk, and increased noise pollution for existing residents. No sufficient justification has been provided for selecting this site over others that could have less impact on existing communities. The site should be removed.	The SHELAA sets out the process for selecting allocations and the detailed assessment of this site. It is an existing housing allocation that has been carried forward. It is not designated as green space. This is the only allocation proposed in Brinscall and is allocated for 12 dwellings. It will therefore have minimal impact on existing infrastructure.	No	Yes
	Org.	Private Individual	Site	HS2.7				
	Agent							
B20.1	Rep'r	Mrs Barbara Farbon	Policy	Policy HS2: Housing Allocations Chorley	I consider that the plan is seeking to be compliant and I would support the actions of the planners in this. I hope that we will see improvements in infrastructure to support these ends. In terms of making the Plan sound there must be plans for school building, investment in transport, health provision and leisure facilities otherwise the plan will not work. With every house comes two or three cars, there must be provision for off road parking which is proportional to the number of beds in the house and if this is not possible then	The Councils are working with Lancashire County Council who are the education authority to ensure the Local Plan provides sufficient school provision. A Transport Strategy has been prepared which identifies transport improvements needed to support the proposed development. The Infrastructure Delivery Plan sets out these improvements. The Councils have consulted with the relevant health bodies to ensure they	No	Yes
	Org.	Private Individual	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					an efficient service should be available to link with other forms of transport and this service should be reliable enough to attract people away from driving on the already overcrowded roads.	plan for the increase in population that the development will generate. The Local Plan protects existing open space and leisure provision and supports new provision. The Local Plan includes parking standards for new development and includes policies that support sustainable and active travel.		
B20.2	Rep'r Org. Agent	Mrs Barbara Farbon Private Individual	Policy Site	Policy HS2: Housing Allocations Chorley HS2.6	The document references national and local policy and planning frameworks.	No specific comments in relation to this allocation have been provided. The representation states it is in relation to a site not proposed for allocation - 19C233x, however this site has been allocated as HS2.6.	No	Yes
B21	Rep'r Org. Agent	Mr Paul Blackmore Private Individual	Policy Site	Policy HS2: Housing Allocations Chorley HS2.36	There is no vehicular access to this site without going over private land. Therefore it is clearly unsuitable for inclusion in any local plan. The site is very steep, and access to the main road network in any case is unviable and undeliverable. There is no public transport anywhere close, and the nearest bus service is irregular. Local parking and road issues need to be resolved in advance of any decision i.e. Chorley Old Road and parts of Town Lane are effectively one way streets due to parking issues. The highways department failed to cooperate and meet on site to view/discuss access arrangements on surrounding roads. This site is undeliverable and should be removed.	The assessment of this site is included in the SHELAA. The site is considered deliverable. Lancashire County Council Highways raised no objections in relation to securing a suitable access. Access will be determined at the planning application stage. It is not considered that the topography will significantly reduce the yield. Nevertheless, the allocation does not preclude a lower number of dwellings coming forward in line with Policy HS6 if site specific considerations justify it.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B26.1	Rep'r	Mr William Taylor	Policy	Policy HS2: Housing Allocations Chorley	This site relies on Birchin Lane / Hilltop Lane to access Chorley Old Road. None of these roads are suitable to the increase in traffic that would be implied by the development of this site or the adjacent proposed site. Birchin Lane, for the last 180m towards its junction with Chorley Old Road is very narrow and constricted by parked cars (that have nowhere else to park) and the road layout. The junction with Chorley Old Rd suffers from poor and inadequate sight lines. These are exacerbated by more parked cars and the bridge over the former canal just to the north. Hilltop Lane lacks pavements for most of its length, is narrow and unlit. It is not suitable for pedestrian traffic and given the margins on either side is unlikely to be made so. There is already a site with permission for 85 dwellings at the quarry which will use this road. The bridge over the old canal is Grade 2 listed and the junction with Chorley Old Road is already very busy with the adjacent access to commercial premises and the junction of Mill Lane. It also has the constraints of many parked cars. Chorley Old Road itself is already very busy and suffers from many parked cars as properties on it often have no off road parking. The cumulative effect of the three sites proposed in this plan which need to gain access via it and the site already consented at the quarry will have a significant further detrimental effect on the safety and usability of the road and the quality of life for the local residents. The site should be removed.	A planning application is currently under consideration on this site. The applicant is working with Lancashire County Council Highways to seek to secure a suitable access.	No	Yes
	Org.	Private Individual	Site	HS2.37				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B26.2	Rep'r	Mr William Taylor	Policy	Policy HS2: Housing Allocations Chorley	This site relies on Birchin Lane / Hilltop Lane to access Chorley Old Road. None of these roads are suitable to the increase in traffic that would be implied by the development of this site or the adjacent proposed site. Birchin Lane, for the last 180m towards its junction with Chorley Old Road is very narrow and constricted by parked cars (that have nowhere else to park) and the road layout. The junction with Chorley Old Rd suffers from poor and inadequate sight lines. These are exacerbated by more parked cars and the bridge over the former canal just to the north. Hilltop Lane lacks pavements for most of its length, is narrow and unlit. It is not suitable for pedestrian traffic and given the margins on either side is unlikely to be made so. There is already a site with permission for 85 dwellings at the quarry which will use this road. The bridge over the old canal is Grade 2 listed and the junction with Chorley Old Road is already very busy with the adjacent access to commercial premises and the junction of Mill Lane. It also has the constraints of many parked cars. Chorley Old Road itself is already very busy and suffers from many parked cars as properties on it often have no off road parking. The cumulative effect of the three sites proposed in this plan which need to gain access via it and the site already consented at the quarry will have a significant further detrimental effect on the safety and usability of the road and the quality of life for the local residents. The site should be removed.	A planning application is currently under consideration on the adjacent allocation HS2.37. The applicant is working with Lancashire County Council Highways to seek to secure a suitable access. The access would also serve this site.	No	Yes
	Org.	Private Individual	Site	HS2.34				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B26.3	Rep'r	Mr William Taylor	Policy	Policy HS2: Housing Allocations Chorley	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. The site analysis reports that 'Suitable vehicular access should be possible from Delph Way/Cross Keys Drive.' There are 4 potential access points, none of them is suitable for accessing significant numbers of new properties. 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 parking. 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. The position of the site means that most of the journeys from it are likely to be by private car. The nearest bus route along Chorley Old Road is poorly served. 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. The site slopes significantly from northwest to southeast. The slope is also significantly more than is recommended for accessibility of pedestrians, especially	The assessment of this site is included in the SHELAA. The site is considered deliverable. Lancashire County Council Highways raised no objections in relation to securing a suitable access. Access will be determined at the planning application stage. It is not considered that the topography will significantly reduce the yield. Nevertheless, the allocation does not preclude a lower number of dwellings coming forward in line with Policy HS6 if site specific considerations justify it.	No	Yes
	Org.	Private Individual	Site	HS2.36				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					with prams etc, and most especially for wheelchair users. 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.			
B32	Rep'r	Mrs Rosemary Taylor	Policy	Policy HS2: Housing Allocations Chorley	The access to the site through Cross Keys Drive or Delph Way is not suitable as these roads are too narrow and there are shared surfaces with no pavements. There are 4 potential access points to the site and the 3 southernmost ones are all shared surfaces, and one would be through a children's play area. All 4 of the potential access sites go across privately owned land between the roads and the site. The northernmost potential access site is at the top of Cross Keys Drive and the proposed site has a steep gradient. There are already vehicles parked on the roads and pavements making it hazardous for pedestrians and difficult for larger vehicles to access. Any increase in road usage will make it more dangerous for pedestrians and road users. Access to Cross Keys Drive and Delph Way is via Carwood Lane and the junction with Chorley Old Road. There have been a number of near misses at the junction as there is limited visibility turning onto and off Carwood Lane as	The assessment of this site is included in the SHELAA. The site is considered deliverable. Lancashire County Council Highways raised no objections in relation to securing a suitable access. Access will be determined at the planning application stage. It is not considered that the topography will significantly reduce the yield. Nevertheless, the allocation does not preclude a lower number of dwellings coming forward in line with Policy HS6 if site specific considerations justify it.	No	No
	Org.	Private Individual	Site	HS2.36				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			there are always a number of parked cars. Chorley Old Road already has a significant problem with parked cars and 'on pavement parking' and with the proposed other developments at planning stage from e.g. Town Lane the problem is only set to get considerably worse. Pedestrians with prams and those with mobility aids are already forced to take to the roads at times which is not safe. IF the site is to be considered at all the density of the proposed dwellings is too great for the site which is on a considerable slope, and more land will be needed to mitigate the slope by roads and groundworks.			
B34	Rep'r Mr David Holland Org. Private Individual Agent	Policy Policy HS2: Housing Allocations Chorley Site HS2.37	The narrow part of Hill Top Lane off Chorley Old Road to a point east of the two quarry entrances is not suitable for any increase in traffic and would be a danger to all users whether vehicular, cyclist or pedestrian, with many instances of difficulty in any one period. This also applies in the same measure to Birchin Lane for its length immediately off Chorley Old Road until it widens past the furthest end of St Helens Road as Birchin Lane begins to ascend. The increased flow of traffic on an already busy Chorley Old Road will cause considerable further problems with access to houses, parking, suitable passing places and safety for pedestrians, cyclists and children.	A planning application is currently under consideration on this site. The applicant is working with Lancashire County Council Highways to seek to secure a suitable access.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B40	Rep'r	Mrs Lynette Daniels	Policy	Policy HS2: Housing Allocations Chorley	The proposed site is unsuitable, I have concerns regarding safe and secure access and egress. The current plan does not provide adequate or unobstructed entry and exit, which is essential for ensuring safety, facilitating emergency evacuations, and complying with building regulations. As a current resident of Cross Keys Drive, I am already concerned about the ongoing issue of vehicles parking on the pavement. The street is often congested, creating hazards for both pedestrians and motorists. The addition of more properties would only worsen these conditions and significantly increase the risk. As a parent, I'm particularly concerned about the growing volume of traffic on this cul-de-sac and the safety of my children. The site should be removed, if it has to go ahead, reduce the number of units and access is enabled via the approved HS2.35 - which already has planning consent through the side entrance from Town Lane.	The assessment of this site is included in the SHELAA. The site is considered deliverable. Lancashire County Council Highways raised no objections in relation to securing a suitable access. Access will be determined at the planning application stage. It is not considered that the topography will significantly reduce the yield. Nevertheless, the allocation does not preclude a lower number of dwellings coming forward in line with Policy HS6 if site specific considerations justify it.	No	Yes
	Org.	Private Individual	Site	HS2.36				
	Agent							
B42	Rep'r	Mrs Sheena Johnson	Policy	Policy HS2: Housing Allocations Chorley	This proposed land is totally unsuitable for development and should be removed. Cross Keys Drive is already dangerous and single track, opening onto Chorley Old Road, with constant parking on one side of the road. There are 4 roads that wind through the estate to come close to the proposed development. Many of the houses have extra cars parked outside that restrict the narrow residential roads further. These are family homes with children playing outside or on bikes and people walking dogs. There are no footpaths around the majority. The influx	The assessment of this site is included in the SHELAA. The site is considered deliverable. Lancashire County Council Highways raised no objections in relation to securing a suitable access. Access will be determined at the planning application stage. It is not considered that the topography will significantly reduce the yield. Nevertheless, the allocation does not preclude a lower number of dwellings coming forward in line with Policy HS6 if site specific considerations justify it. The Environment Agency have not objected	No	Yes
	Org.	Private Individual	Site	HS2.36				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			of traffic from hundreds of houses would be impossible for these roads to cope with and very unsafe. Cross Keys Drive opens onto Chorley Old Road which is already terrible to drive along, with street parking narrowing the road especially by the Co-Op. This road and residents can't handle more traffic. The fields indicated have a steep slope down to the river. This would make development difficult. There is no reasonable access to public transport. This would result in no alternative to car use which is against the council's policy of encouraging public transport use. There is also evidence that industrial waste was dumped in the quarry and surrounding land. The area needs investigation for as to exactly what was dumped and the health risks of developing such contaminated land. This should include monitoring the river for leaching from the waste materials.	to the allocation as there is no evidence of contamination on the site, instead they have advised that ground testing would be needed as part of any planning application.		
B43	Rep'r: Mrs Emma Woan Org.: Private Individual Agent:	Policy: Policy HS2: Housing Allocations Chorley Site: HS2.36	The site is totally unsuitable and should be removed. Entry and exit not suitable for number of properties and also dangerous for the proposed number of vehicles, the lie of the land/ gradients, and the density of the site. Vehicle access is already quite restricted due to road widths, pavements, and some areas of delph way have no footpaths, lots of children play (there is a child's park) so increased vehicles would be dangerous.	The assessment of this site is included in the SHELAA. The site is considered deliverable. Lancashire County Council Highways raised no objections in relation to securing a suitable access. Access will be determined at the planning application stage. It is not considered that the topography will significantly reduce the yield. Nevertheless, the allocation does not preclude a lower number of dwellings	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			The road from the estate joins Chorley Old Road which is already heavily congested and can't cope with existing volumes of traffic. Access of plant and equipment would not only disrupt residents but cause unnecessary danger and hazards. I don't think the land is suitable to build on due to the gradients and composition of the ground. Local wildlife will be affected, and the water course at the bottom may become polluted. Too many proposed buildings in such a small area which would have additional implications of over overpopulation.	coming forward in line with Policy HS6 if site specific considerations justify it. The Environment Agency have not objected to the allocation as there is no evidence of contamination on the site, instead they have advised that ground testing would be needed as part of any planning application.		
B44	Rep'r: Mr Gary Sutton Org.: Private Individual Agent:	Policy: Policy HS2: Housing Allocations Chorley Site: HS2.36	As of today there is no adequate road access to the site. There are currently 4 pathways to the site that are at the ends of roads that branch off Cross Keys. These areas however are Home Zones where there is a lack of separation of the foot and road traffic. These areas are not suitable to open up for large amounts of traffic. These access areas are also not wide enough to accommodate traffic without considerable changes and purchase of land owned by the houses situated at the access points. There is also considerable amounts of vehicles parked along roads and pavements on Cross Keys, this also includes the entrance to Cross Keys from Chorley Old Road. Chorley Old Road itself also is restricted due to the high amount of parked cars making it generally difficult when navigating, and adding in many further dwellings would increase the traffic considerably.	The assessment of this site is included in the SHELAA. The site is considered deliverable. Lancashire County Council Highways raised no objections in relation to securing a suitable access. Access will be determined at the planning application stage. It is not considered that the topography will significantly reduce the yield. Nevertheless, the allocation does not preclude a lower number of dwellings coming forward in line with Policy HS6 if site specific considerations justify it. The Environment Agency have not objected to the allocation as there is no evidence of contamination on the site, instead they have advised that ground testing would be needed as part of any planning application.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			At the time of this consultation the quantity of dwellings is set to 102. This is much higher than other sites. The site itself has a considerable gradient and as such would need much alteration to make it suitable for building on. Such a high concentration of dwellings and topography of the land would be a challenge. It is understood the site contains contamination from historical industrial waste disposal. Surveys carried out during the purchase of my property also indicate the presence of radon gas and they possess a significant health risk. The development of the site would also increase the levels of sound and light pollution to the immediate area. The site should be removed.			
B47	Rep'r Mr Stuart Briggs Org. Private Individual Agent	Policy Policy HS2: Housing Allocations Chorley Site HS2.36	Site HS2.36 does not contribute to regeneration priorities, and the site has other physical, environmental and policy constraints e.g .character of landscape, importance for biodiversity, green infrastructure, agricultural land, flood risk, neighbouring amenity. Access to the site is not suitable from Delph Way/Cross Keys Drive. All roads through the estate are too narrow for an additional 134% increase in passing through-traffic, with many cars parked along the narrow roadside as many houses have multiple vehicles to park. The estate roads do not have footpaths	The assessment of this site is included in the SHELAA. The site is considered deliverable. Lancashire County Council Highways raised no objections in relation to securing a suitable access. Access will be determined at the planning application stage.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			in various places, resulting in shared vehicle/pedestrian traffic spaces and the risk of accident will increase significantly with the proposed increase in through traffic. The current entrance to both estates must pass through Carwood Lane from the junction with Chorley Old Road. This is a very narrow stretch of road which is reduced to single lane as vehicles are parked on one side. This section of road would not cope with the increase in through-traffic and the frequency of vehicle/pedestrian accidents will increase. Access to Chorley Old Road from the estates would be greatly hindered as traffic along this road will also be significantly increased due to other proposed large developments in the Whittle-le-Woods area. Chorley Old Road is also increasingly difficult to exit from, via School Brow, Shaw Brow and in the vicinity of Hill Top Lane. Access to/from and within the proposed development site will also be hindered due to the steep slope of the land, especially during the winter months. The roads would be approaching small cul-de-sacs from the proposed site in an uphill angle, which would give limited visibility of vehicles /pedestrians / animals in the cul-de-sac, to vehicles that are leaving the proposed site onto Delph Way / Cross Keys. The site should be removed.			

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B55	Rep'r	Mr Kenneth McVie	Policy	Policy HS2: Housing Allocations Chorley	*Note that the representation has been submitted against HS2.4 but comments relate to HS2.36 and so the representation has been processed against HS2.36.* I vehemently object to this planning proposal. Access to the proposed site will be via Carwood Lane and Cross Keys Drive, both of which are narrow lanes with residential housing. Currently, this access point cannot cope with the existing volume, and speed, of traffic accessing Cross Keys Drive. Accessing Carwood Lane from Chorley Old Road is always extremely dangerous given the visibility and turning aspect in addition to current inconsiderate parking so adding more traffic to that lethal junction creates an unacceptable high risk. This proposed development would therefore significantly increase the volume of traffic and therefore the risk of accidents occurring. I worry that any development of that site would disturb toxic matter dumped there decades ago and so will pollute and contaminate the local water table and river.	The assessment of this site is included in the SHELAA. The site is considered deliverable. Lancashire County Council Highways raised no objections in relation to securing a suitable access. Access will be determined at the planning application stage. The Environment Agency have not objected to the allocation as there is no evidence of contamination on the site, instead they have advised that ground testing would be needed as part of any planning application.	No	Yes
	Org.	Private Individual	Site	HS2.36				
	Agent							
B64	Rep'r	John Donnellon	Policy	Policy HS2: Housing Allocations Chorley	The inclusion of a site with a significant flood risk identified by independent Council commissioned flood experts along with a recent Planning Appeal decision that supported a planning refusal and no evidence to the contrary makes an element of the plan unsound. The Parish Council believes the site	The previous planning application was dismissed at appeal as a sequential flood risk assessment had not been submitted. A new planning application has been submitted which removes the area of flood risk from the developable area, no objections relating to flood risk have been received from the	No	Yes
	Org.	Private Individual	Site	HS2.5				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			should be withdrawn from the draft plan to ensure the draft does not risk delay or refusal on the grounds it ignores national flood risk and has been included on the basis of an incomplete and inaccurate site assessment.	Environment Agency or Lead Local Flood Authority. The Council commissioned a flood risk assessment of the site which identified some matters that needed to be addressed but did not identify any significant flood risk issues that could not be mitigated.		
B67	Rep'r: Chris Studley Org.: Private Individual Agent:	Policy: Policy HS2: Housing Allocations Chorley Site: HS2.36	The new properties will greatly increase traffic flow using the junction of Carwood Lane and Chorley Old Rd. The junction serves about 75 homes now, so the proposal is likely to more than double traffic using the junction. This will be made worse if the proposed 130 homes on Hill Top Lane go ahead as traffic from those will also use Chorley Old Road. The streets of Delph Way, Cross Keys and Chorley Old Road are already constrained by vehicles parked on them. Many properties have more cars than parking spaces, restricting effective road width. The roads on the Delph Way and Cross Keys estates are unsuitable to access the proposed number of houses because of their design (some having shared surfaces without pavements, which are meant to serve 30-40 properties, not act as through routes to other developments). The slope on the proposed site will need a steep upwards route to get out of it. This is very bad practice because in snowy and icy conditions it will be difficult to use. Cul-de-sacs should be accessed via slopes up into them if level access is not possible. If the land HAS to	The assessment of this site is included in the SHELAA. The site is considered deliverable. Lancashire County Council Highways raised no objections in relation to securing a suitable access. Access will be determined at the planning application stage.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					be developed, access over the river and through the proposed site opposite onto Town Lane would be much more sensible.			
C1	Rep'r	Ms Amanda Nicholson	Policy	Policy HS2: Housing Allocations Chorley	Assessment of Stage 1(b) SHELAA Assessment incorrectly applied as the site is at high risk of surface water flooding. Site does not therefore satisfy legal requirements, as set out, to proceed to Stage 2 SHELAA Assessment. Flooding is becoming more of an issue in the centre of Bretherton. This is becoming more regular and to a greater depth. The site is a surface water flood plain/reservoir and there would be insufficient space to build sufficient SuDS. Development of this land would have catastrophic surface water flooding consequences for the centre of Bretherton. The Bretherton settlement boundary is incorrect, it excludes properties originally in the settlement to the South of South Road and this site is not in the settlement, it is in the Green Belt. Highways/transport - there is poor public transport and South Road is grid locked at school drop off and collection times. An additional 60 plus vehicles will further block South Road and result in an increased risk of accidents. Utilities – sewage discharges and regularly blocks surface water drains in areas adjoining the land. Data from UU confirms the system is hydrostatically	As identified in the SHELAA, the Stage 1 SFRA recommended that this site should be subject to a Level 2 SFRA due to surface water flooding. The Level 2 SFRA concluded that it should be appropriate to develop this site for more vulnerable purposes given its location in Flood Zone 1 but surface water should be retained onsite which may reduce units. Detailed surface water modelling will be required at the planning application stage. The site was taken forward to Stage 2 of the SHELAA as the Level 1 SFRA did not recommend removal of the site. United Utilities advised that at the planning application stage the applicant must engage with them to consider the detailed design of the site and drainage details. The Bretherton settlement boundary is correct and is the same as that set out in previous Local Plans. HS2.6 is located within the settlement boundary, it is not in the Green Belt. The SHELAA site profile sets out the detailed assessments of the site. No constraints identified in relation to highways but Lancashire County Council have advised a Transport Statement will be required at the planning application stage.	No	Yes
	Org.	Private Individual	Site	HS2.6				
	Agent							

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			inadequate and could not be connected into. Heritage/archaeology – the ridge and furrow structures have existed and served to prevent surface water flooding for many decades. The land abuts the Conservation Area and Grade II assets, development would detrimentally affect their status. The last open green space in the centre of the borough will be lost. Sustainability – there are currently 24 properties under construction in the borough which have been omitted from the plan. This is a breach of duty to correlate full and accurate information. The plan refers to the development as small scale but it is a major development. Ecology – the plan shows blue infrastructure on the land would have to be removed creating a BNG reduction and red listed habitats destroyed.	A Heritage Impact Assessment has been prepared which concludes the site provides a small contribution to the significance of the heritage asset and its setting and the Conservation Area but any impacts can be mitigated. Changes to the setting will not affect the significance of the asset or the appreciation of it providing mitigation measures are put in place. The site requires further archaeological investigation to fully determine any constraints. The Local Plan does not detail all sites with planning permission in the borough and is not required to do so. These sites form the plan period supply and are accounted for in the housing trajectory. The site referred to is not located withing the settlement boundary. BNG and ecology requirements will be dealt with at the planning application stage.		
D02.15	Rep'r Emily Hrycan Org. Historic England Agent	Policy Policy HS2: Housing Allocations Chorley Site	Welcome production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. As drafted, the CLLP does not ensure this evidence is included within the individual site policies contained in Appendix 4 (where relevant). Proposed modification: Insert reference to the Council's HIA [in the KDCs for each site listed within Appendix 4), that says:	Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.			
D04.01	Rep'r	Laura Marchant	Policy	Policy HS2: Housing Allocations Chorley	Homes England support Policy HS2.13 and the allocation of Eaves Green, off Lower Burgh Way, Chorley for 29 dwellings. The allocation is considered sound as it is justified by technical evidence, it is available to be brought forward for development now, offers a sustainable location for development and is consistent with national planning policy.	Support noted.	No	Yes
	Org.	Homes England	Site	HS2.13				
	Agent							
D04.14	Rep'r	Laura Marchant	Policy	Policy HS2: Housing Allocations Chorley	Homes England support Policy HS2.25 and the allocation of Pear Tree Lane, Euxton for 100 dwellings. The allocation is considered sound as it is justified by technical evidence, it is available to be brought forward for development now, offers a sustainable location for development and is consistent with national planning policy.	Support noted.	No	Yes
	Org.	Homes England	Site	HS2.25				
	Agent							
D13.12	Rep'r	Mr Geoff Lavery	Policy	Policy HS2: Housing Allocations Chorley	Thirty-seven separate sites have been allocated and protected for housing development that will see a total of 2,721 new homes constructed. Utilising the Office for National Statistics average household size (2017) of 2.4 persons per household would see a potential increase in population in the Chorley area of,6,350 additional persons. This level of growth would require additional health infrastructure. The Lancashire and South	Noted. Policy HC3 refers to the provision of health facilities.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site					
	Agent							

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			Cumbria ICB is responsible for planning care at the hospital through commissioning the services required. It is anticipated that the private sector will provide dental practices, opticians and pharmacies in line with market demand over the Local Plan period.			
D15.05	Rep'r Andrew Leyssens Org. United Utilties Agent	Policy Site	Policy HS2: Housing Allocations Chorley	With regards to the draft allocations, we have undertaken an initial assessment of potential issues. The assessments relate to: 1. Sites with pressurised water main within the boundary; 2. Sites with a water network structure within the boundary; 3. Sites within 500m of a wastewater treatment works; 4. Sites with a pressurised sewer within the boundary; 5. Sites with a gravity sewer in the boundary; 6. Site within an easement within the boundary; 7. Sites with land owned by United Utilities within the boundary; 8. Sites in proximity to a sewer flooding incident; 9. Site on water catchment land; 10. Sites in groundwater source protection zone 1 or 2; and 11. Sites within an on-site modelled sewer flood risk. We wish to specifically note that a number of your site allocations do not include key development considerations. We object to this approach as we feel all sites should be guided by key	The Councils liaised with United Utilities as part of the SHELAA site assessment work. The above constraints were provided and have therefore already been taken into consideration in the selection of the allocations. It is not considered necessary to include key development considerations for all allocations. They have only been prepared for sites where there are known constraints and/or where there are other issues such as the site being in multiple ownership. Also a number of the allocations already have planning permission therefore it is not necessary to include key development considerations. Constraints will be addressed at the planning application stage. Site HS2.18 already has planning permission therefore key development considerations are not necessary. United Utilities were consulted on this planning application.	No	Yes

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			development considerations to ensure that the constraints which we have identified are reflected by any application for planning permission at the site. Specific concerns raised in relation to site HS2.18. The site contains various large sewer assets and associated combined sewer overflow. An appropriate stand-off distance will be required. This should be agreed in liaison with United Utilities. We request that key development consideration are also identified for this site which reflect these constraints.			
D17.1	Rep'r: Mr James Graham Ashworth Org.: Heath Charnock Parish Council Agent:	Policy: Policy HS2: Housing Allocations Chorley Site: HS2.5	Object to this allocation. The new CLLP proposes another 210 house building plots in Adlingon. This is totally unsustainable given the allocations in the previous plan as well as the allocations in this plan. There has been no extra provision and expansion of our existing local infrastructure. The planning application needs to be supported by a flood risk assessment, a Sequential Test and catchment wide drainage strategy. Note to date no such test has been carried out with any previously submitted planning applications for this site. The Environment Agency advised avoiding development at this site and retaining the existing priority habitat which is providing flood storage and carbon benefits at the issues and options stage. The flood risk assessment of climate change on surface water have not been	The allocation is within the settlement boundary of Adlington which is within Tier 3 of the settlement hierarchy. The Urban Local Service Centres are the tertiary focus for development and contain a range of services and facilities. The previous planning application was dismissed at appeal as a sequential flood risk assessment had not been submitted. A new planning application has been submitted which removes the area of flood risk from the developable area, no objections relating to flood risk have been received from the Environment Agency or Lead Local Flood Authority. The Council commissioned a flood risk assessment of the site which identified some matters that needed to be addressed but did not identify any significant flood risk issues that could not be mitigated.	No	Yes

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			considered. Planning application 23/00510/OUTMAJ was refused by the Development Control Committee and was subsequently referred to the Planning Inspectorate. The appeal was dismissed as the Planning Inspector concluded there was a clear conflict with local and national policy in relation to flood risk. Babylon Lane has for a large distance double yellow lines on the up lane, this has made the passage along Babylon Lane difficult in the extreme and on most occasions a motorist has to pull over or give way in either direction. Lancashire County Council Highways carried out a survey of Babylon Lane on two occasions and they came back with conflicting data, one was low in the traffic count that it could have only been carried out during the school holidays and not during the opening and closing times, this was commented on by a number of local residents.	The Environment Agency recommended removal of the site at the issues and options stage due to flood risk, however they subsequently did not raise any flood risk objections as part of the planning applications on the site. The site was therefore reinstated and has been subject to a flood risk assessment as identified above. Lancashire County Council Highways did not raise any highways objections to the planning applications on the site.		
D17.2	Rep'r: Ms Christine Bailey Org.: Heath Charnock Parish Council Agent:	Policy: Policy HS2: Housing Allocations Chorley Site: HS2.5	The inclusion of a site with a significant flood risk identified by independent Council commissioned flood experts along with a recent Planning Appeal decision that supported a planning refusal and no evidence to the contrary makes an element of the plan unsound. The Parish Council believes the site should be withdrawn from the draft plan to ensure the draft does not risk delay or refusal on the grounds it ignores national flood risk and has been included on the basis of an incomplete and inaccurate	The previous planning application was dismissed at appeal as a sequential flood risk assessment had not been submitted. A new planning application has been submitted which removes the area of flood risk from the developable area, no objections relating to flood risk have been received from the Environment Agency or Lead Local Flood Authority. The Council commissioned a flood risk assessment of the site which identified some matters that needed to be addressed but did not identify any	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			site assessment.	significant flood risk issues that could not be mitigated.		
D21.2	Rep'r: Mrs Glenys Southworth Org.: Bretherton Parish Council Agent:	Policy: Policy HS2: Housing Allocations Chorley Site: HS2.6	This proposal does not comply with 'small scale' being an increase of over 10% in the number of properties in the village and massed in one location. It would not be in-keeping with the village. There are 24 new build properties being completed at Bank Hall which satisfies a Tier 5 settlement development quotient. The site is a natural flood plain with much of the site underwater for large periods of the year. It is shown on Environment Agency maps as having a high chance of experiencing annual surface water flooding. Any building would require significant new drainage infrastructure. The new road infrastructure required to accommodate traffic from the site would not be in-keeping with the village character or surrounding landscapes. It will result in parking issues on South Road. Concerns regarding protection of the ecology and wildlife at this site. Snipe and lapwing feed on the flooded areas in winter and brown hare graze in the summer. The field also provides connectivity as a green corridor. There is an unconfirmed claim that the field contains evidence of ridge and furrow farming practices from medieval times. There are also unconfirmed	One development of 24 dwellings in Bretherton over the plan period is considered small scale. As stated in Policy SS2, Tier 5 settlements will accommodate more limited new development and investment, other than on the sites identified on the Policies Map. As this site is a proposed allocation and shown on the policies map, development other than this allocation will be limited in accordance with this policy. As identified in the SHELAA, the Stage 1 SFRA recommended that this site should be subject to a Level 2 SFRA due to surface water flooding. The Level 2 SFRA concluded that it should be appropriate to develop this site for more vulnerable purposes given its location in Flood Zone 1 but surface water should be retained onsite which may reduce units. Detailed surface water modelling will be required at the planning application stage. The site was taken forward to Stage 2 of the SHELAA as the Level 1 SFRA did not recommend removal of the site. United Utilities advised that at the planning application stage the applicant must engage with them to consider the detailed design of the site and drainage details. The SHELAA site profile sets out the	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			reports that anthrax infected livestock were buried in this field. Contamination of the site should be considered. The site is just outside the boundary of the Conservation Area and the impact on its setting would be required to be considered.	detailed assessments of the site. No constraints are identified in relation to highways but Lancashire County Council have advised a Transport Statement will be required at the planning application stage. Ecology requirements will be dealt with at the planning application stage. There is no evidence of contamination of the land. A Heritage Impact Assessment has been prepared which concludes the site provides a small contribution to the significance of the heritage asset and its setting and the Conservation Area but any impacts can be mitigated. Changes to the setting will not affect the significance of the asset or the appreciation of it providing mitigation measures are put in place. The site requires further archaeological investigation to fully determine any constraints. This can be addressed at the planning application stage.		
D23.1	Rep'r: Mrs Katherine Milnes Org.: Whittle-le-Woods Parish Council Agent:	Policy: Policy HS2: Housing Allocations Chorley Site: HS2.37	A planning application for this site was submitted to Chorley Council in July 2023 and is awaiting a decision. LCC will not support the application due to access difficulties. The land is served by a single track country lane and any route from the lane has exits which are already proved to be difficult to manoeuvre. In the circumstances, the Parish Council contends that this location should not be included in the plan for development.	A planning application is currently under consideration on this site. The applicant is working with Lancashire County Council Highways to seek to secure a suitable access.	No	Yes

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D23.2	Rep'r	Mrs Katherine Milnes	Policy	Policy HS2: Housing Allocations Chorley	A planning application for this site was submitted to Chorley Council in July 2023 and is awaiting a decision. LCC will not support the application due to access difficulties. The land is served by a single track country lane and any route from the lane has exits which are already proved to be difficult to manoeuvre. The Parish Council requests that no planning is permitted at this site.	A planning application is currently under consideration on the adjacent allocation HS2.37. The access to HS2.37 would also serve this site. The applicant is working with Lancashire County Council Highways to seek to secure a suitable access. The access would also serve this site.	No	Yes
	Org.	Whittle-le-Woods Parish Council	Site	HS2.34				
	Agent							
D23.3	Rep'r	Mrs Katherine Milnes	Policy	Policy HS2: Housing Allocations Chorley	This site is close or adjacent to an old nuclear waste tip which was active in the 1950's. The site is well documented and correspondence from the time between the Atomic Energy Authority and government departments is readily available. Originally fenced off, the fence went into disrepair in the 1970's and the public have access by a public footpath. The quarry to the west of the site is now dormant as it has reached its boundary with the nuclear tip. A survey done last year by a Parish Councillor concludes that 90% of residents who have lived within a 250 metre radius of the site for more than 40 years have cancer. They are not all the same type of cancer, i.e. prostate, breast, lymphoma, myeloma, lung etc but it is extremely worrying that this is a high concentration of these ailments in a potentially contaminated area. It is probably best that the site remains undisturbed but obviously further investigation and rigorous testing is required. Under these circumstances it would be irresponsible to include this	The Environment Agency have not objected to the allocation as there is no evidence of contamination on the site, instead they have advised that ground testing would be needed as part of any planning application.	No	Yes
	Org.	Whittle-le-Woods Parish Council	Site	HS2.36				
	Agent							

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					land for development at this time.			
D23.4	Rep'r	Mrs Katherine Milnes	Policy	Policy HS2: Housing Allocations Chorley	This site is close or adjacent to an old nuclear waste tip which was active in the 1950's. The site is well documented and correspondence from the time between the Atomic Energy Authority and government departments is readily available. Originally fenced off, the fence went into disrepair in the 1970's and the public have access by a public footpath. The quarry to the west of the site is now dormant as it has reached its boundary with the nuclear tip. A survey done last year by a Parish Councillor concludes that 90% of residents who have lived within a 250 metre radius of the site for more than 40 years have cancer. They are not all the same type of cancer, ie prostate, breast, lymphoma, myeloma, lung etc but it is extremely worrying that this is a high concentration of these ailments in a potentially contaminated area. It is probably best that the site remains undisturbed but obviously further investigation and rigorous testing is required. Under these circumstances it would be irresponsible to include this land for development at this time.	The site has outline planning permission for 250 dwellings, therefore it has been allocated in the Local Plan. A full application is currently under consideration for 280 dwellings on the majority of the allocation. There is no evidence of contamination on the site.	No	Yes
	Org.	Whittle-le-Woods Parish Council	Site	HS2.35				
	Agent							
D25.6	Rep'r	Mr Richard Sewell	Policy	Policy HS2: Housing Allocations Chorley	Sport England previously provided a consultation response in relation to the preferred site allocations dated 23rd February 2023. This preferred options response has been attached to the representation. Sport England raised concerns that a number of sites had been proposed for either housing or	Comments noted. The following four sites are no longer proposed for allocation in the Regulation 19 Local Plan – CH/HS1.8, CH/HS1.24, CH/HS1.31 and CH/HS1.36.	No	No
	Org.	Sport England	Site					
	Agent							

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			employment allocations that would result in the loss of land being used as a playing field or that had been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). Unfortunately, given resourcing constraints and staff capacity, Sport England do not have the resource to again check whether any of the above sites as referred to in these policies or which are promoted for development would include playing field and/or built sports facilities. Any previous comments raising concerns remain applicable. Sport England's preferred options representation raised the following concerns for 10 sites proposed for allocation at the preferred options stage: CH/HS1.4 - Land South East Belmont Road/Abbey Grove - Potential prejudicial impact on the adjacent Adlington Cricket Club due to potential ball strike risk. CH/HS1.7 - Charter Lane - Potential prejudicial impact in terms of noise and ball strike risk on the adjacent Christ Church Charnock Richard Church of England Primary School playing fields as well as the playing fields to the south. CH/HS1.8 - Camelot Theme Park - Loss of a sporting facility for housing. Park Hall Leisure Club, which according to our records includes a health and fitness gym, two swimming pool and two fitness studio. The sports facility seems to be used by a gymnastics club (Flic Flac	The following three sites are still proposed for allocation in the Regulation 19 Local Plan but they already have planning permission – CH/HS1.28, CH/HS1.30 and CH/HS1.38. For the remaining three sites that Sports England raised concerns about, they are still proposed for allocation in the Regulation 19 Local Plan and the Council is aware of the advice provided by Sport England and will continue to liaise with them as necessary through the planning application process. A small number of new sites were proposed for allocation in the Regulation 19 Local Plan that were not proposed for allocation at the preferred options stage, following the call for sites exercise that ran alongside the preferred options consultation. None of these new allocations contain playing fields or built sports facilities.		

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			Gymnastics). CH/HS1.24 - Westwood Road - Potential prejudicial impact in terms of noise, lighting and ball strike risk on the adjacent St Bede's Catholic Primary School playing field. CH/HS1.25/CH/EP1.10 - Land to the East of Wigan Road (remaining allocation) - Loss of an Equestrian Centre for a mixed use development. CH/HS1.28 - North of Hewlett Avenue - Potential prejudicial impact in terms of noise and ball strike risk on the adjacent playing field at Darlington Street. CH/HS1.30 - Land adjacent to Blainscough Hall, Blainscough Lane - Potential prejudicial impact in terms of noise and lighting on the adjacent playing field used by Coppull United FC. CH/HS1.31 - Coppull Enterprise Centre, Mill Lane - Loss of a sporting facility for housing where a gymnastics club (Appley Bridge School of Gymnastics) and a cheerleading club (Galaxy Cheerleading Club) operate. CH/HS1.36 - Land South of Parr Lane - Potential prejudicial impact in terms of noise and ball strike on the adjacent playing field to the south. CH/HS1.38 - Land at Tincklers Lane - Potential prejudicial impact on the adjacent Eccleston Cricket Club due to potential ball strike risk.			

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D26.02	Rep'r	Ms Rachel Whitaker	Policy	Policy HS2: Housing Allocations Chorley	The proposed allocation must assess the potential impacts to West Pennine Moors SSSI. West Pennine Moors SSSI is notified for a series of scrub, mire, swamp, fen, heath, bog pool, spring, grassland and heath habitats. Lady's mantle and floating water-plantain are also qualifying plant species. The SSSI contains qualifying bird species and assemblages such as black-headed gull, Mediterranean gull, a large heronry, assemblages of upland moorland (such as merlin, curlew, and twite) and woodland breeding birds (such as cuckoo, tree pipit, wood warbler, spotted and pied flycatchers and willow tit).	The Plan should be read as a whole. Policy EN7: Designated Sites for Nature Conservation seeks to prevent developments from having an adverse impact on designated sites and their qualifying features. This includes SSSIs. The site is not located in or immediately adjacent to West Pennine Moors SSSI, therefore there is unlikely to be any impact however Policy EN7 will be applied to any planning application to ensure there are no adverse impacts.	No	No
	Org.	Natural England	Site	HS2.7				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HS3: Housing Allocations South Ribble				Count of Representations against this policy/section: 63		
A06.04	Rep'r: Maple Grove Developments Org.: Maple Grove Developments Agent: Mr Paul Newton	Policy: Policy HS3: Housing Allocations South Ribble Site:	Unclear why Cuerden allocation has not been included within Policy HS3. Site should be noted in the policy or its supporting text to provide clarity. It should also be noted how strategic and other sites allocated for housing will contribute to overall housing delivery figures.	HS3 relates to sites which are allocated solely for residential development. Cuerden is allocated within Policy EC6 as a Mixed-Use Site (EC6.1), owing to its housing and employment allocations. Appendix 6 sets out the Key Development Considerations for the mixed-use site. It is not considered necessary to list the site within HS3 or to explain how strategic and non-strategic residential allocations contribute to overall housing delivery figures. The site is included in the Council's housing delivery forecasts, and details of the borough's identified housing supply are published through the Council's annual housing land position statement.	No	Yes
A24.17	Rep'r: Mrs Joanne Harding Org.: Home Builders Federation Agent:	Policy: Policy HS3: Housing Allocations South Ribble Site:	The HBF do not consider the policy sound as not justified, effective nor consistent with NPPF. The HBF does not comment on individual sites or allocations. The plan should consider an appropriate balance of development to meet all housing needs and deliver against housing requirements. The NPPF requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than 1ha. To support developers in financing their schemes, the HBF wish to see the 10% small sites allowance delivered through allocations and not windfall. The inclusion of non-strategic additional allocations would	The Councils consider that the CLLP policies provide for an appropriate balance of housing needs and can deliver against housing requirements. The Councils expect that at least 10% of the housing requirement will be delivered on sites no larger than 1ha, in accordance with the NPPF. This will include completions that derive from housing allocations, current commitments (sites with planning permission) and windfall sites. Through the SHELAA assessments, South Ribble have identified and assessed potential housing development sites within the borough. All sites have been	No	Yes

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			expand the range of choice in the market and be of scale to make a contribution to housing numbers. The HBF recommend the plan allocates more sites than required to meet the housing requirement buffer and achieve consistency with the NPPF.	included where assessments concluded that the site was deliverable within the local plan period – this includes a number of sites below 1ha in size. In accordance with paragraph 009 of the HELAA PPG, the SHELAA considered all sites and broad locations that were capable of delivering 5 or more dwellings. The SHELAA also evidences that South Ribble has a consistently high supply of windfall completions, many of which stem from small sites. Many new build (and windfall) completions on greenfield land are generally infill (garden land, for example). Such windfall sites cannot always be identified at the start of the plan's preparation to enable their allocation. It would not be feasible or proportionate to seek to allocate these sites. It is, however, reasonable to assume that the small site requirement will be met through existing, and forthcoming, windfall sites. The Councils do not consider that additional sites need to be allocated.		
A28	Rep'r: Ms Holly Froggatt Org.: Homes England Agent:	Policy: Policy HS3: Housing Allocations South Ribble Site: HS3.2	Consider HS3.2 is sound as it is justified by technical evidence, available for development now, and a suitable and sustainable location for new housing development. For completeness, a modification is requested to confirm the capacity of the site is 448 dwellings, not 435 dwellings, and to ensure the policy is justified and	Support for HS3.2 is noted. Figures provided in the KDCs are indicative (circa) and therefore no modification is required to the site capacity.	No	Yes

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					consistent with the NPPF. The KDCs can be met in full and no modifications are considered necessary to the KDCs.			
A30.2	Rep'r	Nightingale Land	Policy	Policy HS3: Housing Allocations South Ribble	Allocation of land at Liverpool Road, Hutton supported. There are no technical constraints to prevent the site coming forward and the site can accommodate the quantum of development proposed.	Support noted.	No	Yes
	Org.	Nightingale Land	Site	HS3.6				
	Agent	Mr John Fleming						
A32.4	Rep'r	Mr Stephen Glenn	Policy	Policy HS3: Housing Allocations South Ribble	Submitted on behalf of Northern Trust, to be read alongside Stantec's 'Housing Land Supply Assessment' dated April 2025. Supplement 1: Consider there are insufficient housing allocations in Policies HS2-HS4; housing allocations do not reflect sustainability objectives; and there are suitable alternatives for allocation. There is a unrealistic reliance on large windfall development sites coming forward in Chorley and South Ribble; anticipated delivery on certain strategic sites is over-optimistic and housing delivery is likely to extend beyond the plan period; too much reliance on historic site allocations which have been carried forward despite evidence to demonstrate constraints have been overcome; and sites which do not meet the NPPF deliverability tests are being	The Council consider that the deliverability information, and delivery forecasts (including build rates), in relation to both allocated, committed and windfalls sites are justified and based on evidence. South Ribble BC have published a Housing Position Statement, including a five-year land supply with a base date of 31 March 2025. This supersedes much of the Representor's evidence. Preston and Chorley councils will publish updated Housing Position Statements in due course.	No	Yes
	Org.	Northern Trust Land Ltd	Site					
	Agent	Mr Alexis De Pol						

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			relied upon within the first five years of the plan. CLLP is allocating insufficient land to meet requirements and so fails tests of soundness. Considers housing allocations have been influenced by what sites are available outside the Green Belt, rather than an overarching strategy, contrary to NPPF objectives. Specific comments provided in respect of HS2.10 (Chorley). Northern Trust promoting series of sites in Eccleston, Croston, Wheelton and Euxton. Response to this to be provided in separate response. Supplement 2: South Ribble BC Housing Land Supply Assessment (Section 7) Stantec have assessed SR's housing land supply, including analysis of draft strategic sites, all proposed allocations, existing commitments over 50 units, and the proposed windfall allowance as to whether they are deliverable/ developable and appraised delivery rates. Their assessment reduces the number of homes they consider can be realistically delivered in South Ribble by 275 dwellings, including the removal / reduction of units of the following sites: Brownedge Road / Railway Sidings, Brambles Rest Home, Pickerings Farm (part of), Kellet Lane, and South of Factory Lane. Existing commitments and windfall have also been assessed. Raise concerns with windfall allowance and			

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					suggest there should no allowance for large scale windfall sites – which would reduce supply by 488 units. Considers that five-year supply should be reduced.			
A42	Rep'r	Ms Susan Fox	Policy	Policy HS3: Housing Allocations South Ribble	The Representor indicated that the Plan is 'Sound' and legally compliant. However, concerns appear to relate to lack of Biodiversity Net Gain in self-build dwellings within the CLLP policy; nature-friendly development; and increased focus on affordable and social housing.	National legislation gives exemption from BNG to self-build dwellings (subject to conditions) and local policy does not and cannot override that legislation. However, where developments are exempt from BNG, the NPPF still requires new development to provide net gains to biodiversity. Policy EN6 reinforces that developments exempt from mandatory BNG shall deliver no net loss. Affordable and social housing requirements are set through Policy HS7.	No	Yes
	Org.	Private Individual	Site	HS3.3				
	Agent							
A46	Rep'r	Mr Neil McManus	Policy	Policy HS3: Housing Allocations South Ribble	Supports allocation of the site. Site is sustainably located, and suitable and available for housing and no technical limitations are known to prevent deliverability of the scheme. Proposed allocations cover only 80% of identified housing requirement, which contradicts CLLP's overall ambition for identified housing requirement.	Support for allocation of the site is noted. Details of how the CLLP housing requirements will be met (allocations / windfall) will be addressed in responses to Policy HS1 and through supporting evidence.	No	Yes
	Org.	Northern Trust Land Ltd	Site	HS3.2				
	Agent	Mr Josh Hellawell						

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A48	Rep'r	Mr Robin Green	Policy	Policy HS3: Housing Allocations South Ribble	Submitted on behalf of a landowner of the site. Considers the allocation to be positively prepared, justified, effective, and consistent with national policy and therefore sound.	Support noted.	No	Yes
	Org.	Private Individual	Site	HS3.9				
	Agent	Mr Chris Betteridge						
A50.3	Rep'r	Mr ChristiaN Orr	Policy	Policy HS3: Housing Allocations South Ribble	Concerns as to whether the allocations set out in HS2, HS3, and HS4 have been properly assessed by sufficient evidence in terms of deliverability. [Cites HS2.1 – Bonds Lane, Chorley) as an example]	The Council's evidence base (including the SHELAA, SFRAs, and Site Selection Process) detail how all of the allocation sites have been assessed and identified. In addition, the Council collect delivery information from landowners/developers to inform their 5-year land supply. The Councils believe all the allocations to be deliverable (suitable, achievable, available). Besides HS2.1 (Chorley), no detailed justification is provided by the representor to explain which of the housing allocation sites are not deliverable and their justification for those conclusions.	No	Yes
	Org.	Hollins Strategic Land	Site					
	Agent							
A55.4	Rep'r	Ms Sophie Eaton	Policy	Policy HS3: Housing Allocations South Ribble	Redrow supports the HBF's call for a sufficient buffer in housing land supply to prevent shortfalls. A surplus of allocated sites would allow for flexibility in the market, ensure delivery against the Housing Delivery Test, and maintenance of a five-year supply. The plan should include a broad range of sites. Site selection has been flawed, hastily withdrawing existing Local Plan designations to push through the Regulation 19 Local Plan. This lacks	The Council's evidence base explains how the housing requirements have been calculated, and how the proposed allocation sites have been assessed and identified. Any existing Local Plan designations which have been removed as allocations are on the basis that evidence no longer demonstrates that they are deliverable. These sites are already excluded from the Council's five-year supply forecasts.	No	Yes
	Org.	Redrow Homes	Site					
	Agent							

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					flexibility in supply and disregards development opportunities, resulting in an unsound strategy.			
A67.5	Rep'r	L&Q	Policy	Policy HS3: Housing Allocations South Ribble	Paragraph 4.24's outlined approach to selecting housing allocations does not fully conform with the SHELAA methodology, or that of the site selection paper. Clarification should be provided with consistency across evidence base and CLLP. Support allocation of HS3.4. HS3 confirms by # that site needs wintering bird survey; this does not reflect findings of HRA assessment and requirement needs to be removed or additional evidence provided. Appendix 4 sets out KDCs for site. o Planning obligations needs to be subject to viability o No evidence to support requirement for wintering birds survey o Updates of discussions with UU and Highways can be provided 250 dwelling capacity is expected to be broadly achievable, but policy requirements may impact on this total figure.	Paragraph 4.24 serves to summarise the process of identifying allocation sites and thus does not go into the same level of detail as the SHELAA or site selection paper, which are separately provided. It is not considered that there is inconsistency between the plan and those evidence papers. The HRA states (paragraph 5.36) that wintering bird surveys (WBS) will be required [through policy] for the site allocations listed in Appendix E: Tables E1, E2, E3 (para 5.13, 5.22, 5.32) which have moderate suitability to support the relevant qualifying bird species. Table E1, Table E2 and Table E3 (and the referenced paragraphs) each include Site HS3.4: South of Factory Lane and East of the west coast main line, Lower Penwortham (19S162 & SRBC009). Therefore, the policy requirement for a WBS accurately reflects the findings of the HRA. The KDCs need to be read in conjunction with the relevant policy – for example, ID2 provides the relevant additional detail in relation to viability. WBS requirements have been addressed above. Comments on dwelling capacity of the site are noted and will be monitored in relation to housing supply as	No	Yes
	Org.	L&Q	Site	HS3.4				
	Agent	Mr Phil Robinson						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						development of the site progresses.		
A69	Rep'r	Mrs Sue Jackson	Policy	Policy HS3: Housing Allocations South Ribble	Support proposed residential allocation HS3.19, however red-edge boundary of site is inaccurate. The capacity of the site should be amended from 5 to 9 dwellings to reflect the achievable development and the correct site boundary (location plan provided below).	The site was assessed in the SHELAA (Site Profile - 19S334x) as two plots, with the boundaries shown below, and assessed as deliverable for 8 units. The site was assessed as suitable, available and achievable. SHELAA 19S334x boundary: (see original rep proforma for map) As the assessments determined the site was deliverable, the site was allocated as HS3.19 with a capacity of 5 units. This was to reflect initial concerns about capacity because the middle part of the site was excluded from the site boundary. A response from the landowner's agent in August 2024 confirmed the site remains available for development but reported that the site area differed from the council's SHELAA drawn area, and so the agent supplied the relevant title plans. The ownership plans show that the whole site is in the same ownership so that the two sites are contiguous (rather than separated as two plots). Both sites are within the urban boundary. The northern parcel which is in the same ownership is within Green Belt and therefore has been discounted from consideration. Title Deed boundaries confirming and	Yes - Mapping PM01	No
	Org.	Private Indivudal	Site	HS3.19				
	Agent	Mrs Deborah Smith						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				ownership: (see original rep proforma for map) In the Regulation 19 consultation, the agent supplied a new plan to confirm the extent of the land ownership (blue) and the area of the achievable development (red). A modification is proposed to amend the allocation boundary to correctly reflect the confirmed land ownership. The Council is in agreement with this. However, due to initial concerns about the potential capacity of the site, the allocation will remain at 5 units. Aerial imagery shows a number of trees on site, which may be a constraint for capacity owing to BNG. Capacities provided through the CLLP are indicative, and the consideration of any higher capacity can be considered through pre-application discussions and planning applications. Regulation 19 supplied plan confirming landownership: (see original rep proforma for map) Proposed Modification: To amend the HS3.19 site boundary to reflect the land ownership boundaries (shown in red) and developable area confirmed through the R19 consultation.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A71	Rep'r	G & W Love	Policy	Policy HS3: Housing Allocations South Ribble	Supports allocation HS3.2: Apsley House. A modification is however necessary to increase the allocations capacity from 435 to 448 dwellings, informed by detailed design work.	Support for policy HS3 / site allocations HS3.2 is welcomed. Each allocation's capacity is intended to be indicative. This is made clear in Apsley House's 'Key Development Considerations'. The policy/allocation is consequently still considered 'sound'.	No	Yes
	Org.	Private Individual	Site	HS3.2				
	Agent							
B02	Rep'r	Mr Michael Collison	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the grounds of: flooding; loss of biodiversity; highway safety; lack of services; traffic and congestion; loss of countryside. There are other sites in South Ribble that could be considered.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt and explained why Chorley's unmet needs has resulted in a redistribution of the housing requirement. Note that no alternative sites were suggested by the representor.	No	No
	Org.	Private Individual	Site	H3.2				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B06	Rep'r	Mr James Jepson	Policy	Policy HS3: Housing Allocations South Ribble	Concerns regarding flood risk. Mutiple flood events occur down Church Lane as a result of surface water run-off. There is a high-water table down Church Lane which exacerbates the issue. Development should not be located in areas of high flood risk – they will just exacerbate the issue.	The Councils have undertaken Level 1 and Level 2 Strategic Flood Risk assessments (FRAs). Level 1 entailed the flood risk screening of potential development sites, and Level 2 then provided higher level flood assessments. HS3.5 / Church Lane was assessed within the Level 1 and Level 2 SFRA as site 19S249 (page 272). The Level 2 SFRA for HS3.5 confirmed the site lies in Flood Zone 1 and is at low risk of flooding from rivers and a low risk of flooding from surface water (SW). There are watercourses on the southern boundary and a waterbody within the site, and there are pockets of surface water flood risk within the site. The SFRA recommendations have been accommodated in the Key Development Considerations for the site.	No	Yes
	Org.	Private Individual	Site	HS3.5				
	Agent							
B07	Rep'r	Mr Andrew Hodson	Policy	Policy HS3: Housing Allocations South Ribble	Object to allocation of site HS3.10 on grounds of: red line boundary includes land not within the ownership of SRBC and land which has already been developed for 5 dwellings (completed in 2022); restrictive covenant forbidding the construction of housing; land is agricultural land and effectively Green Belt.	The CLLP Regulation 19 plan boundaries reflect that of the submitted site (within the SHELAA). However, the eastern part of the site has previously been granted planning permission for residential development (5 houses) and they have since been built out. The boundaries of the allocation should be redrawn, so they accurately reflect the deliverable area of the site. Proposed modification: To correct the boundaries of the allocation site so that they omit the existing built properties to the east of the site. The title deeds for the relevant land	Yes - Mapping PM02	No
	Org.	Private Individual	Site	HS3.10				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						have been checked and there are no restrictive covenants on the site. No other legal restrictions have been identified by SRBC. The proposed allocation is not Green Belt, which is defined through national planning policy, and its use as agricultural land does not make it 'effectively Green Belt'.		
B08	Rep'r	Mr David Marsden, Andrew Marsden and Matthew Marsden	Policy	Policy HS3: Housing Allocations South Ribble	Support allocation and confirm that the site is deliverable.	Support noted.	No	No
	Org.	Private Individual	Site	HS3.9				
	Agent							
B09	Rep'r	Mrs Rachel Cranmer	Policy	Policy HS3: Housing Allocations South Ribble	Objects to the allocation HS3.3 on the grounds of: insufficient consideration given to infrastructure for transport, waste-water or flood risk; the conservation and enhancement of the natural landscape and measures to address climate change. Upgrades are needed to the sewer network before any development is considered. Cuerden (mixed use site) remains empty and should be used for housing.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations (KDCs), informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation.	No	No
	Org.	Private Individual	Site	HS3.3				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						The CLLP policies address development requirements in respect of landscape, biodiversity and addressing climate change. Cuerden is allocated in the CLLP as a mixed-use site; and will include some residential development to help deliver enabling infrastructure for employment uses on most of the site.		
B10	Rep'r	Mr Keith Bolton	Policy	Policy HS3: Housing Allocations South Ribble	The area around the site exit regularly floods in heavy rain and the problem is getting worse. Concerns that development will increase flood risk.	The Councils have undertaken Level 1 and Level 2 Strategic Flood Risk assessments (FRAs). Level 1 entailed the flood risk screening of potential development sites, and Level 2 then provided higher level flood assessments. HS3.5 / Church Lane was assessed within the Level 1 and Level 2 SFRA as site 19S249 (page 272). The Level 2 SFRA for HS3.5 confirmed the site lies in Flood Zone 1 and is at low risk of flooding from rivers and a low risk of flooding from surface water (SW). There are watercourses on the southern boundary and a waterbody within the site, and there are pockets of surface water flood risk within the site. The SFRA recommendations have been accommodated in the Key Development Considerations for the site.	No	No
	Org.	Private Individual	Site	HS3.5				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B12	Rep'r	Mr Inder Kumar	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the grounds of: restrictive covenants preventing construction of residential houses; loss of Green Belt land; SRBC does not own entire land within the red line boundary.	The CLLP Regulation 19 plan boundaries reflect that of the submitted site (within the SHELAA). However, the eastern part of the site has previously been granted planning permission for residential development (5 houses) and they have since been built out. The boundaries of the allocation should be redrawn, so they accurately reflect the deliverable area of the site. Proposed modification: To correct the boundaries of the allocation site so that they omit the existing built properties to the east of the site. The title deeds for the relevant land have been checked and there are no restrictive covenants on the site. No other legal restrictions have been identified by SRBC. The proposed allocation is not Green Belt, which is defined through national planning policy, and its use as agricultural land does not make it 'effectively Green Belt'.	Yes - Mapping PM02	No
	Org.	Private Individual	Site	HS3.10				
	Agent							
B13	Rep'r	Mr Shahid Islam	Policy	Policy HS3: Housing Allocations South Ribble	Object to allocation on the grounds of: Greenfield / Green Belt site, increasing traffic, highway safety, privacy and house prices. The previous Local Plan (2015) Policy E2 allocated the area for commercial use with access from Sceptre Way.	The site is greenfield (undeveloped) but is not Green Belt. The Councils must provide sufficient land for housing but have determined this can be provided on brownfield and greenfield sites outside of the Green Belt and therefore Green Belt review / release is not required. The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to	No	Yes
	Org.	Private Individual	Site	HS3.10				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						inform the selection and allocation of residential development sites. House prices are not a material planning consideration. Some of the land surrounding the relevant site (HS3.10) is protected in the South Ribble Local Plan (2015) for employment, although the site itself is shown as 'white' (undesignated) land. As part of the review of housing and employment need, and the need to identify and allocate sites suitable for development, the site is proposed for redesignation as a housing allocation.		
B14	Rep'r Org. Agent	Mrs Rachel Cranmer Private Individual	Policy Site	Policy HS3: Housing Allocations South Ribble HS3.3	Object to the allocation on the grounds of: inconsistent with NPPF and sustainable development; not been shaped with the engagement of communities; not been accessible for public involvement; no evidence that infrastructure has been considered (transport, waste management, flood risk) (photographs supplied of flooding on land); Longton sewer network is in need of upgrading – network is hydraulically inadequate. Plans should set out contributions expected from development, including affordable housing and infrastructure – the CLLP has not done this.	The CLLP policies confirm when and how developer contributions will be required, and include, where appropriate, details of how costs and/or affordable housing provision will be calculated. However, requirements can only ever be confirmed at a planning application stage when full details of the proposed scheme are available. In advance of that, the KDCs confirm development requirements for the site. The Councils have consulted at various stages of the CLLP's preparation through a variety of methods – and these are detailed in the Consultation Statement. Engagement by third parties, such as Story, is made separately and independently to any CLLP consultation undertaken by the Council. The Representor's residual matters are	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						responded to within Representation ref: B9.		
B15.2	Rep'r	Mr Neil Smith	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the grounds of: site not justified as unsuitable due to the potential effect on traffic in the local area; access/egress; flood risk; cumulative impact with other local proposed developments. In respect of Appendix D, there is inconsistency between the KDCs for site HS3.2 and HS3.5 in respect of comments about Church Lane. [HS3.2 states 'Church Lane is relatively narrow, and visibility is impacted by the railway bridge'. HS3.5 states 'Suitable vehicular access should be achievable from Church Lane'.] Further consideration should be given to an alternative site at former Camelot theme park. This would help rebalance the housing allocations across the three council areas.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt and explained why Chorley's unmet needs has resulted in a redistribution of the housing requirement. Whilst a brownfield site, Camelot is located within the Green Belt and is also considered less sustainably located. As sufficient sites have been identified outside of the Green Belt to meet the Council's identified needs, Green Belt land is not being considered. In relation to inconsistency between the KDCs for sites HS3.2 and HS3.5, the wording has been taken from comments received from LCC, as the local highways authority, in relation to access.	No	Yes
	Org.	Private Individual	Site	HS3.2				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						HS3.2 assumes natural access to the site would be primarily achieved from the north of the site (Chain House Lane / Coote Lane), with potential secondary access from Church Lane. HS3.5 assumes natural access would be primarily taken from Church Lane, with access achieved from the south via Croston Road, or from the north of Church Lane.		
B18	Rep'r	Mrs Anna Foster	Policy	Policy HS3: Housing Allocations South Ribble	In December 2022, land had not been selected as a preferred option due to its location next to a Wastewater Treatment Works (WWTW), flooding from Wade Brook and the wildlife corridor. Inclusion of site now is not sound nor justified nor an appropriate strategy. Object to the allocation on the grounds of: odour from the WWTW; flood risk; loss of wildlife; inadequate social and economic infrastructure (including schools, doctors, shops, transport links); area already saturated with new housing; loss of green space. Emnie Lane should be removed as an allocation from the plan.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt and explained why Chorley's unmet needs has resulted in a redistribution of the housing requirement. The land had not been initially selected as a preferred option as other, more preferential sites were available to	No	Yes
	Org.	Private Individual	Site	HS3.1				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				accommodate need identified at that time. However, as the Councils are now required to provide greater numbers of housing, more suitable land must be identified and allocated. The site is assessed as deliverable and therefore included as an allocation.		
B19	Rep'r Mr Shaun Foster Org. Private Individual Agent	Policy Policy HS3: Housing Allocations South Ribble Site HS3.1	In December 2022, land had not been selected as a preferred option due to its location next to a Wastewater Treatment Works (WWTW), flooding from Wade Brook and the wildlife corridor. Inclusion of site now is not sound nor justified nor an appropriate strategy. Object to the allocation on the grounds of: odour from the WWTW; flood risk; loss of wildlife; inadequate social and economic infrastructure (including schools, doctors, shops, transport links); area already saturated with new housing; loss of green space.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt. The land had not been initially selected as a preferred option as other, more preferential sites were available to accommodate need identified at that time. However, as the Councils are now required to provide greater numbers of housing, more suitable land must be identified and allocated. The site is assessed as deliverable and therefore included as an allocation.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B23.1	Rep'r	Ms Shelley Quinn	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the following grounds: plan is not positively prepared as it fails to demonstrate a clear strategy to meet objectively assessed needs. In relation to Chapel Lane, another junction is needed from the [A59] bypass; not clear how access and infrastructure needs will be met on this site and how traffic will be managed; insufficient evidence that SRBC has engaged with other bodies e.g. highways and has not demonstrated duty to co-operate. Plan appears predetermined rather than objectively assessed. Plan does not support sustainable development, protect the green Belt or promote brownfield development. Proposed Modifications: It is for SRBC to address the issues.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. The Council's evidence base includes details of how it has met its Duty to Co-operate. Whilst the Chapel Lane site is greenfield (undeveloped), it is not Green Belt. There are no proposals within the CLLP to amend Green Belt boundaries. The CLLP confirms that the reuse of brownfield land is a key priority of the plan (paragraph 4.16). However, the Councils must provide sufficient land for housing and have confirmed that they have allocated suitable and available	No	No
	Org.	Private Individual	Site	HS3.3				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						brownfield sites outside of the Green Belt and explained why Chorley's unmet needs has resulted in a redistribution of the housing requirement. Creating another junction to the A59 would require the use of Green Belt land, which the Council are not pursuing at this time.		
B23.2	Rep'r	Ms Shelley Quinn	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the following grounds: plan is not positively prepared as it fails to demonstrate a clear strategy to meet objectively assessed needs. In relation to Marsh Lane, lane is overdeveloped; insufficient evidence that SRBC has engaged with other bodies e.g. highways and has not demonstrated duty to co-operate. Plan appears predetermined rather than objectively assessed. Plan does not support sustainable development, protect the green Belt or promote brownfield development. Proposed Modifications: It is for SRBC to address the issues.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. The Council's evidence base includes details of how it has met its Duty to Co-operate.	No	No
	Org.	Private Individual	Site	HS3.19				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				Whilst the Marsh Lane site is greenfield (undeveloped), it is not Green Belt. There are no proposals within the CLLP to amend Green Belt boundaries. The CLLP confirms that the reuse of brownfield land is a key priority of the plan (paragraph 4.16). However, the Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt and explained why Chorley's unmet needs has resulted in a redistribution of the housing requirement.		
B24	Rep'r: Mr Andrew Hodson Org.: Private Individual Agent:	Policy: Policy HS3: Housing Allocations South Ribble Site: HS3.10	Object to the allocation on the grounds of: restrictive covenant exists preventing erection of buildings on land; previous consultation (Dec 2022-Feb 2023) stated no preferred sites in the Bamber Bridge East area and therefore council have not acted in accordance with Regulation 19; SRBC do not own all the land shown by the existing site boundaries; traffic surveys have not been undertaken appropriately; existing congestion on Kellet Lane.	he Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The land had not been initially selected as a preferred option as other, more preferential sites were available to accommodate need identified at that time. However, as the Councils are now required to provide greater numbers of housing, more suitable land must be identified and allocated. The site is assessed as deliverable and therefore included as an allocation. The CLLP Regulation 19 plan boundaries reflect that of the submitted site (within the SHELAA). However, the eastern part of the site has previously been granted planning permission for residential development (5 houses) and they have since been built out. The boundaries of	Yes - Mapping PM02	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						the allocation should be redrawn, so they accurately reflect the deliverable area of the site. Proposed modification: To correct the boundaries of the allocation site so that they omit the existing built properties to the east of the site. The title deeds for the relevant land have been checked and there are no restrictive covenants on the site. No other legal restrictions have been identified by SRBC.		
B27	Rep'r	Mr Russell Lamping	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the following grounds: amount of dwellings proposed is not safe or appropriate; highway safety, traffic and congestion issues along Chapel Lane; flood risk; new site borders a nature reserve; loss of habitat; loss of village character; devaluation of area.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development.	No	No
	Org.	Private Individual	Site	HS3.3				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						Longton Brickcroft, a local nature reserve, is the closest designated nature reserve/site to the proposed allocation HS3.3. However, the proposed site does not border the nature reserve. Mitigation measures are included within the site-specific KDCs and wider policies of the CLLP to protect and enhance ecology and biodiversity, including the requirement for wintering birds' surveys as part of any planning application on the site. Additional ecological provision is provided through mandatory Biodiversity Net Gain (BNG).		
B28	Rep'r	Ms James Jepson	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the following grounds: flood risk; loss of wildlife; congestion and highway safety; no provision made for additional schools, doctors, dentists; additional houses are not in keeping with the village character; A582 is congested and development will make this worse; A582 needs widening before any houses are built.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the	No	No
	Org.	Private Individual	Site	HS3.3				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						development.		
B29	Rep'r	Ms Lyndsey Roe	Policy	Policy HS3: Housing Allocations South Ribble	Object to allocation on grounds of: CLLP not justified or effective; negative impact on nature and village character; road congestion; existing flooding. Don't build in the Green Belt – protect it.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. The proposed allocation is greenfield (undeveloped land) not Green Belt.	No	No
	Org.	Private Individual	Site	HS3.3				
	Agent							
B30	Rep'r	Mr Stephen Tilley	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the grounds of: falsehoods relating to the identification of the land within the Local Plan since the 1990s but the land has never been included in any local plan. Requests removal of the site from the plan.	The site was allocated in the South Ribble Local Plan (2000) for c.60 dwellings and known as site 'K'. It is currently not covered by a designation (often referred to as 'White Land'). As part of the review of housing and employment need, and the need to identify and allocate sites suitable for	No	Yes
	Org.	Private Individual	Site	HS3.10				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						development, the site is proposed for redesignation as a housing allocation.		
B31	Rep'r	Mr Ian Burton	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the following grounds: access to the site from Chapel Lane is not sound owing to the volumes of traffic, congestion and parking issues on Chapel Lane, School Land, Liverpool Road, Chapel Park Road; additional traffic will affect the A59. It would be sensible to add another junction to the A59 to the south of Chapel Lane to allow unrestricted access to the development site without exacerbating existing traffic issues.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. Creating another junction to the A59 would require the use of Green Belt land, which the Council are not pursuing at this time. Access to the site can be achieved from Chapel Lane. Any planning application for development on the site will require a Transport Assessment (and/or Travel Plan) that provides a detailed assessment of transport and highways issues and identifies appropriate mitigation	No	No
	Org.	Private Individual	Site	HS3.3				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						solutions to be provided through the development.		
B33.2	Rep'r	Mr Nigel Healy	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the following grounds: Housing is not compatible with a travel plan; site access is congested single track lane in a semi-rural area where a car is required; Longton population is already saturated. Vehicle access should be provided from the A59 with a new roundabout and pedestrian only access to Chapel Lane.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. Creating another junction to the A59 would require the use of Green Belt land, which the Council are not pursuing at this time. Access to the site can be achieved from Chapel Lane. Any planning application for development on the site will require a Transport Assessment (and/or Travel Plan) that provides a detailed assessment of transport and highways issues and identifies appropriate mitigation	No	Yes
	Org.	Private Individual	Site	HS3.3				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						solutions to be provided through the development. Policy ST2 requires new development to promote sustainable and active travel. Major developments shall be accompanied by a Transport Assessment and Travel Plan. Travel Plans work to increase opportunities for walking, cycling or using public transport.		
B35	Rep'r Org. Agent	Mrs Margaret Robinson Private Individual	Policy Site	Policy HS3: Housing Allocations South Ribble HS3.3	Object to the allocation on the following grounds: proposed access road from Chapel Lane is narrow and already congested at peak times; will not provide affordable housing to meet local needs. Access to the site should be provided from the A59, not Chapel Lane. Build houses that are affordable.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. Creating another junction to the A59 would require the use of Green Belt land, which the Council are not pursuing	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						at this time. Access to the site can be achieved from Chapel Lane. Any planning application for development on the site will require a Transport Assessment (and/or Travel Plan) that provides a detailed assessment of transport and highways issues and identifies appropriate mitigation solutions to be provided through the development. CLLP Policy HS7 guides requirements for the provision of affordable housing on residential developments of 10 dwellings or more.		
B38.2	Rep'r Org. Agent	Miss Angel Jewitt Private Individual	Policy Site	Policy HS3: Housing Allocations South Ribble HS3.6	Object to the allocation on the grounds of: use of greenfield rather than brownfield; traffic associated with Hutton Grammar School; inadequate habitat buffer zone; contribution to urban sprawl; loss of character; increase in traffic and need for a new roundabout at Ratten Lane.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt and explained why Chorley's unmet needs has resulted in a redistribution of the housing requirement.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B38.3	Rep'r	Miss Angel Jewitt	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the following grounds: building on the site will adversely affect the SPA/Ramsar site; Grade II listed farmhouse on the land should be protected as heritage asset; deer use the site and are protected by the Deer Act 1981 – destroying their habitat would go against the Act; site holds TPOs and hedge field patterns; development will affect residents mental health through the loss of greenbelt and ruined woodland; increase in traffic; new roundabout will be needed on the A59 with pedestrian only access to Chapel Lane.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The KDCs also afford policy provision and guidance to heritage assets, TPOs and hedge/field patterns, and protected species – wintering bird surveys will be required for any development on the site in respect of the SPA/Ramsar sites. The scope of the Plan's legal compliance test only extends to laws directly related to plan-making procedures. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. Creating another junction to the A59 would require the use of Green Belt land, which the Council are not pursuing	No	Yes
	Org.	Private Individual	Site	HS3.3				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						at this time. Access to the site can be achieved from Chapel Lane. Any planning application for development on the site will require a Transport Assessment (and/or Travel Plan) that provides a detailed assessment of transport and highways issues and identifies appropriate mitigation solutions to be provided through the development. The site is greenfield (undeveloped land) but is not Green Belt.		
B39	Rep'r	Mrs Victoria Robinson	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the following grounds: breech [sp] of the Care Act 2014 on the grounds of: traffic congestion and accidents; flooding; harm to nature. Proposed Modifications: Pedestrian only access to Chapel Lane, with new junction/roundabout access from the A59; installation of traffic camera along Chapel Lane and School Lane; significant upgrade to the existing sewage and surface water drainage systems.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development.	No	No
	Org.	Private Individual	Site	HS3.3				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						Creating another junction to the A59 would require the use of Green Belt land, which the Council are not pursuing at this time. Access to the site can be achieved from Chapel Lane. Any planning application for development on the site will require a Transport Assessment (and/or Travel Plan) that provides a detailed assessment of transport and highways issues and identifies appropriate mitigation solutions to be provided through the development.		
B41	Rep'r Org. Agent	Mrs Jennifer Jepson Private Individual	Policy Site	Policy HS3: Housing Allocations South Ribble HS3.3	Object to the allocation on the following grounds: traffic volumes and highway safety; road already requires traffic calming measures; junction with School Lane/Chapel Lane is already difficult and more housing will lead to more accidents; doctors and schools can't cope with increased residents; loss of wildlife and habitat; loss of village character. Need better infrastructure, more schools and doctors.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B45	Rep'r	Mr Rob Jepson	Policy	Policy HS3: Housing Allocations South Ribble	Object to allocation on following grounds: flood risk; loss of habitat and species; congestion on Chapel Lane; narrow footpaths, highway safety; no provision for schools, doctors or dentists, already full locally; destroying village character; routes to major transport links are already overloaded. Build elsewhere near to major transport links and not on greenfield sites within the village. Infrastructure needed before housing is built.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. CLLP Policy SS2 guides development to the most sustainable areas (tier 1 and tier 2 settlements) but recognises that an appropriate and proportionate level of development in smaller and rural settlements is important (paragraph 3.16).	No	No
	Org.	Private Individual	Site	HS3.3				
	Agent							
B46	Rep'r	Mr Peter Fisher	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the grounds of: road safety, including entry/exit to Walton Gardens; inappropriate development and loss of open character	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of	No	No
	Org.	Private Individual	Site	HS3.6				

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent				/ village amenity; impact on biodiversity and connectivity to wildlife corridors and habitats; use of South Ribble land to meet Chorley's housing needs; disproportionate growth in Hutton.	residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt and explained why Chorley's unmet needs has resulted in a redistribution of the housing requirement.		
B52	Rep'r	Mrs Nicola Lamping	Policy	Policy HS3: Housing Allocations South Ribble	Object to the allocation on the following grounds: proposed housing in Longton is not appropriate; existing congestion and highways issues along Chapel Lane; flood risk and sewage network; loss of biodiversity. Proposed modifications: Find an alternative site for housing in South Ribble – why is Longton carrying Chorley's housing requirements? Reduce the number of proposed houses, new roadworks to make surrounding streets safe and accessible; fully consider impacts on wildlife.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority	No	No
	Org.	Private Individual	Site	HS3.3				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt and explained why Chorley's unmet needs has resulted in a redistribution of the housing requirement.		
B54	Rep'r Org. Agent	Ms Jennifer Turner Private Individual	Policy Site	Policy HS3: Housing Allocations South Ribble HS3.8	Strongly support allocation of HS3.8. Site is available, not subject to any constraints and developable. There is market interest in the site and it is likely a planning application will be brought forward in the near future.	Support noted.	No	No
B57.1	Rep'r Org. Agent	Joanna Holden Private Individual	Policy Site	Policy HS3: Housing Allocations South Ribble HS3.6	Object to the allocation on the grounds of: poor publicity and communication of the consultation; loss of green belt land; loss of biodiversity; increase in traffic; highway safety; use of South Ribble land to take Chorley's housing need.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt and explained why Chorley's unmet needs has resulted in a redistribution of the housing requirement. Whilst the site is greenfield (undeveloped), it is not Green Belt. The CLLP consultation was publicised through a variety of methods, as detailed within the Council's Consultation Statement.		
B57.2	Rep'r Org. Agent	Joanna Holden Private Individual	Policy Site	Policy HS3: Housing Allocations South Ribble HS3.3	Object to the allocation on the following grounds: no communication to local residents on the proposals or when to raise objections by; loss of green belt; loss of species / habitat; concerns about additional traffic to Chapel Lane and local area; highway safety. Stop sacrificing green belt land – there is supposed to be policy in place to protect it. Unclear as to why South Ribble has volunteered to take housing due to be in Chorley. Plan should deal with excessive traffic before adding anymore.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						developers will be required to provide appropriate solutions through the development. The Councils have consulted at various stages of the CLLP's preparation through a variety of methods – and these are detailed in the Consultation Statement. The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt and explained why Chorley's unmet needs has resulted in a redistribution of the housing requirement. Whilst the proposed allocation site is greenfield (undeveloped land), it is not Green Belt.		
B61	Rep'r Org. Agent	Suzanne Purdon Private Individual	Policy Site	Policy HS3: Housing Allocations South Ribble HS3.1	In December 2022, land had not been selected as a preferred option due to its location next to a Waste Water Treatment Works (WWTW), flooding from Wade Brook and the wildlife corridor. Inclusion of site now is not sound nor justified nor an appropriate strategy. Object to the allocation on the grounds of: odour from the WWTW; flood risk; loss of wildlife; inadequate social and economic infrastructure (including schools, doctors, shops, transport links); area already saturated with new housing; loss of green space.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils must provide sufficient land for housing and have confirmed	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						that they have allocated all suitable and available brownfield sites outside of the Green Belt. The land had not been initially selected as a preferred option as other, more preferential sites were available to accommodate need identified at that time. However, as the Councils are now required to provide greater numbers of housing, more suitable land must be identified and allocated. The site is assessed as deliverable and therefore included as an allocation.		
B62	Rep'r Org. Agent	Dominic Purdon Private Individual	Policy Site	Policy HS3: Housing Allocations South Ribble HS3.1	In December 2022, land had not been selected as a preferred option due to its location next to a Waste Water Treatment Works (WWTW), flooding from Wade Brook and the wildlife corridor. Inclusion of site now is not sound nor justified nor an appropriate strategy. Object to the allocation on the grounds of: odour from the WWTW; flood risk; loss of wildlife; inadequate social and economic infrastructure (including schools, doctors, shops, transport links); area already saturated with new housing; loss of green space.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt. The land had not been initially selected as a preferred option as other, more preferential sites were available to	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						accommodate need identified at that time. However, as the Councils are now required to provide greater numbers of housing, more suitable land must be identified and allocated. The site is assessed as deliverable and therefore included as an allocation.		
B63	Rep'r	Shirley Mills	Policy	Policy HS3: Housing Allocations South Ribble	Object on grounds of: noise, dirt, traffic volume, insufficient infrastructure (doctors, schools), loss of farmland, proximity to WWTW, impacts on local community. Housing development is unsuitable and the site should be removed from the allocations.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology.	No	Yes
	Org.	Private Individual	Site	HS3.1				
	Agent							
B69	Rep'r	Christopher Holden	Policy	Policy HS3: Housing Allocations South Ribble	Object to allocation on the following grounds: lack of infrastructure, schools and doctors; unsafe road networks; destroying green belt Modifications: scrap it all.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology.	No	Yes
	Org.	Private Individual	Site	HS3.3				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. The Councils have consulted at various stages of the CLLP's preparation through a variety of methods – and these are detailed in the Consultation Statement. The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt. Whilst the proposed allocation site is greenfield (undeveloped land), it is not Green Belt.		
B71	Rep'r: Helen Hill Org.: Private Individual Agent:	Policy: Policy HS3: Housing Allocations South Ribble Site: HS3.3	Object to the allocation on the following grounds: not justified – no reasonable alternatives presented; highway safety / road access / noise and disturbance; road access to the proposed development (via Chapel Lane); loss of nature/wildlife; local amenity capacity; loss of light / overlooking; general proposals within the development, including layout; noise/disturbance. Land to the rear of Fielding's Close is a particular cause for	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site,	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			concern.	including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. There appears to be some confusion in the representation between the CLLP (proposed allocation of the HS3.3 site for residential development) and the community engagement being undertaken by Pegasus / Story Homes to inform the preparation of a planning application for the site. Consultation undertaken by Story is made separately and independently to that of the Councils, for their own purposes. Any proposals regarding layout etc are a matter for a planning application and will be considered through that determination process.		
C5	Rep'r: Mr and Mrs J Whitworth Org.: Private Individual Agent:	Policy: Policy HS3: Housing Allocations South Ribble Site: HS3.3	Object to the allocation on the following grounds: general need for all the extra housing proposed; traffic, highway safety and infrastructure; foul and surface water drainage.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. The Councils must provide sufficient land for housing and have confirmed that they have allocated all suitable and available brownfield sites outside of the Green Belt and explained why Chorley's unmet needs has resulted in a redistribution of the housing requirement. Explanations of how the housing need figures have been calculated are provided through the Local Plan evidence.		
D02.16	Rep'r Emily Hrycan Org. Historic England Agent	Policy Site	Policy HS3: Housing Allocations South Ribble	Welcome production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. As drafted, the CLLP does not ensure this evidence is included within the individual site policies contained in Appendix 4 (where relevant). Proposed modification: Insert reference to the Council's HIA [in the KDCs for each site listed within Appendix 4), that says:	Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.			
D04.04	Rep'r	Laura Marchant	Policy	Policy HS3: Housing Allocations South Ribble	Support allocation of site; considered sound – justified by technical evidence, deliverable, sustainably located and consistent with the NPPF. Proposed modification: to amend the allocation boundary to reflect Home England's full ownership (Appendix C of accompanying documentation). Question whether it is appropriate to include area to north of proposed allocation (identified as EN5 and HC6) within the development site.	Support for policy HS3 / site allocations HS3.1 noted. Proposed modifications (mapping) HS3.1 – Amend boundary to reflect Homes England land ownership relating to developable land only. The land north of the proposed allocation shall be retained as EN5 (green infrastructure). Note the exclusion of this land from the proposed allocation does not preclude this from being included within a planning application boundary and be used to meet other objectives such as Open Space and/or BNG.	Yes - Mapping PM03	Yes
	Org.	Homes England	Site	HS3.1				
	Agent							
D04.15	Rep'r	Laura Marchant	Policy	Policy HS3: Housing Allocations South Ribble	Support allocation of site; considered sound – justified by technical evidence, deliverable, sustainably located and consistent with the NPPF. Multiple landowners are working collaboratively to deliver the site. Proposed modification: to amend the capacity of the site from 435 dwellings to 448 dwellings. Note that site is in other ownerships; but the Homes England land has capacity for c.220 dwellings. Evidence is provided through a joint	Support for policy HS3 / site allocations HS3.2 noted. The site capacity figure quoted is indicative and does not bind the site to the number of units it can deliver. No changes are therefore required to the policy or accompanying KDCs – it can remain at circa 435 units.	No	Yes
	Org.	Homes England	Site	HS3.2				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					Concept Framework for the allocation to support increased capacity figure.			
D04.16	Rep'r	Laura Marchant	Policy	Policy HS3: Housing Allocations South Ribble	HS3.5 – Church Lane, Farington - support policy HS3.5 and allocation of site; considered sound – justified by technical evidence, deliverable, sustainably located and consistent with the NPPF. Proposed modification: to amend the allocation boundary to reflect Home England's full ownership (Appendix C of accompanying documentation) (relates to minor errors at the edge of the boundary to the north, north-west and south).	Support for policy HS3 / site allocations HS3.5 noted. Proposed modifications (mapping) HS3.5 – Amend boundary to reflect Homes England land ownership	Yes - Mapping PM04	Yes
	Org.	Homes England	Site	HS3.5				
	Agent							
D05.4	Rep'r	Angela Brookes	Policy	Policy HS3: Housing Allocations South Ribble	The proposed Key Development Considerations (KDCs) should respond to the existing overhead cable route running through the site. The below modification is proposed in the interests of making the policy more effective: The development will include a strategy for responding to the National Grid Overhead Cable Route present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.	It is expected that the National Grid will be consulted regarding applications at the site during the usual Development Management process. Consequently, it is unnecessary to reference this specific requirement within the policy.	No	No
	Org.	National Grid Electricity Transmission	Site	HS3.2				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D08	Rep'r	Sue Whittam	Policy	Policy HS3: Housing Allocations South Ribble	The size and scale of development across the whole of our Parish area is excessive. Farington already has major traffic issues. Physical and Social Infrastructure should be in place before any new houses are built	The Plan proposes to meet its housing and economic growth targets by guiding development towards sustainable locations. The Plan's Transport Study will explore opportunities to reduce congestion, which will prioritise sustainable transport solutions. The Plan's development management policies requiring Transport Assessments and Travel Plans for major planning applications will mitigate impacts upon the highway. The Plan is also supported by an Infrastructure Delivery Plan, detailing the additional Physical and Social Infrastructure necessary. This will be delivered in phases, consistent with the levels of development during the Plan period.	No	No
	Org.	Farington Parish Council	Site					
	Agent							
D13.13	Rep'r	Mr Geoff Lavery	Policy	Policy HS3: Housing Allocations South Ribble	Nineteen separate sites have been allocated and protected for housing development that will see a total of 2,333 new homes constructed. Utilising the Office for National Statistics average household size (2017) of 2.4 persons per household would see a potential increase in population in the South Ribble area of,5,599 additional persons. The Lancashire and South Cumbria ICB is responsible for planning care at the hospital through commissioning the services required. It is anticipated that the private sector will provide dental practices, opticians and pharmacies in line with market demand over the Local Plan period.	Noted. Policy HC3 refers to the provision of health facilities.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D15.02	Rep'r	Andrew Leyssens	Policy	Policy HS3: Housing Allocations South Ribble	Site specific issues raised have not adequately addressed concerns / constraints which UU have identified. Number of sites do not include key development considerations – UU object to this approach. A list of site-specific issues / constraints is provided with the representation – UU request that all these issues are reflected in key development considerations for all sites. Specific concerns raised in relation to growth in Longton / Hutton. UU have explained preference for proportionate settlement growth, and that growth above and beyond that already identified in the adopted Local Plan is not brought forward in Longton so impact on infrastructure, especially the public sewer, can be more appropriately managed. UU note the allocation of sites in Longton and Hutton and therefore request details of foul and surface water drainage strategies are supplied as soon as possible to enable UU to understand impact on the sewer network. This will help inform UU decision on whether investment in this location should be prioritised.	The Council wrote policies / key development considerations (KDCs) for a number of HS3 allocation sites (HS3.1-HS3.9). Should the Inspector(s) determine that KDCs would be appropriate for all allocation sites then this can be prepared as required. Comments noted. UU have proposed modifications to address these concerns through their representation – these are addressed in the response to D15.3.	No	Yes
	Org.	United Utilties	Site	HS3.3				
	Agent							
D15.03	Rep'r	Andrew Leyssens	Policy	Policy HS3: Housing Allocations South Ribble	The site Land south of Chapel Lane is affected by a range of flood risk issues; being in proximity to sewer flooding incidents and a modelled sewer flood risk. Site is partially subject to surface water flood risk. Strongly recommend that site policy identifies the need to fully understand any flood risk concerns and ensure any flood waters are not	The Councils recognise that wording changes as proposed could improve the clarity of the proposed KDCs but consider the KDCs as drafted are sound. Other policies within the CLLP address the matters raised – e.g. EN1 sets out requirements for significant schemes to provide a Masterplan, and EN10 and EN11 set out requirements relating to	No	Yes
	Org.	United Utilties	Site	HS3.3				
	Agent							

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					displaced. UU note parcel of land is comprised of multiple land ownerships. Policy needs to include clear need for a masterplan and an allocation wide infrastructure strategy to ensure development is brought forward in coordinated manner. Development should not be brought forward in a fragmented manner to the detriment of sustainable management of foul and surface water. Request amendments to the Key Development Considerations. Recommend the policy at this site is also discussed with the Lead Local Flood Authority (LLFA).	drainage and flood risk.		
D15.04	Rep'r Org. Agent	Andrew Leyssens United Utilties	Policy Site	Policy HS3: Housing Allocations South Ribble HS3.1	Request key development considerations for this site are expanded, as proposed, to add further clarification in respect of the adjacent waste water treatment works (WWTW). UU confirm they have engaged extensively with Homes England for the site and is reflective of the site constraints.	The Councils recognise that wording changes as proposed could improve the clarity of the proposed KDCs but consider the KDCs as drafted are sound. Other policies within the CLLP address the matters raised – e.g. EN14 sets requirements around odours and environmental quality.	No	Yes
D25.7	Rep'r Org. Agent	Mr Richard Sewell Sport England	Policy Site	Policy HS3: Housing Allocations South Ribble	Please note that Sport England previously provided a consultation response in relation to the preferred site allocations dated 23rd February 2023 (please find this attached for your consideration). Sport England raised concerns that a number of sites had been proposed for either housing or	Comments noted. Several of the sites above have planning permission and are not being taken forward as allocations.	No	No

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			employment allocations that would result in the loss of land being used as a playing field or that had been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). Unfortunately, given resourcing constraints and staff capacity, Sport England do not have the resource to again check whether any of the above sites as referred to in these policies or which are promoted for development would include playing field and/or built sports facilities. Any previous comments raising concerns remain applicable. Sites raised at PO stage were: SR/HS1.4 - Land South of Chapel Lane, Longton, Preston, PR4 5EB - Potential prejudicial impact on the adjacent St Oswald's Catholic Primary School playing field, in terms of ball strike and noise. SR/HS1.5 - East of Leyland Rd/Land off Claytongate Dr/Land at Moor Hey School/Bellefield (Belle Wood View)- Potential prejudicial impact on the adjacent	For those that are being taken forward as allocations, the Council is aware of the advice provided by Sport England and will continue to liaise with them as necessary through the planning application process.		

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			Moor Hey School playing field, in terms of ball strike and noise. SR/HS1.12 - Lostock Hall Primary School, Avondale Dr - Loss of playing field. SR/HS1.14 - Land Sth of Hampshire Rd (Eccleston Homes - Holland House Farm)- Potential prejudicial impact on the adjacent playing field at Holland House Road, in terms of ball strike and noise. SR/HS1.17 - Brindle Rd, Bamber Bridge (Land adj Cttg Gdns) - Dorbcrest Homes - Potential prejudicial impact on the adjacent Bamber Bridge Football Ground, in terms of ball strike, noise and lighting. SR/HS1.20 - Land adjoining Longton Hall Frm, Sth of Chapel Ln, Longton - Potential prejudicial impact on the adjacent Bamber Bridge Football Ground, in terms of ball strike and noise. SR/HS1.21 - Vernon Carus Site/Penwortham Mills, Factory Ln excl Sumpter Horse Site - Potential prejudicial impact on the adjacent Vernon Venus Sports Club, in terms of ball strike and noise. A contribution should also be sought for additional demand for sporting facilities.		

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					SR/HS1.27/SR/HS1.28 - Lostock Hall Gas Works, Leyland Rd/The Cawsey/Land at Leyland Rd, Lostock Hall (Morris Homes - St Mary's Park) aka Land between Lyme Rd and The Cawsey - Potential prejudicial impact on the adjacent Lostock St Gerards playing fields, in terms of ball strike and noise.			
D26.21	Rep'r	Ms Rachel Whitaker	Policy	Policy HS3: Housing Allocations South Ribble	Natural England have identified that the proposed allocation HS3.13 is on deep peat. NE advise policy wording reflects the safeguard of deep restorable peat and makes provisions for tailored habitat opportunities. Peat surveys may be required.	In their comments, NE refer to national peat mapping. The mapping shows that a very small area of land, to the north of the HS3.13 site, falls under a deep peaty soils designation. Development of an area this size would not be expected to have a significant impact on the loss of peatland; part of the identified peatland area is already covered by the B5253 road which runs adjacent to the allocation site. Policy CC1 requires development proposals to address climate change, including providing carbon storage and sequestration through nature-based solutions; whilst EN6 guides habitat provision through BNG and Policy EN14 requires development to not result in significant harm to soil quality. It is not considered that the policy requires any modification to specifically highlight the presence of a small amount of peatland on HS3.13 and any associated mitigation. This will be addressed through other existing CLLP policies.	No	No
	Org.	Natural England	Site	HS3.13				
	Agent							

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				HS3.13 is not presently accompanied by any key development considerations.		

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Policy HS4: Housing Allocations Preston				Count of Representations against this policy/section:		14
A24.19	Rep'r: Mrs Joanne Harding Org.: Home Builders Federation Agent:	Policy: Policy HS4: Housing Allocations Preston Site:	The HBF do not consider the policy sound as not justified, effective nor consistent with NPPF. The HBF does not comment on individual sites or allocations. The plan should consider an appropriate balance of development to meet all housing needs and deliver against housing requirements. The NPPF requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than 1ha. To support developers in financing their schemes, the HBF wish to see the 10% small sites allowance delivered through allocations and not windfall. The inclusion of non-strategic additional allocations would expand the range of choice in the market and be of scale to make a contribution to housing numbers. The HBF recommend the plan allocates more sites than required to meet the housing requirement buffer and achieve consistency with the NPPF.	The Councils consider that the CLLP policies provide for an appropriate balance of housing needs and can deliver against housing requirements. The Councils expect that at least 10% of the housing requirement will be delivered on sites no larger than 1ha, in accordance with the NPPF. This will include completions that derive from housing allocations, current commitments (sites with planning permission) and windfall sites. Through the SHELAA assessments, Preston City Council have identified and assessed potential housing development sites within the district. All sites have been included where assessments concluded that the site was deliverable within the local plan period – this includes a number of sites below 1ha in size. In accordance with paragraph 009 of the HELAA PPG, the SHELAA considered all sites and broad locations that were capable of delivering 5 or more dwellings in Preston . The Councils do not consider that additional sites need to be allocated.	No	Yes

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A32.5	Rep'r	Mr Stephen Glenn	Policy	Policy HS4: Housing Allocations Preston	Stantec Housing Land Supply Assessment has been submitted on behalf of a Consortium of Housebuilders. Section 6 of the report on 'Preston City Council Housing Land Supply Assessment' deals with Preston allocations. Section 6 of the report states allocated sites in Preston should be reduced by 2,359 units (table 6.1), 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 as they are brownfield sites in the Preston City Centra area. Commentary on each site to be removed: HS4.6 Horrocks Mill – States that no evidence a Reserved Matters is being prepared or delivery commentary from developer. Significant development is envisaged in this part of the City Centre with no evidence the market can accommodate the numbers proposed. HS4.8 115 Church Street – States that the Site is currently in use as a temporary car park. Surface water flood risk to the north of the Site and around the access road. Adjacent to a Grade II building. High levels of surface water flood risk to the north of the Site and around the access road. The Site may be of archaeological interest. Part of wider regeneration area to the east of Preston City Centre. No evidence the market can accommodate high density development is this location.	In identifying land for homes strategic policy-making authorities should have a clear understanding of available land before identifying a supply of sufficient, specific 'deliverable' sites for the first five years of the Local Plan following adoption; alongside specific 'developable' sites or broad locations for growth for years 6-10 and where possible 11-15 of the Local Plan. (NPPF Paragraph 72). A pragmatic approach has been taken to assessing availability and achievability of sites for development. Evidence has been obtained through the use of Site Promoter Surveys, annual Housing Land Position Site Proformas and detailed land owner discussions. In line with NPPF paragraphs 110, 115 and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment and housing growth.	No	Yes
	Org.	Northern Trust Land Ltd	Site	Numerous allocations				
	Agent	Mr Alexis De Pol						

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			HS4.9 37-41 Church Street – States that the Site is currently in use as a temporary car park. An existing building is in situ at the Site. Not clear whether in use. No planning permission. No evidence to suggest the market accommodate the scale of high-density development envisaged at this part of Preston. HS4.11 Former Tulketh High School – States there is no known developer interest. There are some small areas of surface water flood risk, and the eastern edge of the Site is within Flood Zones 2 and 3. LCC has plans for the redevelopment of the Former Tulketh High School for a new secondary school. The deadline for this decision is said to be the end of March 2025, and so the future of this Site is not yet confirmed. HS4.13 Heather Moor Cumeragh Lane - States there is no known developer interest. This Site is within an Area of Separation under the current 2012- 2026 Preston Local Plan. The representation states that with no evidence that the highways and flood risk issues can be overcome, and with no known developer interest, the Site is considered to be undeliverable HS4.14 Gorlands Whittingham Road – States there is no known developer interest. This Site is within an Area of Separation under the current 2012- 2026 Preston Local Plan. The representation states that with no evidence that the highways and flood risk issues can be overcome, and with no known developer			

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			interest, the Site is considered to be undeliverable. HS4.15 Lancashire Fire & Rescue HQ – States the site is a brownfield site with existing fire and rescue operation evident. Legacy allocation (HS1.1). No developer interest and no planning application submitted. HS4.16 Bretherens Meeting Room, Egerton Road – States the site is a brownfield site with existing building at centre of site. Legacy allocation (HS1.12). No developer interest and no planning application submitted. No evidence that 12 dwellings can be accommodated at the site (with offset distances and BNG etc.). HS4.18 Former St Joseph's Orphanage, Theatre Street, PR1 8BS – States a technical start has been made on site; however, development has stalled. No evidence to suggest there is an appetite from the developer to complete scheme, or whether the market can accommodate development in this part of Preston viably. HS4.19 Avenham Street Car Park – States there is no evidence to suggest a start has been made on site and thus permission may have expired. Legacy allocation under SP4.2. No evidence to suggest there is an appetite from the developer to complete scheme, or whether the market can accommodate development in this part of Preston viably considering the scale of			

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			development envisaged in east Preston (especially one of this density / scale at 16 storeys). HS4.20 Grimshaw Street/Queen Street – States no evidence a Reserved Matters is being prepared or delivery commentary from developer. Significant development is envisaged in this part of the City Centre with no evidence the market can accommodate the numbers proposed. The Council envisaged development coming forward in 10+ years which suggests they have no confidence the outline permission will be progressed. HS4.21Former Byron Hotel, Grimshaw Street – States a technical start has made but development has not come forward. No evidence to suggest development will come forward or that the market can absorb an apartment scheme in this location. HS4.22 Mount Street / Garden Street – States the Site is known to be promoted by Northern Estates Limited, and has permission for 47no apartments, but this is said to have stalled. No evidence to suggest development is being progressed. Following three arson attacks, the building has been left unsafe and demolition works are to begin again. This is expected in March/April 2025 HS4.23 Former Perrys car Showroom – States the Council disposed the planning application for the site in March 2025. The draft allocation is situated on a Landfill Site, and is said to have risk of			

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			contamination. Surface water flood risk within the centre of the site. In the absence of developer interest, and with the above constraints and planning history in mind, the Site is not considered deliverable. HS4.26 Former Gasworks Ribbleton Lane – States the Site was historically occupied by gasholders, but these were removed in 2018/19. The land is still said to be at risk of contamination due to this industrial use. The Site is surrounded on three sides by other employment and industrial uses. There is a small pocket of woodland within the north of the Site. In the absence of developer interest or any evidence to suggest how this constrained site can positively come forward, this site is not considered deliverable. HS4.27 50 Lancaster Road – States this Site is expected to come forward for apartment use / conversion of the existing building. The parcel is within the Market Place Conservation Area and the building is Listed. The Site is said to be suitable for housing or a mixed-use site with housing, office or retail. The Site is subject to surface water flood risk to the west. HS4.28 10-12 Lancaster Road – States this Site is expected to come forward for apartment use / conversion of the existing building. The parcel is within the Market Place Conservation Area and the building is Listed. The Site is said to be suitable for housing or a mixed-use site with housing, office or retail. The Site is			

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					subject to surface water flood risk to the west. HS4.29 Corner of Manchester Road & Church Street – States a planning application is currently under consideration for 280 units. The application site includes the eastern half of the Site along with the land to the north. However, no documents have been uploaded since March 2024 which suggests the application has stalled. This site has large gravity sewers that pass through the Site. There are two Grade II listed buildings on the Site, and a Grade II listed church adjacent. There are high levels of surface water flood risk across the entire site. (84% has 1 in 1000 year flood risk). No evidence to suggest a scheme at the site is viable or deliverable. In the absence of developer interest, it is not clear how the remainder of the Site (western parcel) will come forward alongside the eastern parcel that is currently subject to a planning application.			
A50.4	Rep'r Org. Agent	Mr ChristiaN Orr Hollins Strategic Land	Policy Site	Policy HS4: Housing Allocations Preston General assessment of	Concerns as to whether the allocations set out in HS2, HS3, and HS4 have been properly assessed by sufficient evidence in terms of deliverability.	The Council's evidence base (including the SHELAA, SFRAs, and Site Selection Process) detail how all of the allocation sites have been assessed and identified. In addition, the Council collect delivery information from landowners/developers to inform their 5-year land supply. The Councils believe all the allocations to be deliverable (suitable, achievable, available).	No	Yes

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A55.5	Rep'r	Ms Sophie Eaton	Policy	Policy HS4: Housing Allocations Preston	Redrow supports the concerns raised by the HBF regarding the housing allocations set out in Policies HS2, HS3 and HS4. The HBF has emphasised the 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. Redrow agrees that the Plan should provide a diverse range of deliverable and developable sites across the Borough, promoting competition and choice to achieve the required housing supply.	The Council's evidence base explains how the housing requirements have been calculated, and how the allocation sites have been assessed and identified.	No	Yes
	Org.	Redrow Homes	Site	Housing figure				
	Agent							
A68.07	Rep'r	Wain Homes North West	Policy	Policy HS4: Housing Allocations Preston	Cardwell farm - Our client supports the identification of their site at Policy HS4 as a site allocation for 151 no. dwellings (HS4.4). A reserved matters application is lodged with the LPA for Phase 2 by our client and construction work on this scheme will comprise a continuation of the Phase 1 scheme by Wain Homes once Phase 1 is completed. However, we would ask that the Policies Map is updated to include our client's Phase 1 land as within the site allocation boundaries and that it is thereby also excluded from the designated open countryside to reflect the grant of planning permission 06/2022/0644.	The Council welcome support for HS4.4 Phase 1 of Cardwells Farm and note the amendment required to the policies map to reflect the correct site boundary within the Barton settlement boundary as requested.	No	No
	Org.	Wain Homes North West	Site					
	Agent	Stephen Harris						
B59.2	Rep'r	Fairhaven Housing Association	Policy	Policy HS4: Housing Allocations Preston	Note that the Representation Proforma cites comments against Appendix 4 of the plan, but the referenced supporting documents refers to HS4. As Appendix 4	The councils recognise that wording changes proposed may help support development of the specific type of housing we are seeking to deliver. The	No	Yes
	Org.	Fairhaven Housing Association	Site	HS4.13 & 4.14				

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	Agent Mrs Deborah Smith		details key development considerations for the housing allocations, comments have been recorded against HS4 (housing allocations). Sites: HS4.13 Heather Moor, Cumeragh Lane & HS4.14 Gorlands, Whittingham Road The allocations are welcomed by Fairhaven. Wilson Mason Architects has prepared a proposed site plan for both allocations and has demonstrated the site's suitability for housing for older people. The site is ideally located on the edge of Longridge with good access to local services and facilities, including nearby bus stops. There are no known constraints that would prevent the sites coming forward for older persons' housing. Fairhaven finds it impossible to compete with volume housebuilders in the acquisition of land. This is largely due to the provision of single storey homes and a community centre which are central to the Fairhaven offer. A specific allocation is therefore welcomed. Whilst the policies are generally sound, it would be helpful if the policies narrowed down the eligibility criteria to service led housing for older people to take into account of the difficulty that developers' such as Fairhaven face in competing for land. It is requested that Policies HS4.13 and HS4.14 do not include a requirement to provide affordable housing. The	councils will continue to work with Fairhaven through the examination process on any wording change to refer to service led housing for older people.		

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					Fairhaven schemes comprise a community hub and attractive areas of open space for its residents. The provision of affordable housing does not form part of the Fairhaven model for viability reasons given it is a not-for-profit organisation. The plan should be modified to remove the need to comply with Policy HS7: Affordable Housing, which is applied to general open market housing			
D02.17	Rep'r Org. Agent	Emily Hrycan Historic England	Policy Site	Policy HS4: Housing Allocations Preston	Welcome production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. As drafted, the CLLP does not ensure this evidence is included within the individual site policies contained in Appendix 4 (where relevant). Proposed modification: Insert reference to the Council's HIA [in the KDCs for each site listed within Appendix 4), that says: Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.	Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance.	No	No
D04.06	Rep'r Org. Agent	Laura Marchant Homes England	Policy Site	Policy HS4: Housing Allocations Preston	Homes England are supportive in principle of the allocation of Land at Eastway in Policy HS4.3, however consider the policy not sound as an element is unjustified. Homes England consider that the capacity of this Site is greater than that proposed in the emerging policy HS4.3.	Council notes the need for a correction to the boundary for this site. At this time the council are not proposing any changes to the policy wording for this site. The land was identified to deliver a park and ride facility, and some community benefit is expected to be delivered in this location. The council will continue to work with Homes	Yes - Mapping PM21	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Viability appraisal highlights that viability is challenging and there is a need to pursue a higher capacity of up to 95 dwellings. Homes England consider that Eastway is not suitable for sports pitch provision. The Site is only 4.3 hectares in size therefore it would be unlikely that the Site could accommodate such sport provision (and ancillary uses such as changing facilities, toilets etc), alongside car parking. Sport pitches would also require appropriate setbacks / buffers to the residential uses (as usually required by Sports England) and also to the M55, reducing the area for this provision considerably. Central Lancashire Playing Pitch Strategy & Action Plan (2018) identifies a need for sports pitch provision linked to anticipated housing growth across Preston. The majority of this housing growth is set to be delivered in the west of the North West Preston area, some distance from the Eastway Site. To align with the concentration of this housing growth, and ensure they are easily accessible by the local community, we consider a more appropriate strategy for the provision of new sports pitches would be to locate them to the west of North West Preston and not on the Eastway Site. The Site has been identified in the Strategic Housing and Economic Land Availability Assessment (SHELAA, January 2025) as being suitable for housing and 'being suitable, available, and achievable with mitigable constraints'.	England on the delivery of this and other sites in their control and recognise the positive working relative between Homes England and PCC which have supported the delivery of high-quality development in the area.		

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			Modification: A modification is requested to reflect the overall allocation capacity of 95 dwellings. A modification is requested to change the wording of the Key Development Considerations: Planning Obligations ID2 to: 'The Site is suitable for a residential led development and could accommodate affordable housing or extra care along with open space/sports pitch provision commensurate with the scale of residential development proposed. A planning contribution may be required to help mitigate the impacts of development. A minor amendment to the allocation boundary is also requested.			
D05.5	Rep'r Angela Brookes Org. National Grid Electricity Transmission Agent	Policy Policy HS4: Housing Allocations Preston Site HS4.2	Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure. Proposed Modification: Policy HS4: Housing Allocations Preston - HS4.2 Land off Riversway & West of Dodney Drive Lea # (To include an asterisk so that the Key Development Considerations set out within Appendix 4	Proposed modification not considered necessary as above matters have been taken into consideration at outline planning consent. Site has planning permission and is currently under construction.	No	No

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					apply) Within the Key Development Considerations table: Infrastructure: The development will include a strategy for responding to the National Grid Overhead Cable Route present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.			
D13.14	Rep'r Org. Agent	Mr Geoff Lavery Lancashire & South Cumbria Integrated Care Board	Policy Site	Policy HS4: Housing Allocations Preston	In addition to the strategic sites within Preston there are an additional thirty separate sites that have been allocated and protected for housing development that will see a total of 2,942 new homes constructed. Utilising the Office for National Statistics average household size (2017) of 2.4 persons per household would see a potential increase in population in the Preston area of,5,981 additional persons. The Lancashire and South Cumbria ICB is responsible for planning care at the hospital through commissioning the services required. It is anticipated that the private sector will provide dental practices, opticians and pharmacies in line with market demand over the Local Plan period.	Noted. Policy HC3 refers to the provision of health facilities.	No	No
D15.06	Rep'r Org. Agent	Andrew Leyssens United Utilties	Policy Site	Policy HS4: Housing Allocations Preston	With regards to the draft allocations, we have undertaken an initial assessment of potential issues. The assessments relate to: 1. Sites with pressurised water main	It is not considered necessary to include key development considerations for all allocations. They have only been prepared for sites where there are known constraints and/or where there	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			within the boundary; 2. Sites with a water network structure within the boundary; 3. Sites within 500m of a wastewater treatment works; 4. Sites with a pressurised sewer within the boundary; 5. Sites with a gravity sewer in the boundary; 6. Site within an easement within the boundary; 7. Sites with land owned by United Utilities within the boundary; 8. Sites in proximity to a sewer flooding incident; 9. Site on water catchment land; 10. Sites in groundwater source protection zone 1 or 2; and 11. Sites within an on-site modelled sewer flood risk. We wish to specifically note that a number of your site allocations do not include key development considerations. We object to this approach as we feel all sites should be guided by key development considerations to ensure that the constraints which we have identified are reflected by any application for planning permission at the site.	are other issues such as the site being in multiple ownership. The above constraints were provided through ongoing engagement with UU and have therefore already been taken into consideration in the selection of the allocations and are noted on the site specific proforma for each allocation.		
D19.6	Rep'r Mr Philip Carter Org. Environment Agency Agent	Policy Policy HS4: Housing Allocations Preston Site HS4.4	Allocation HS4.4 Cardwell Farm, Garstang Road Allocation HS4.4 has areas of medium and high flood risk within the site boundary. While a Level 2 SFRA has not been completed for this, given the extent	Mapping error, HS4.4 allocation boundary to be redrawn to match the approved planning application boundary.	Yes - mapping PM12	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					of the Flood Zones on site, we are satisfied that a site layout could be delivered which avoids inappropriate development in areas of high flood risk but more information is required to demonstrate the risk to the site is manageable. Modification proposed: To ensure that any future development takes account of flood risk and it avoids inappropriate areas of high flood risk, we request that HS4.4 is included in Appendix 4 to identify site specific flood risk constraints that developers need to be aware of and which will inform future planning decisions. Alternatively, the allocation boundary could be redrawn to match the approved planning application boundary which avoids the flood risk areas.			
D20.9	Rep'r	Mrs Julie Buttle	Policy	Policy HS4: Housing Allocations Preston	Duty to co-operate - There is no reason to exclude sites HS4.13 and HS4.14 from the area of separation - as requested by the Parish Council during the Call for Sites consultation. Justified - there is no supporting evidence to suggest that homes for the elderly are required in this location especially as homes for the elderly have already been provided off Cumeragh Lane and are being built in Grimsargh. Positively prepared - LCC highways comments appear to oppose the location stating that the site would require a staggered junction at Halfpenny Lane	The Council's evidence base (including the SHELAA, SFRAs, and Site Selection Process) detail how all of the allocation sites have been assessed and identified. In addition, the Council collect delivery information from landowners/developers to inform their 5-year land supply. The Councils believe all the allocations to be deliverable (suitable, achievable, available). The Preston Housing Need and Demand Assessment has also identified a continued need for over 55's accommodation to be provided throughout the plan period. The council will consider wording changes through the EiP to tighten the restrictions for the	No	Yes
	Org.	Whittingham Parish Council	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			which may result in safety concerns and may contribute to known strategic pinch points. The Parish Council adds its concern to the number of new junctions that will be created along Whittingham Road where speeding traffic is a known safety concern - including several accidents at the Halfpenny Lane junction. Under the key development consideration - drainage - it states the site has access to mains water, electric, gas and broadband, but it fails to mention properties are on septic tanks instead of the main sewer. Effective - It remains a fair distance for elderly people to walk to Aldi or into Longridge and it would involve them crossing Whittingham Lane which is a busy main route between Longridge and Preston. LCC Highways also express concerns that he footways are narrow and absent on some sections of Cumeragh Lane. Proposed modifications: Concern is expressed that once the principle of development is established in this location, developers will state that homes for the elderly are no longer viable and will submit an application for general housing. For this reason and those stated above, Whittingham Parish Council wishes to see both HS4.13 and HS4.14 removed from the Local Plan and the sites included in the Area of Separation.	type of development that can be delivered on these sites to secure the provision of this type of housing.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D25.8	Rep'r	Mr Richard Sewell	Policy	Policy HS4: Housing Allocations Preston	Sport England previously provided a consultation response in relation to the preferred site allocations dated 23rd February 2023. Sport England raised concerns that a number of sites had been proposed for either housing or employment allocations that would result in the loss of land being used as a playing field or that had been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595) Sport England do not have the resource to again check whether any of the above sites as referred to in these policies or which are promoted for development would include playing field and/or built sports facilities. Any previous comments raising concerns remain applicable.	A number of the sites identified are addressed through responses D25.2-4. A number of the sites are not being taken forward as allocations. Comments are noted for those sites that are being carried forward.	No	No
	Org.	Sport England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments				Count of Representations against this policy/section:	8			
A32.6	Rep'r	Mr Stephen Glenn	Policy	Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments	The policy states that all major new residential developments must make provision for open space in accordance with standards set out in the table within the policy. However, the methodology behind the specific requirements and why the requirements are in excess of the national benchmark is unclear and not justified.	There is no rigid national benchmark so the requirements are not considered to be in excess. The NPPF provides overarching guidance for integrating green infrastructure, and local authorities can develop their own open space standards based on their specific needs and priorities. Local Plans often incorporate guidance from organisations like Fields in Trust and the Design Council, emphasising the importance of accessible, well-designed, and multi-functional open spaces. The Central Lancashire Open Space Assessment Report, which can be found on the respective Councils websites, set out the standards and the methodology used to determine them.	No	Yes
	Org.	Northern Trust Land Ltd	Site					
	Agent	Mr Alexis De Pol						
A41.5	Rep'r	Rowland Homes Limited	Policy	Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments	The calculation of open space per typology is unjustified and is flawed due to it being based on current provision rather than from need generated by new development. Furthermore, the cost per dwelling for financial off-site contributions has not been evidenced in the Viability Assessment specifically for Chorley which has a higher cost per dwelling requirement compared with Preston and South Ribble. The Council should review the evidence base, and the proposed table in Policy HS5 should be proportionate and reflect needs generated by future development.	The Central Lancashire Open Space Assessment Report, which can be found on the respective Councils websites, set out the standards and the methodology used to determine them. The Open Space calculation is determined using current provision and population figures. The standards vary for each authority owing to different quantities and different population sizes and therefore this is reflected in the cost per typology. Shortfalls by typology in each ward/settlement determine where new open space should established to make up that shortfall and compensate	No	Yes
	Org.	Rowland Homes Limited	Site					
	Agent	Mr Brian O Connor						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					Additionally, the Viability Report should be updated to account for Chorley's financial off-site open space contributions rather than take a blended rate across the CLLP area.	for the new demand on open space. The policy takes into consideration the level of demand in Step 1 to calculate the open space requirement generated by the housing development. The Viability Assessment adopted a blended rate across the plan area based on the offsite contribution calculations provided.		
A61.5	Rep'r	Mr Rob Haslam	Policy	Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments	The cost of providing off-site financial contributions for open space requirements in line with the standards and methodology set out in Policy HS5 should be factored into viability considerations for SS5. The representor has reviewed the typology standards for Preston set out in Policy HS5, the supporting methodology for calculating open space provision and the Central Lancashire Open Space Study which provides an up-to-date assessment of need and provides information on the quantity, quality, and accessibility of open spaces across Central Lancashire. Harworth has no significant concerns with the approach set out in the policy and supporting methodology, provided the requirements of the policy do not adversely impact the viability position of the site. The 2023 NPPF and PPG are clear that viability assessments should be undertaken at the plan making stage. There is currently limited information set out in the viability calculation in relation	The Plan is supported by the Central Lancashire Local Plan Viability Report by Aspinall Verdi. The Viability Assessment takes into account the requirements of Policy HS5 (see page 23). It is not considered necessary to update the viability report or amend policy HS5.	No	Yes
	Org.	Harworth Estates	Site					
	Agent	Mr Brian O Connor						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					to open space requirements. Recommended that the CLLP Main Viability Report be updated to ensure all relevant consideration are factored into the appraisal with accurate and proportionate costs for open space requirements.			
A63.8	Rep'r Org. Agent	PWA Planning PWA Planning Mr Paul Walton	Policy Site	Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments	The policy is not clear as to when off-site contributions will be acceptable. Additionally, there is no explicit viability clause, meaning that in cases where meeting these standards could make a development unviable, there is no clear mechanism for adjustment. Recommended that Policy HS5 is reworded to include a viability assessment mechanism to adjust open space requirements where necessary and clarify when off-site contributions are acceptable.	It is considered that 'Step 2' of the policy is clear when off-site contributions will be required. It is common practice for viability matters to be taken into consideration during the planning application process, in accordance with Paragraph 59 of the NPPF.	No	Yes
B65.5	Rep'r Org. Agent	Messrs Rankin, Patel and Briggs Private Individual	Policy Site	Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments	Policy HS5 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. Land at Preston Road, Grimsargh is an example where the opportunity to provide a new, strategic area of open space which will benefit existing and future residents of Grimsargh. The policy should therefore state that where new open space is proposed that goes beyond policy	It is not considered necessary to make such an alteration to the policy as the policy is considered robust and encompassing. Any open space provision that goes beyond the requirements as set out within the emerging Local Plan will be weighed as part of the planning balance if an application is made.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					requirements, the plan will support their development.			
D04.11	Rep'r	Laura Marchant	Policy	Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments	Homes England support Policy HS5, however note that the open space requirements vary across the three authorities and ask if this is correct based on the methodology set out in Paragraph 4.27 and modify the Policy if necessary. As the Central Lancashire Open Space Assessment Report (2019) is six years old, there is a concern as to whether this is effective to support a policy position, particularly linked with the requirements of sport pitch provision at Eastway (HS4.3). Request that HS5 is modified to include a green buffer along the M55 (specifically regarding HS4.3) to mitigate noise and air pollution.	The approach taken within HS5, specifically regarding the varying of open space requirements, is the intended approach by the Councils. It is considered that the evidence base supporting this policy is robust, and it should also be noted that the playing pitch evidence base and OSSRS is currently being updated. These will be the basis for Open Sace assessments once adopted. In regards to HS5, the green buffer is included in the North West Preston Masterplan and would be expected to be implemented through development of this site.	No	Yes
	Org.	Homes England	Site					
	Agent							
D20.3	Rep'r	Mrs Julie Buttle	Policy	Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments	Currently allotments are not available within a 15 minute drive of the rural area. Additionally, why has land for allotments not been allocated on the policy map - particularly at the Whittingham hospital site where allotments were originally requested by the Parish Council.	It is noted that there may be some rural areas of the Central Lancashire Plan area that are not within a 15 minutes drive of an existing allotment site. Policies HS5 and EN5 aim to retain and enhance the provision of allotment sites within the Plan area and it is considered that these policies will address this. Policy EN5 identifies EN5.1 – Land at Harrison's Farm, Adlington for new green infrastructure provision, including allotments, this can be seen on the Policies Map within the Green Infrastructure layer.	No	Yes
	Org.	Whittingham Parish Council	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D25.5	Rep'r	Mr Richard Sewell	Policy	Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments	Concerned that the playing pitch element of the policy is not based on an up-to-date evidence base. The Central Lancashire Playing Pitch Strategy was produced in June 2012 and updated in September 2018 with a further Stage E report being prepared in 2021. Therefore, a new Playing Pitch Strategy is required to update the 2018 study to understand and inform sports development and planning policy issues. It is understood that Central Lancashire is in the process of producing a new PPS, but the current position is that this piece of work is only at Stage B at the PPS process and that the finalised strategy is not timetabled until December 2025 at the earliest. It is not considered that the emerging PPS is suitably progressed to be included within the draft Local Plan policies listed above.	It is considered that the evidence base supporting the Plan policies regarding Open Space & Playing Pitches is robust, and it should also be noted that the playing pitch evidence base and OSSRS are currently being updated. These will be the basis for OS assessments once adopted.	No	No
	Org.	Sport England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HS6: Housing Mix and Density				Count of Representations against this policy/section: 18		
A08.01	Rep'r Applethwaite Ltd Org. Applethwaite Ltd Agent Mr Graham Love	Policy Policy HS6: Housing Mix and Density Site	A requirement to provide a mix of dwelling types and sizes is too generic and open-ended to achieve meaningful provision to meet a diverse range of retired and older people's housing needs. This reflects the Housing Needs and Demand Assessments evidence base which does not provide a sufficiently segmented understanding of needs as recommended by the Older People's Housing Taskforce. Reliance on a 'one size fits all' approach of requiring all new dwellings to be built to the Part M4(2) Accessible and Adaptable Homes standard will not meet a diverse range of retired and older people's housing needs. It is also not clear that this measure can be guaranteed to meet needs in the absence of a requirement to impose an over-55 age restriction on a sufficient number of Part M4(2) dwellings, as they will be marketed as general needs housing and will not be reserved (and in perpetuity) exclusively for occupation solely by older people.	The Housing Need and Demand Assessments provide robust evidence in terms of housing needs. They have been prepared in accordance with NPPF which requires local planning authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect these in planning policies. Policy HS6 requires housing developments to provide a mix of housing to meet the needs identified in the HNDAs. The HNDAs also provide evidence to justify the requirement for all dwellings to be built to M4(2) standard. Furthermore, the government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes.	No	Yes
A12.6	Rep'r Tallentine Org. Tallentine Agent Mr Jonathan Ainley	Policy Policy HS6: Housing Mix and Density Site	Flexibility should be applied in terms of the housing mix and accessibility standards requirements to ensure that site specific issues can be responded to otherwise this may impact on deliverability. Modifications to criterion 1 are suggested to make the policy more flexible, allowing divergence from the	It is considered that sufficient flexibility is provided in the policy in relation to housing mix as the requirements are set as ranges. Furthermore paragraph 4.41 allows for a different mix to that required by the policy if it can be evidenced that there are site specific considerations that justify an alternative	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			required mix and accessibility standards where site specific characteristics justify it, and to allow evidence other than the Housing Need and Demand Assessments to be used as a starting point to determine the mix.	mix. It also takes into consideration the impact of the housing mix requirements on viability and states that where a different mix is proposed on viability grounds, a viability assessment must be submitted alongside the planning application, demonstrating that the required mix would make the development unviable. The policy does not include any flexibility in relation to the accessibility standards. The government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes. The M4(3) standards only apply to a small number of properties. NPPF paragraph 59 allows for a viability assessment to be submitted at the planning application stage if there are particular circumstances that would result in policy requirements making a development unviable. Disagree that the policy should allow alternative evidence to be used as a starting point to justify the mix within a development. The Housing Need and Demand Assessments provide a robust assessment of the housing type and size mix needs within Central Lancashire, they should therefore be used as the starting point for determining the housing type and size mix in developments. Where there are site specific considerations that justify an alternative mix, alternative evidence should be submitted alongside the planning application demonstrating this.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A19	Rep'r	Ms Rosie Tunnadine	Policy	Policy HS6: Housing Mix and Density	Habinteg considers paragraph 1 of policy 'HS6: Housing Mix and Density' to not go far enough to provide legal protections for older people and wheelchair users, falling short of the standards set by the Equality Act 2010. Hence, Habinteg recommends that all market and affordable housing developments of all sizes must meet Building Regulations M4 Category 2 accessible and adaptable standard to meet the needs of disabled and older people in Central Lancashire. Moreover, Habinteg recommends that at least 10% of all new homes meet Part M4(3) Standard (wheelchair user dwelling). Central Lancashire has an opportunity to be more ambitious in supporting disabled and older residents and Habinteg believe paragraph 1 policy 'HS6: Housing Mix and Density' could do more to positively impact the economic and social value of homes for wheelchair users.	Policy HS6 requires all dwellings on developments of 10 or more dwellings, or on sites of 0.4ha or greater to be built to the optional M4(2) standard. Disagree that all developments below these thresholds should also be built to M4(2) standard as this requirement would likely impact the viability of small scale developments. PPG states that Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. This implies that the standard can only be applied to affordable dwellings, as those are the only properties that the Council is responsible for allocating or nominating a person to live in. As such Policy HS6 only requires M4(3) standards in affordable dwellings. The proportion of affordable dwellings to be built to M4(3) standard is based on the recommendations of the Housing Need and Demand Assessments that form part of the evidence base for the Local Plan. These recommendations are based on robust evidence.	No	No
	Org.	Habinteg	Site					
	Agent							
A24.5	Rep'r	Mrs Joanne Harding	Policy	Policy HS6: Housing Mix and Density	The HBF is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is	It is considered that sufficient flexibility is provided in relation to the housing mix requirements as they are set as ranges. Furthermore paragraph 4.41	No	Yes
	Org.	Home Builders Federation	Site					

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent		workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements, requiring a mix that does not consider the scale of the site, does not consider the viability of the site, or requires the applicant to provide significant amounts of additional evidence. The HBF would expect the Council to ensure that the policy is applied flexibly and makes allowance for home builders to provide alternative housing mixes as is required by the market. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. It is incumbent on the Councils to provide a local assessment evidencing the specific case for Central Lancashire which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. The PPG also identifies other requirements for the policy including the need to consider site specific factors. If the policy is to be retained, it will need to be amended to include these considerations. The HBF is concerned about the significant additional cost of providing M4(3) wheelchair accessible homes and recommends that the Council amend the	allows for a different mix to that required by the policy if it can be evidenced that there are site specific considerations that justify an alternative mix. It also takes into consideration the impact of the policy on viability and states that where a different mix is proposed on viability grounds, a viability assessment must be submitted alongside the planning application, demonstrating that the required mix would make the development unviable. A Housing Need and Demand Assessment has been prepared for each of the three Central Lancashire authorities which form part of the evidence base for the Local Plan. These assessments provide evidence to justify the inclusion of the optional standards, in accordance with PPG. The Viability Report assesses the viability impact of Policy HS6. It identifies the associated costs of meeting M4(2) and M4(3) requirements but does not identify that this policy alone will make developments unviable. Disagree that the policy needs to be amended to include the specific considerations included in PPG. Disagree that the requirement for M4(3) dwellings in criterion c) of the policy should be removed. The requirements are based on robust evidence set out in the Housing Need and Demand Assessments. Regarding the viability impact of these requirements, it is acknowledged that the Viability Report identifies significant costs associated		

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					policy to remove this requirement. It is also noted that M4(3)(b) homes are not always attractive to buyers or residents and inevitably require further adaptations to suit the individual needs. The Viability Report (Feb. 2025) identifies this has a cost implication for development. The HBF supports the efficient use of land and understands the inclusion of a density policy. The HBF considers that the inclusion of a level of flexibility to take account of site-specific circumstances is appropriate. The HBF considers that it is important to ensure that the density requirements do not compromise the delivery of homes in sustainable locations to meet local needs. The Council will need to ensure that consideration is given to the full range of policy requirements as well as the density of development.	with achieving this standard however only a small proportion of dwellings are required to meet this standard. NPPF paragraph 59 allows for a viability assessment to be submitted at the planning application stage if there are particular circumstances that would result in policy requirements making a development unviable. Note the support for the density requirements. Planning applications will be considered against all the relevant policies in the plan.		
A38.4	Rep'r Org. Agent	Taylor Wimpey UK Limited Taylor Wimpey UK Limited Ms Alexandra Gavi	Policy Site	Policy HS6: Housing Mix and Density	Taylor Wimpey considers that flexibility should be provided for within the policy by presenting the required mix as a range to allow site-specific considerations to be accounted for. It is important that site specific considerations are taken into account, including viability and market demand, when considering a site's proposed housing mix, as long as it is in broad alignment with the recommendations in the Housing Need and Demand Assessments. Whilst Taylor Wimpey is committed to delivering homes to an M4(2) accessible	It is considered that sufficient flexibility is provided in the policy in relation to the housing mix requirements as they are set as ranges. Furthermore paragraph 4.41 allows for a different mix to that required by the policy if it can be evidenced that there are site specific considerations that justify an alternative mix. It also takes into consideration the impact of the policy on viability and states that where a different mix is proposed on viability grounds, a viability assessment must be submitted alongside the planning application, demonstrating that the	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					and adaptable standard, a deliverability appraisal should be undertaken by the Council to assess the implications of this policy requirement, before enforcing that development 'must' meet the requirements included within the policy. In its current form, the proposed wording regarding densities does not provide enough flexibility to account for the reduction in gross to net developable area as a result of a series of legal and national planning policy changes, including the statutory requirement to provide 10% in biodiversity net gain. This policy should be amended to include minimum net densities, so that it is sufficiently flexible for sites on which large parts are not developable.	required mix would make the development unviable. The Viability Report assesses the viability impact of Policy HS6. It identifies the associated costs of meeting M4(2) requirements but does not identify that this policy alone will make developments unviable. Furthermore, the government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes. NPPF paragraph 59 allows for a viability assessment to be submitted at the planning application stage if there are particular circumstances that would result in policy requirements making a development unviable. Sufficient flexibility is provided regarding the density requirements of Policy HS6. Criterion 4 allows for lower densities to be provided where they are clearly justified, for example to avoid harm to the character or appearance of an area, where there are constraints on a site, or where there are viability issues. On-site BNG provision may be one factor that justifies a lower density. Gross density requirements are used to avoid the unnecessary complexity of analysing net densities.		
A39.6	Rep'r	Castle Green Homes	Policy	Policy HS6: Housing Mix and Density	Castle Green is generally supportive of providing a range and choice of homes to meet the needs of the local area. However, it is considered that there is a	It is considered that sufficient flexibility is provided in relation to the housing mix requirements as they are set as ranges. Furthermore paragraph 4.41	No	Yes
	Org.	Castle Green Homes	Site					

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent Mrs Kerry Walker		need to apply a flexible approach to the provision of housing. It should be recognised that the required mix, size, and tenure of homes will differ by location. There is no flexibility in the M4(2) requirement. The policy also goes on to require 4% of new homes in Chorley to be wheelchair accessible in accordance with Part M4(3a). The PPG identifies the type of evidence required to introduce a policy requiring the M4 standards including the likely future need; the size, location, type, and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It also identifies other requirements including the need to consider site specific factors. Castle Green consider that the Council has not yet provided sufficient evidence for this policy to be considered justified or consistent with national policy. The density should only be used as a guide for development and the Council should be flexible in their use to take account of individual site characteristics, the development proposed and also viability. The evidence base for these figures was developed in 2022, is on a gross basis and does not take into any account the implications of biodiversity net gain, or the Councils' expectation of M4(2) and (3) properties on sites. This is pertinent as some of the Councils' proposed allocations, such as Little Knowley, do not appear to adhere to	allows for a different mix to that required by the policy if it can be evidenced that there are site specific considerations that justify an alternative mix. It also takes into consideration the impact of the policy on viability and states that where a different mix is proposed on viability grounds, a viability assessment must be submitted alongside the planning application, demonstrating that the required mix would make the development unviable. A Housing Need and Demand Assessment has been prepared for each of the three Central Lancashire authorities which form part of the evidence base for the Local Plan. These assessments provide evidence to justify the inclusion of the optional standards, in accordance with PPG. The Viability Report assesses the viability impact of Policy HS6. It identifies the associated costs of meeting M4(2) requirements but does not identify that this policy alone will make developments unviable. The policy does not include any flexibility in relation to the accessibility standards. The government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes. The M4(3) standards only apply to a small number of properties. NPPF paragraph 59 allows for a viability assessment to be submitted at the planning application stage if there are particular circumstances that would result in policy requirements making a		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			these density requirements.	development unviable. Sufficient flexibility is provided regarding the density requirements of Policy HS6. Criterion 4 allows for lower densities to be provided where they are clearly justified, for example to avoid harm to the character or appearance of an area, where there are constraints on a site, or where there are viability issues. On-site BNG provision may be one factor that justifies a lower density. When determining the number of dwellings on each housing allocation, site specific constraints were taken into consideration, therefore some allocations have a density lower than the minimum density required by Policy HS6.		
A41.6	Rep'r Rowland Homes Limited Org. Rowland Homes Limited Agent Mr Brian O Connor	Policy Policy HS6: Housing Mix and Density Site	Rowland has concerns with the market mix ranges provided at table D6 - D8 of Central Lancashire's three HNDAs and considers that additional flexibility should be provided within the Policy by presenting the mix as wider ranges which allows site-specific considerations to be taken into account. This will ensure that future development responds to the specific needs of a local area. Rowland is supportive of supporting policy paragraph 4.41 but consider that site specific considerations should be made reference to in the policy wording itself to make this clearer. Rowland considers that a blanket requirement for all properties to be built	It is considered that sufficient flexibility is provided in relation to housing mix requirements as they are set as ranges. Furthermore paragraph 4.41 allows for a different mix to that required by the policy if it can be evidenced that there are site specific considerations that justify an alternative mix. It also takes into consideration the impact of the policy on viability and states that where a different mix is proposed on viability grounds, a viability assessment must be submitted alongside the planning application, demonstrating that the required mix would make the development unviable. The Housing Need and Demand	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			to M4(2) standard is not justified. The three HNDAs recommend that all new affordable and market dwellings are to be built to M4(2) 'where possible'. This recommendation has not been reflected in the wording of part b of Policy. Rowland and other housebuilders often provide a number of 2-3 storey apartments on development sites to accommodate smaller units and ensure that the policy mix is met. In these instances, it is not economically viable to provide lifts in 2-3 storey apartment blocks and as such, a degree of flexibility is required in this policy. There are higher costs associated with providing flats at M4(2) standard than houses as identified in the Viability Report. A lower requirement or flexibility in the wording should therefore be provided.	Assessments provide evidence to justify the inclusion of the optional standards, in accordance with PPG. They provide up to date evidence in terms of housing needs. The Viability Report assesses the viability impact of Policy HS6. It identifies the associated costs of meeting M4(2) and M4(3) requirements but does not identify that this policy alone will make developments unviable. The policy does not include any flexibility in relation to the accessibility standards. The government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes. The M4(3) standards only apply to a small number of properties. NPPF paragraph 59 allows for a viability assessment to be submitted at the planning application stage if there are particular circumstances that would result in policy requirements making a development unviable.		
A45.7	Rep'r Taylor Wimpey UK Limited Org. Taylor Wimpey UK Limited Agent Megan Wilson	Policy Policy HS6: Housing Mix and Density Site	Although we endorse the need for a variety of sizes, types, and tenures, and support offering a range of homes to suit the needs of the surrounding area, Policy HS6 must, however, be practical and guarantee that the provision of housing will not be restricted or delayed by unduly restrictive requirements, such as requiring a mix that ignores the site's size or viability or that necessitates the applicant to prepare substantial amount of extra evidence. We would anticipate that additional flexibility can be	It is considered that sufficient flexibility is provided in relation to the housing mix requirements as they are set as ranges. Furthermore paragraph 4.41 allows for a different mix to that required by the policy if it can be evidenced that there are site specific considerations that justify an alternative mix. It also takes into consideration the impact of the policy on viability and states that where a different mix is proposed on viability grounds, a viability assessment must be submitted	No	Yes

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			established within the policy so as to allow for assessment on a site-by-site basis. Furthermore, the Council should refer to the PPG's criteria if it wants to adopt the higher optional standards for wheelchair-accessible, adaptable, and accessible dwellings. The PPG identifies particular evidence as being necessary to introduce a policy requiring the M4 standards. In order to support the inclusion of optionally higher standards for accessible and adaptable dwellings in the CLLP the Councils are required to present a local assessment that demonstrates the particular need for Central Lancashire. Impact on the viability of sites should also be given consideration, with the February 2025 Viability Report already suggesting within Chapter 6 that a number of types of development, particularly Brownfield development is already considered unviable. We suggest that where reference is made within the draft policy to a minimum density, additional flexibility is established within the policy and any density is set per net hectare as opposed to per gross hectare. It is important to note that housing mix as identified in the Councils latest evidence base will only provide a snapshot in time in relation to the current housing needs. As such, the policy should provide for flexibility going forward so that the Plan is able to respond to changes in circumstances at	alongside the planning application, demonstrating that the required mix would make the development unviable. A Housing Need and Demand Assessment has been prepared for each of the three Central Lancashire authorities which form part of the evidence base for the Local Plan. These assessments provide evidence to justify the inclusion of the optional standards, in accordance with PPG. They provide up to date evidence in terms of housing needs. The Viability Report assesses the viability impact of Policy HS6. It identifies the associated costs of meeting M4(2) and M4(3) requirements but does not identify that this policy alone will make developments unviable. The policy does not include any flexibility in relation to the accessibility standards. The government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes. The M4(3) standards only apply to a small number of properties. NPPF paragraph 59 allows for a viability assessment to be submitted at the planning application stage if there are particular circumstances that would result in policy requirements making a development unviable. Sufficient flexibility is provided regarding the density requirements of Policy HS6. Criterion 4 allows for lower densities to be provided where they are clearly justified, for example to avoid		

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					the time of an application being submitted to the Local Planning authority so that development opportunities can make better use of the land available whilst responding to the housing needs at that time.	harm to the character or appearance of an area, where there are constraints on a site, or where there are viability issues. On-site BNG provision may be one factor that justifies a lower density. Gross density requirements are used to avoid the unnecessary complexity of analysing net densities.		
A60.6	Rep'r	Ms Ashleigh Genco	Policy	Policy HS6: Housing Mix and Density	The policy as drafted provides for too rigid an approach with the 'need' for dwellings being tied to the HNDA which provides only a snapshot in time, is based primarily on historic trends and existing housing stock and is underpinned by a demographic scenario model which takes account of projected household change using 2018-based ONS household projections. Whilst acknowledging they are the most recently available ONS data, such projections are derived from a pre-Covid environment; since which time there have been significant changes in work-place trends in favour of home working which has resulted in increased demand for larger properties, to accommodate home-office space, therefore there is an increasing demand for larger house types, with a clear need for more 4+ bedroom housing in this location. We strongly encourage flexibility in the wording of this policy to ensure the delivery of a housing mix which is aligned to market factors. The market is best placed to offer a mix of dwelling types and sizes to address the needs for that location. We consider that the case for M4(2) and	It is considered that sufficient flexibility is provided in relation to the housing mix requirements as they are set as ranges. Furthermore paragraph 4.41 allows for a different mix to that required by the policy if it can be evidenced that there are site specific considerations that justify an alternative mix. It also takes into consideration the impact of the policy on viability and states that where a different mix is proposed on viability grounds, a viability assessment must be submitted alongside the planning application, demonstrating that the required mix would make the development unviable. The HNDAs provide robust evidence in relation to housing needs across Central Lancashire therefore the recommendations are considered justified. Furthermore, the government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes. Disagree that the higher minimum density requirement in Preston City Centre will preclude delivery of homes	No	Yes
	Org.	Story Homes	Site					
	Agent	Mr Dan Mitchell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			M4(3) homes has been overstated within the evidence base and therefore within Policy HS6. The recommendation in the HNDA for M4(3) homes doesn't appear to include an assessment of need within Chorley and should be discounted. The HNDA appears to lack any detailed analysis of household requirement which justifies the blanket application of the optional M4(2) standard; beyond there being a generally aging population. We do not consider that there is sufficient evidence to justify such a policy approach and this element of the Policy should be deleted. Whilst we support the identification of minimum housing densities and the flexibility that is provided as to when lower densities will be permitted, it is essential that the focus on higher density development in Preston City Centre does not preclude the delivery of much-needed homes in sustainable locations, where such need is arising, across the entirety of the plan area. We recommend that the Council should amend its proposed minimum density standards to a level which is not at the expense of good design and that will lead to over-development and urban intensification.	in other locations. It reflects the level of high rise developments that have been built and will continue to be built in Preston City Centre to maximise the use of land in those locations.		
A61.6	Rep'r Mr Rob Haslam Org. Harworth Estates Agent Mr Brian O Connor	Policy Policy HS6: Housing Mix and Density Site	Harworth has concerns regarding the market mix ranges presented and considers that additional flexibility should be provided within the Policy by presenting the mix as wider ranges which allows for site-specific considerations to be taken into account, as well as changes	It is considered that sufficient flexibility is provided in relation to the housing mix requirements as they are set as ranges. Furthermore paragraph 4.41 allows for a different mix to that required by the policy if it can be evidenced that there are site specific	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			to market factors which may influence need and demand in future. Harworth is supportive of providing housing for people with additional needs but considers that a blanket requirement for all properties to be built to an M4(2) standard is not justified or appropriate. It is not clear how the assumptions in the HNDAs have been quantified, and there is no clear evidence as to how this requirement has been derived. Furthermore, the PPG makes reference to a number of factors that can be taken into account when evidencing a need to set higher adoptable standards. Of the factors referred in the PPG, Harworth does not consider that the potential viability impact has been fully considered in the formulation of Policy HS6. Requiring all dwellings to be M4(2) compliant across the site will have significant cost implications and must be appropriately factored into viability assumptions and the overall site appraisal. Developers may provide a number of 2-3 storey apartments on development sites to accommodate smaller units and ensure that the required policy mix can be met. In these instances, it is not practical or viable to provide lifts to upper floors in 2-3 storey apartment blocks and as such, a degree of flexibility is required in this policy rather than a prescriptive requirement on all dwellings. Harworth objects to the minimum densities set out in the policy as it is concerned that these gross densities will	considerations that justify an alternative mix. It also takes into consideration the impact of the policy on viability and states that where a different mix is proposed on viability grounds, a viability assessment must be submitted alongside the planning application, demonstrating that the required mix would make the development unviable. The Housing Need and Demand Assessments provide robust evidence to justify the inclusion of the optional standards, in accordance with PPG. The Viability Report assesses the viability impact of Policy HS6. It identifies the associated costs of meeting M4(2) requirements but does not identify that this policy alone will make developments unviable. The policy does not include any flexibility in relation to the accessibility standards. The government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes. The M4(3) standards only apply to a small number of properties. NPPF paragraph 59 allows for a viability assessment to be submitted at the planning application stage if there are particular circumstances that would result in policy requirements making a development unviable. Sufficient flexibility is provided regarding the density requirements of Policy HS6. Criterion 4 allows for lower densities to be provided where they are		

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					be too high in some locations. The policy must consider the gross to net conversion based on the developable area of the site and should therefore be reduced accordingly, with the requirements based on net developable area to account for site constraints, policy requirements and any supporting infrastructure such as roads or community uses. Flexibility must also be incorporated into the policy to allow for higher densities where it is considered appropriate based on site context and site specific considerations.	clearly justified, for example to avoid harm to the character or appearance of an area, where there are constraints on a site, or where there are viability issues. Gross density requirements are used to avoid the unnecessary complexity of analysing net densities.		
A63.10	Rep'r	PWA Planning	Policy	Policy HS6: Housing Mix and Density	Policy HS6 does not contain an explicit viability clause for accessibility standards. If a development struggles to accommodate M4(2) or M4(3) homes due to design constraints or viability, there is no clear mechanism for flexibility.	The policy does not include any flexibility in relation to the accessibility standards. The government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes. The M4(3) standards only apply to a small number of properties. NPPF paragraph 59 allows for a viability assessment to be submitted at the planning application stage if there are particular circumstances that would result in policy requirements making a development unviable.	No	Yes
	Org.	PWA Planning	Site					
	Agent	Mr Paul Walton						
A65.5	Rep'r	Bloor Homes Limited	Policy	Policy HS6: Housing Mix and Density	Bloor welcomes the inclusion of part 4 of Policy HS6, which permits lower densities where it can be demonstrated that there are specific constraints that reduce the developable area. It would however be much more appropriate to set minimum densities on net developable area to account for site constraints, and policy	Gross density requirements are used to avoid the unnecessary complexity of analysing net densities. The Viability Report assesses the viability impact of Policy HS6. It identifies the associated costs of meeting M4(2) requirements but does	No	Yes
	Org.	Bloor Homes Limited	Site					
	Agent	Mr Harry Russell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			and legal requirements. Whilst Bloor is committed to delivering homes to an accessible and adaptable standard this is not always possible. For example, on certain sites, it is prudent to deliver part of the affordable housing units in apartment blocks of 2-3 storeys particularly to accommodate smaller units. However, to meet accessibility standards for upper floors of apartment blocks would require lifts to be installed in all blocks. This is impracticable and unviable for 2-3 storey residential apartment blocks and a degree of flexibility in the policy is required. A deliverability appraisal should be undertaken to assess the implications of this policy requirement, including on viability. A caveat may need to be added to reduce the requirement for M4(2) compliance if it can be demonstrated that it is not viable.	not identify that this policy alone will make developments unviable. The policy does not include any flexibility in relation to the accessibility standards. The government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes. The M4(3) standards only apply to a small number of properties. NPPF paragraph 59 allows for a viability assessment to be submitted at the planning application stage if there are particular circumstances that would result in policy requirements making a development unviable.		
A67.6	Rep'r L&Q Org. L&Q Agent Mr Phil Robinson	Policy Site	Policy HS6: Housing Mix and Density	L&Q are generally supportive of providing a range and choice of homes to meet local needs but it is considered that there is a need to apply a flexible approach to the provision of housing. It should be recognised that the required mix, size, and tenure of homes will differ by location. There is no flexibility in the requirement to meet M4(2) standards. The PPG identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type, and quality	It is considered that sufficient flexibility is provided in relation to the housing mix requirements as they are set as ranges. Furthermore paragraph 4.41 allows for a different mix to that required by the policy if it can be evidenced that there are site specific considerations that justify an alternative mix. It also takes into consideration the impact of the policy on viability and states that where a different mix is proposed on viability grounds, a viability assessment must be submitted alongside the planning application, demonstrating that the required mix	No	Yes

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			of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It also identifies other requirements for the policy. L&Q consider that the Council have not yet provided sufficient evidence for this policy to be considered justified or consistent with national policy. L&Q recommend the density figures in the policy should only be used as a guide for development and the Council should be flexible in their use to take account of individual site characteristics, the development proposed and also viability. It also needs to be remembered that the evidence base for these figures was developed in 2022, so does not take into any account the implications biodiversity net gain, or the Council expectation of M4(2) and (3) properties on sites.	would make the development unviable. A Housing Need and Demand Assessment has been prepared for each of the three Central Lancashire authorities which form part of the evidence base for the Local Plan. These assessments provide evidence to justify the inclusion of the optional standards, in accordance with PPG. They provide up to date evidence in terms of housing needs. The Viability Report assesses the viability impact of Policy HS6. It identifies the associated costs of meeting M4(2) and M4(3) requirements but does not identify that this policy alone will make developments unviable. The policy does not include any flexibility in relation to the accessibility standards. The government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes. The M4(3) standards only apply to a small number of properties. NPPF paragraph 59 allows for a viability assessment to be submitted at the planning application stage if there are particular circumstances that would result in policy requirements making a development unviable. Sufficient flexibility is provided regarding the density requirements of Policy HS6. Criterion 4 allows for lower densities to be provided where they are clearly justified, for example to avoid harm to the character or appearance of an area, where there are constraints on		

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						a site, or where there are viability issues. On-site BNG provision may be one factor that justifies a lower density.		
D02.18	Rep'r	Emily Hrycan	Policy	Policy HS6: Housing Mix and Density	The Policy and the supporting text needs to provide a more balanced approach to new housing density and provide emphasis on setting minimum requirements. As drafted it does not mention the impact on heritage assets. It also suggests that lower densities will be permitted where it can be demonstrated that it would cause harm to an area. Development normally requires maximising development of a site. The lower density need is a requirement where it demonstrates the harm rather than stating "permitted if it can justify". This would provide the LPA with comfort that they can request a lower density where there is any harm caused. As drafted it appears to suggest that these development densities are set and that any amendments would need clear justification and not compromise the overall delivery of homes in instances such as the character and appearance of an area and not the historic environment. Whilst the area has been divided up into typologies, this will not assist on a site which is within a conservation area or affecting the setting of a heritage asset, for example. The policy as drafted contradicts the requirements of the NPPF in which the starting point of any new development should be its location and what the local	The Councils note that the changes could improve the clarity of the policy but remain confident that the plan as drafted is sound. It is not considered necessary to add reference to the historic environment into the policy as Policy EN13 deals with the protection of the historic environment. The plan should be read as a whole.	No	No
	Org.	Historic England	Site					
	Agent							

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					natural, built and historic environment is like, including the setting of heritage assets further afield. This ensures that the density on the site will be appropriate and enhances its context – variations in density may be required in order to mitigate harm to heritage asset for example or to relate to local character.			
D04.09	Rep'r Org. Agent	Laura Marchant Homes England	Policy Site	Policy HS6: Housing Mix and Density	To ensure sustainable development can be brought forward, it should be clarified that a deviation from the mix proposed in the HNDAs does not require a financial viability assessment to be submitted, provided that other robust market evidence is submitted to justify the deviation.	Paragraph 4.41 states that a viability assessment is required if a different mix is proposed on viability grounds. It does not state that a viability assessment is required where there is evidence submitted justifying a deviation that does not relate to viability.	No	Yes
D11.5	Rep'r Org. Agent	Rebecca Housam Defence Infrastructure Organisation	Policy Site	Policy HS6: Housing Mix and Density	As currently drafted, the policy does not allow sufficient flexibility to account for the complexities of delivering a comprehensive redevelopment of a site which contains many designated heritage assets to be retained. The strict application of this policy as currently written would therefore serve to limit the deliverability of such sites. Amendments are suggested to add a reasonable amount of flexibility to allow the specific characteristics of sites to be reflected in the mix and accessibility standards, whilst maintaining the aim of the Policy overall. It may not be possible for repurposed designated heritage assets to fully meet the requirements of M4(2) and therefore the implementation of this policy may render such a project	It is considered that sufficient flexibility is provided in relation to the housing mix requirements as they are set as ranges. Furthermore paragraph 4.41 allows for a different mix to that required by the policy if it can be evidenced that there are site specific considerations that justify an alternative mix. It also takes into consideration the impact of the policy on viability and states that where a different mix is proposed on viability grounds, a viability assessment must be submitted alongside the planning application, demonstrating that the required mix would make the development unviable. The policy does not include any flexibility in relation to the accessibility	No	Yes

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					undeliverable.	standards. The government has stated its intention to mandate M4(2) requirements in Building Regulations as a minimum standard for all new homes. The M4(3) standards only apply to a small number of properties. NPPF paragraph 59 allows for a viability assessment to be submitted at the planning application stage if there are particular circumstances that would result in policy requirements making a development unviable.		
D12.7	Rep'r Org. Agent	Richard Sharples Lancashire County Council	Policy Site	Policy HS6: Housing Mix and Density	Public Health support the requirement for all dwellings to be built to M4(2) accessible standard, unless they are built to M4(3) wheelchair accessible standard. Aligned to the Public Health Advisory Note – Adaptable M4(2) Homes, we recommend that policy HS6 is amended so that it is not limited to housing developments of 10 dwellings or more or sites of 0.4 hectares or greater. This would ensure fair and equal access to accessible and adaptable housing in the future.	Support noted. It is not considered appropriate to require developments below the threshold to also meet the optional housing standards as this would likely impact the viability of small scale developments.	No	No
D20.4	Rep'r Org. Agent	Mrs Julie Buttle Whittingham Parish Council	Policy Site	Policy HS6: Housing Mix and Density	The Parish Council supports the inclusion of a policy to ensure 4% of affordable dwellings are built to include wheelchair access but it seems a low figure and it is questioned how the figure was determined and if it can be increased.	The requirements for M4(3) standards are based on the recommendations within the Housing Need and Demand Assessments which provide robust evidence of housing need across Central Lancashire.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)			Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HS7: Affordable Housing						Count of Representations against this policy/section:		18
A18.3	Rep'r	Mr Terry Cooper	Policy	Policy HS7: Affordable Housing	The housing figure for Chorley will fail to deliver the required level of affordable housing and this shortfall can only be addressed by adopting the current standard method figure for Chorley as the housing requirement. Using the 564 figure, a policy compliant 30% affordable housing delivery rate would equate to 169 affordable homes per annum which aligns with the needs that have been identified in the Chorley HNDA (162).	The delivery of affordable housing across the CLLP area will be achieved by a mix of developer contributions on mixed market sites and also 100% affordable developments, the latter of which will be identified as the Local Plan progresses through and post adoption. It is expected that this mix of approaches (and not a sole reliance on the 30% requirement figure in Policy HS7) will satisfy the annual affordable housing requirement.	No	Yes
	Org.	Private Individual	Site					
	Agent	Soulla Rose						
A23.2	Rep'r	McCarthy Stone / Churchill	Policy	Policy HS7: Affordable Housing	The policy doesn't adequately address viability constraints regarding Affordable Housing on specialist needs proposals, specifically Older Persons Housing. Proposed additional point to policy: "Schemes delivering housing for older people are exempt from delivering affordable housing."	HS7 includes provisions for circumstances where there are viability challenges on a development proposal. Older persons housing is not necessarily less viable than other forms of specialist private sector housing and whilst there may be situations where an onsite affordable housing contribution is not appropriate or feasible, that does not negate the need for a contribution which can be a commuted sum. For such situations there are provisions within the policy.	No	Yes
	Org.	McCarthy Stone/Churchill	Site					
	Agent	Ms Jane Vlach						
A24.6	Rep'r	Mrs Joanne Harding	Policy	Policy HS7: Affordable Housing	The HBF is concerned that the Plan will not meet the affordable housing need as set out in the HDNA, and also notes the viability challenges within the Viability Report. The Council should consider increasing the housing requirement to help to address this need and also look	The delivery of affordable housing across the CLLP area will be achieved by a mix of developer contributions on mixed market sites and also 100% affordable developments, the latter of which will be identified as the Local Plan progresses through and post adoption.	No	Yes
	Org.	Home Builders Federation	Site					
	Agent							

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					again at the Plan and spatial strategy, for example, if more sites were allocated in areas where the viability is greater, this would help to increase the level of affordable housing provided.	It is expected that this mix of approaches (and not a sole reliance on the 30% requirement figure in Policy HS7) will satisfy the annual affordable housing requirement. The distribution of the dwellings across the CLLP area is considered appropriate and complies with the findings of the HDNA.		
A38.5	Rep'r Org. Agent	Taylor Wimpey UK Limited Taylor Wimpey UK Limited Ms Alexandra Gavi	Policy Site	Policy HS7: Affordable Housing	Taylor Wimpey welcomes the flexibility to provide an alternative tenure split if it can be independently proven, this policy would benefit from a required range, rather than specific percentages, to provide reasonable flexibility and allow site specific considerations to be accounted for.	Using percentage requirements for Affordable Housing tenure splits is an established Planning Policy requirement and is supported by the various HDNAs for the CLLP. It is therefore considered that policy HS7 is sound.	No	Yes
A39.7	Rep'r Org. Agent	Castle Green Homes Castle Green Homes Mrs Kerry Walker	Policy Site	Policy HS7: Affordable Housing	The housing figure for Chorley will fail to deliver the required level of affordable housing and as such it should be increased. The exact supply of dwellings and their trajectory is requested to be provided for further scrutiny at Examination. There are significant viability challenges evidenced, and it is unrealistic to negotiate viability on every site on a one-by-one basis because the baseline aspiration of a policy /policies is set too high. The Registered Provider Framework has not been subject to scrutiny nor is it	The delivery of affordable housing across the CLLP area will be achieved by a mix of developer contributions on mixed market sites and also 100% affordable developments, the latter of which will be identified as the Local Plan progresses through and post adoption. It is expected that this mix of approaches (and not a sole reliance on the 30% requirement figure in Policy HS7) will satisfy the annual affordable housing requirement.	No	Yes

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			evidenced it is necessary or justified. Object to criterion 17 of the policy regarding the 20% supplement. This figure is not justified by evidence and presents a significant cost which is not considered proportionate to its intended administrative use. It also raises viability concerns.	The council(s)choosing to introduce a Registered Provider framework will undertake a process of consultation and appropriate integrated equality impact assessment prior to the adoption of such a policy. The 20% supplement will finance the administration of the commuted sum, including developing a capital programme for affordable housing delivery. Other Councils have implemented similar policies (e.g. Calderdale MBC). An affordable housing topic paper will be prepared to provide more context. The Councils consider the policy is sound, justified and positively prepared.		
A41.7	Rep'r Rowland Homes Limited Org. Rowland Homes Limited Agent Mr Brian O Connor	Policy Policy HS7: Affordable Housing Site	Affordable housing tenure split for Chorley differs to that of Preston and South Ribble & is unclear what evidence led to exclusion of affordable rent from Chorley's' policy. The affordable tenure mix has not been fully considered in terms of viability. 20% supplement on affordable housing commuted sums is not proportionate or reasonable and does not reflect cost of monitoring and is not in line with PPG or the CIL tests.	Social rent as preferred tenure option The policy approach taken is informed by the 2024 Housing Needs and Demand Study which states "The recommended affordable housing tenure split is 47% social rent, 24% affordable rent and 29% affordable home ownership" (page 9). This is a recommendation only and has informed the policy position which from a housing need perspective, does not represent a deviation from or reduction in meeting	No	Yes

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				identified need. Affordable rent tenures increasingly exceed local housing allowance rate therefore can be unaffordable to those on very low incomes. In Chorley, the average market rent is £872 per month, compared to an average affordable rent of £621 and an average social rent of £374 (Chorley HDNA Table 3.9). While Local Housing Allowance (LHA) rates may cover affordable rent for smaller properties, they fall short for larger homes. For example: A household requiring a 3-bedroom property receives £572.94 in LHA (April 2023), which falls below the average affordable rent (£621 in 2023). This amount falls significantly short in higher-cost sub-areas, such as Abbey Village, Brinscall and Charnock Richard, where affordable rental prices typically exceed the LHA threshold. Table 3.6 Page 66 of the 2024 Housing Needs and Demand Study summarises lower quartile rents, the LHA for the area Broad Rental Market Area (BRMA), and the variance between lower quartile rents and the LHA. This deficit reinforces the need for more social rented homes, as even affordable rent may be out of reach for benefit-dependent households. The disparity between the LHA, market and affordable rents has resulted in a		

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				tenure split towards social rented. While the requirement for social rented homes is based on the evidence in the Housing Needs Assessment completed prior to the NPPF 2024, it reflects the emphasis placed on this tenure at paragraphs 63 and 64 of the NPPF 2024, as well as Home England's preference for social rented homes. The delivery of social rented housing remains disproportionately low and does not align with the identified need in the Chorley HDNA. It is therefore essential that future policy places greater emphasis on meeting the demand for social housing within the overall affordable housing requirement. Furthermore, Chorley Council's Tenancy Strategy (2012) outlines the Council's commitment to maintaining social rent as the preferred tenure for affordable housing. Specifically it states that: Existing social rent properties that have received funding through grants, developer contributions, or Council capital investment are expected to remain as social rent and not be converted to affordable rent. New social housing developments supported by developer or Council contributions are also expected to be delivered as social rent tenure, rather than affordable rent. This approach reflects the Council's priority to ensure genuinely affordable		

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				housing options for residents. A topic paper for Affordable Housing will be published in due course which further explains the rationale for this policy approach. Viability HS7 includes provisions for circumstances where there are viability challenges on a development proposal. Commuted sum calculation It should first be noted that the 20% supplement regarding commuted sum payments is in addition to the monitoring and administration fee. Where off-site provision is proposed, the calculation of units or commuted sum should take into account the fact there is an increase in the market housing on the application site. For example, consider in simple terms a site accommodating 100 units, which would be 70 market houses and 30 affordable houses on site. If the Local Planning Authority permits all the site to be developed for market housing and still requires an on-site contribution of 30 units (or the financial equivalent thereof), it would only achieve 23% affordable housing. To achieve 30% affordable housing on a site of 100 units in an urban area (where the on-site provision would be 70 market and 30 affordable houses, and where the site is subsequently developed for 100 market		

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				houses), in order to maintain the overall ratio of 30% affordable housing to 70% market housing, the number of affordable housing units provided off-site has to be increased to 43. Consequently, the commuted sum calculation needs to incorporate this consideration. Furthermore, the supplement is intended to cover any additional charges that may be incurred by the Council during the process of applying commuted sum payments for the purposes of securing Affordable Housing e.g. land / property acquisition fees, planning / building control fees. The Councils consider that the policy complies with the statutory test set out in regulation 22 (as amended by the 2011 and 2019 Regulations) and as policy tests in NPPF.		
A45.8	Rep'r Taylor Wimpey UK Limited Org. Taylor Wimpey UK Limited Agent Megan Wilson	Policy Policy HS7: Affordable Housing Site	Affordable targets of 30%-35% seem high. Unclear what assumptions underpin the viability conclusions for viability. Seek flexibility in tenure splits. Concerns plan as proposed will not meet the affordable need. Councils to consider increasing number of allocations in more viable areas, including Green Belt. Proposing to deviate from the mix should not require a financial viability	Each viability model includes a heat map showing sensitivities regarding affordable housing. For each 5% increase the overall viability impact is not significant. There are more fundamental issues impacting overall viability, e.g. build costs, sales values, profit levels etc. The Councils are committed to making	No	Yes

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					assessment.	use of available brownfield land and the regeneration of urban areas and there is no reason to justify the release of Green Belt land as the needs are being met in full. There are provisions in the HS6 and HS7 policy which provide for circumstances where viability is an issue. The deviation from proposed mix will require verification and therefore financial assessment will be most likely required .		
A61.7	Rep'r Org. Agent	Mr Rob Haslam Harworth Estates Mr Brian O Connor	Policy Site	Policy HS7: Affordable Housing	Not clear what affordable housing requirement type/tenure split has been used to inform the Local Plan Viability Assessment. 20% supplement of the value of a commuted sum for affordable housing is not justified within the CLLP or evidence and is not proportionate, reasonable nor reflective of actual costs of monitoring.	The affordable housing requirement is supported by the Council's viability evidence (IT05). The general assumptions used can be found at para 3.8. Various combinations of tenure are modelled in Appendix 8. The 20% supplement will finance the administration of the commuted sum, including developing a capital programme for affordable housing delivery. Other Councils have implemented similar policies (e.g. Calderdale MBC).	No	Yes
A63.11	Rep'r Org. Agent	PWA Planning PWA Planning Mr Paul Walton	Policy Site	Policy HS7: Affordable Housing	Policy HS6 will impact on implementation of Policy HS7 and delivery of affordable housing. 100% affordable scheme delivery will not be possible with the policy as written. The policy requirements for a split of 75% rent and 25% shared ownership is not competitive.	HS7 policy includes provisions for circumstances where robust evidence supports either an alternative tenure split/ need (7) or where scheme not viable (5). The Councils do not agree that 100% affordable schemes will not be possible.	No	Yes

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				It is critical that delivery of all housing from market to affordable housing reflects the needs identified and not just those of the private market, including a range of sizes and types. It is essential that the housing land available is used to most appropriately meet local housing needs which includes addressing the quantum of social rented homes required for allocation to those applicants waiting on the Councils' housing register. Failure to do this will lead to longer waiting times for those owed a duty under part 6 of the Housing Act 1996 and can increase demand (and length of stay) for temporary and interim accommodation pending the discharge of that duty. This policy is positively prepared to deliver the right type and tenure on affordable homes needed, not purely quantum.		
A65.6	Rep'r Bloor Homes Limited Org. Bloor Homes Limited Agent Mr Harry Russell	Policy Policy HS7: Affordable Housing Site	There are inconsistencies between the methodologies used for each district. The report mistakenly includes current committed affordable housing supply on an annual basis, whereas they should have been netted off the current backlog need or excluded entirely. See Wirral examination.	The Preston Housing Need and Demand 2024, Chorley Housing Need and Demand 2024 and South Ribble Local Housing Need 2024 Assessments provide a range of evidence to underpin the Central Lancashire Local Plan. The Preston and Chorley studies were informed by primary household survey work and the South Ribble study focused on the use of secondary data. The availability of information to inform analysis was therefore slightly different for South Ribble.	No	Yes

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				The studies used available data to inform the assessment of affordable housing need and assumptions clearly stated through the reports. The reports identified a clear need for additional affordable housing to be delivered across Central Lancashire. There was some variation in outputs based on the data that were available.		
A67.7	Rep'r L&Q Org. L&Q Agent Mr Phil Robinson	Policy Site	Policy HS7: Affordable Housing	To deliver the gross affordable housing need of 728dpa, in excess of 50% of the housing requirement would be required. As presented the CLLP will not deliver the AH required. The locations where a reasonable amount of the housing allocations are identified as marginal or not viable. The RP framework has not been subject to scrutiny and is not justified by evidence. Removing the requirement for the RP framework will help to increase affordable housing provided. The 20% supplement on commuted sums is not justified by evidence and is not proportionate.	The delivery of affordable housing will be achieved by a mix of developer contributions on mixed market sites and also 100% affordable developments, the latter of which will be identified as the Local Plan progresses through and post adoption. The net annual affordable housing need per each Council as set out in the Local Housing Need Assessments prepared by ARC4 are 53 homes for Chorley, 130 homes in Preston and 146 homes in South Ribble, aggregated to 319 homes. The RP Framework is currently in place in Chorley only and has been subject to external consultation. A full review including external consultation will be undertaken independently of the Local Plan and subject to that, the Council(s) will determine if it should continue. The objectives of the RP are to facilitate delivery of affordable housing including ensuring allocations of new homes are to those on the Councils housing register as set out under Part 6 of The Housing Act 1996. A 20% supplement is	No	Yes

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						necessary on commuted sums to ensure there is no net loss associated with administering this funding, pursuant to delivering off-site affordable housing.		
B16	Rep'r	Miss Natalie Weatherill	Policy	Policy HS7: Affordable Housing	Representor considers policy to be 'sound' and legally compliant. No further detail given.	This is welcome	No	No
	Org.	Private Individual	Site					
	Agent							
B17	Rep'r	Marcus Fisher	Policy	Policy HS7: Affordable Housing	Suggests that the percentage requirement for Affordable Dwellings relates to floor area rather than the quantity of affordable units. There is scope for relatively low provision of affordable housing where the housing needs assessment identifies a local need for smaller homes. Prescribed tenure mix for 100% affordable sites will prevent some sites being deliverable. There is a need for flexibility. Vagueness and inflexibility of policies including where grant funding conditions apply and regarding off site developer contributions.	It is noted that a percentage requirement for Affordable Dwellings may result in a larger amount of floorspace on a site being available for open market dwellings, however, operationally a calculation per dwelling is common practice and considered a sound and justified approach. There are provisions within the policy which allow for alternative tenure splits where robustly supported by evidence of proven need. An affordable housing topic paper will be prepared which will provide more detail on the context around the policy.	No	No
	Org.	(Development Manager & Affordable Housing Consultant at Marcus Fisher Limited)	Site					
	Agent							
B48	Rep'r	Miss Wendy Molyneux	Policy	Policy HS7: Affordable Housing	There are not enough construction workers to build the houses contained in the trajectory. The Affordable Dwellings that are being built are not affordable to young people. Proposed modification to ensure developments are small-scale, affordable	The housing trajectory contained within the emerging CLLP is considered robust and based upon evidenced need. For a dwelling to be deemed "affordable" then it is required to meet the definitions as set out in the NPPF and PPG. The proposed modification is not considered necessary as the policies	No	No
	Org.	Private Individual	Site					
	Agent							

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					and not detrimental to the environment.	contained within the emerging Local Plan offer a range of development scales, a robust Affordable Housing policy and a number of policies committed to the protection of the natural environment.		
B49.01	Rep'r	Ms Jane Vlach (McCarthy Stone & Churchill Living)	Policy	Policy HS7: Affordable Housing	The policy doesn't adequately address viability constraints regarding Affordable Housing on specialist needs proposals, specifically Older Persons Housing. Proposed additional point to policy: "Schemes delivering housing for older people are exempt from delivering affordable housing."	HS7 includes provisions for circumstances where there are viability challenges on a development proposal. Older persons housing is not necessarily less viable than other forms of specialist private sector housing and whilst there may be situations where an onsite affordable housing contribution is not appropriate or feasible, that does not negate the need for a contribution which can be a commuted sum. For such situations there are provisions within the policy.	No	Yes
	Org.	McCarthy Stone and Churchill Living	Site					
	Agent							
B65.2	Rep'r	Messrs Rankin, Patel and Briggs	Policy	Policy HS7: Affordable Housing	Policy HS7 is not sound because the policy requiring 35% Affordable Housing for proposals within Tier 4 settlements does not give factor that developments would need to be of a reasonable scale to ensure viability. Proposed supporting text modification to give support to larger scale developments in Tier 4 settlements.	The Affordable Dwelling requirement in the policy is supported by the Council's viability evidence, which found that the policy would not preclude Affordable Housing delivery on Tier 4 sites.	No	Yes
	Org.	Private Individual	Site					
	Agent							
D04.10	Rep'r	Laura Marchant	Policy	Policy HS7: Affordable Housing	Homes England consider that there is a need for flexibility to ensure that the policy is effective.	It is considered that policy HS7 contains a number of points of flexibility, including points 2 and 5. This combined with the flexibility afforded by Policy HS6 means that the policy is adequately	No	Yes
	Org.	Homes England	Site					
	Agent							

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						adaptable and effective.		
D11.6	Rep'r	Rebecca Housam	Policy	Policy HS7: Affordable Housing	Viability work suggests flexibility may be required to ensure deliverability. Paragraph 35 of the NPPF sets out that contributions should not undermine the deliverability of the plan. Proposed amendments to include new paragraph 16 related to an appropriate methodology to follow when a development is considered financially unviable.	It is considered that paragraphs 2 and 5 of the policy already provide a suitable level of flexibility to the policy that address the concerns expressed by the representation.	No	Yes
	Org.	Defence Infrastructure Organisation	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HS8: Rural Exception Sites				Count of Representations against this policy/section: 4		
A32.7	Rep'r Mr Stephen Glenn Org. Northern Trust Land Ltd Agent Mr Alexis De Pol	Policy Policy HS8: Rural Exception Sites Site	The CLLP is not delivering the affordable housing needed, especially in Chorley. Policy HS8 should not preclude affordable housing exception sites from coming forward in Tier 3 settlements. The policy should be amended to include Tier 3 settlements.	Paragraph 82 of NPPF states that local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs. Policy HS8 has been prepared in accordance with this requirement. Tier 3 settlements are urban settlements (defined as urban local service centres in Policy SS2) and are therefore not included in the policy. An Affordable Housing Topic Paper has been prepared which sets out the Councils approach to affordable housing delivery.	No	Yes
A63.12	Rep'r PWA Planning Org. PWA Planning Agent Mr Paul Walton	Policy Policy HS8: Rural Exception Sites Site	The strict location criteria outlined in Policy HS8 to adjoin the settlement boundary is overly restrictive and could limit opportunities for sustainable development where well-related small rural sites exist just beyond the boundary but still offer good pedestrian links. NPPF 82 allows for a small proportion of market housing to be included in Rural Exception Sites where necessary to make schemes viable. Policy HS8 does not include any reference to this, which may make delivering affordable rural housing more challenging. Policy HS8 should include greater flexibility in site selection and a viability mechanism to ensure practical implementation.	Criterion d) of Policy HS8 allows rural exception sites that adjoin or are well related to the existing settlement. This is considered sufficient flexibility to allow sites to come forward that do not adjoin the settlement boundary provided, in accordance with criterion d), evidence is submitted demonstrating that it is the closest available site and good pedestrian links will be provided to the settlement. Rural exception sites need to be in sustainable locations so that residents can access services. Furthermore, Registered Providers will not acquire units that they deem are not in a sustainable location. It is not considered necessary to repeat the requirements of NPPF in relation to	No	Yes

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						allowing a small proportion of market housing to be included where necessary to make schemes viable.		
D02.20	Rep'r	Emily Hrycan	Policy	Policy HS8: Rural Exception Sites	Historic England 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. Amended wording proposed to criterion c) of the policy.	It is not considered necessary to add reference to the historic environment into the policy as Policy EN13 deals with the protection of the historic environment. The plan should be read as a whole.	No	No
	Org.	Historic England	Site					
	Agent							
D20.5	Rep'r	Mrs Julie Buttle	Policy	Policy HS8: Rural Exception Sites	Whittingham Parish Council notes the need to provide up to 9 affordable dwellings outside of the settlement boundary to meet an identifiable local need. Concerns are expressed that multiple applications could be submitted around the settlement boundary. It is noted that para 4.71 states that local need must be provided at settlement or parish level however, robust records must be kept to ensure this is enforced.	Concerns noted. Housing Need and Demand Studies form part of the evidence base for the Local Plan. They identify affordable housing needs across Central Lancashire. Planning applications for rural exception sites must be supported by evidence of local need at the settlement or parish level. Such evidence should have regard to the Housing Need and Demand Studies or any other surveys that the applicant has commissioned. Each planning application will be determined on its own merits.	No	Yes
	Org.	Whittingham Parish Council	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HS10: Houses In Multiple Occupation (HMOs)					Count of Representations against this policy/section:		1
D16.10	Rep'r	Mrs Lindsay Alder	Policy	Policy HS10: Houses In Multiple Occupation (HMOs)	National Highways may be able to provide comments if the HMO is in the area of SRN in respect to Criteria D.	Offer to provide comments against Criteria D is noted and welcomed.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HS11: Self-Build and Custom-Buld Housing						Count of Representations against this policy/section:		3
A59	Rep'r	Mr Alban Cassidy	Policy	Policy HS11: Self-Build and Custom-Buld Housing	The policy introduces a new definition of Self-Build and Custom-Build Housing inconsistent with legislation.	The statutory definition of Self-Build and Custom-Build Housing is set out within Housing and Planning Act (2016), Part 1, Chapter 2, Section 9. Para (1): [A1] "The building or completion by individuals, associations of individuals or persons working with or for individuals of houses to be occupied as homes by those individuals. [A2] But it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person" In summary, this is housing designed by its final occupants. The legislation however does not specify the extent of design choice which would achieve consistency with its definition. Criteria a) and para 4.89 therefore adds detail to ensure the policy is applied consistently.	No	Yes
	Org.	Cassidy = Ashton Group	Site					
	Agent							
A60.7	Rep'r	Ms Ashleigh Genco	Policy	Policy HS11: Self-Build and Custom-Buld Housing	The policy is supported.	The support is welcome.	No	Yes
	Org.	Story Homes	Site					
	Agent	Mr Dan Mitchell						

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D02.21	Rep'r	Emily Hrycan	Policy	Policy HS11: Self-Build and Custom-Buld Housing	The policy should include reference to the historic environment. The below modification is consequently proposed: b) SBCB plots proposed in areas with sensitive affect heritage and/or environmental constraints assets should include a Design Code, supplemented by individual 'Plot Passports', setting out detailed design limitations and a HIA. c) All other policies within the CLLP also apply.	Heritage is covered adequately within HS11 (and other policies) already. Note that Policy EN13 already triggers the requirement for a Heritage Statement where heritage assets may be impacted by development. It is unnecessary to state that applications will also be subject to other plan policies.	No	No
	Org.	Historic England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HS12: Specialist Housing				Count of Representations against this policy/section:	7			
A23.1	Rep'r	McCarthy Stone / Churchill	Policy	Policy HS12: Specialist Housing	A policy exclusively focusing upon encouraging older person's housing should be included.	Older person's housing (of the types listed within para 4.94 of supporting text) is included within the scope of 'specialist housing'. Criteria 1 consequently already sets out support for older person's housing, subject to sub-criteria a), b) and c). The representor's alternative wording/policy is noted; however, this does not appear to add value. As drafted, the policy is already clear and unambiguous pursuant to NPPF para 16 c).	No	Yes
	Org.	McCarthy Stone/Churchill	Site					
	Agent	Ms Jane Vlach						
A56.3	Rep'r	Reaper Limited and Hulton Land Ltd	Policy	Policy HS12: Specialist Housing	The Plan's evidence base finds a need for older person's housing, but this has not been planned for adequately. The Councils are reliant upon dwellings built to M4(2) and M4(3) standards, but there is no guarantee that these will be occupied by older people.	The representor notes that provision of older person's housing is proposed within allocations HS4.14: Gorlands and the West/NorthWest Preston Strategic Sites (SS3 + SS5). It should be noted that HS4.13: Heather Moor also proposes housing for older people. Dwellings built to M4(2) and M4(3) standards can be restricted to occupation by older people through S106 or planning condition where appropriate. Collectively, the proposed allocations, the broad support for older person's housing within HS12: Specialist Housing and the wheelchair accessible/adaptable standards required by HS6: Housing Mix and Density is a sound approach to meeting the needs of older people.	No	Yes
	Org.	Reaper Limited and Hulton Land Ltd	Site					
	Agent	Mr Matthew Symo						

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A57.2	Rep'r	GA Pet Food Partners Estates Ltd and Hulton Land Ltd	Policy	Policy HS12: Specialist Housing	The Plan's evidence base finds a need for older person's housing, but this has not been planned for adequately. The Councils are reliant upon dwellings built to M4(2) and M4(3) standards, but there is no guarantee that these will be occupied by older people.	Provision of older person's housing is proposed within allocations HS4.14: Gorlands and the West/NorthWest Preston Strategic Sites (SS3 + SS5). It should be noted that HS4.13: Heather Moor also proposes housing for older people. Dwellings built to M4(2) and M4(3) standards can be restricted to occupation by older people through S106 or planning condition where appropriate. Collectively, the proposed allocations, the broad support for older person's housing within Policy HS12: Specialist Housing and the wheelchair accessible/adaptable standards required by Policy HS6: Housing Mix and Density is a sound approach to meeting the needs of older people.	No	Yes
	Org.	GA Pet Food Partners	Site					
	Agent	Mr Matthew Symo						
A58.2	Rep'r	Reaper Limited and Hulton Land Ltd	Policy	Policy HS12: Specialist Housing	The Plan's evidence base finds a need for older person's housing, but this has not been planned for adequately. The Councils are reliant upon dwellings built to M4(2) and M4(3) standards, but there is no guarantee that these will be occupied by older people.	Provision of older person's housing is proposed within allocations HS4.14: Gorlands and the West/NorthWest Preston Strategic Sites (SS3 + SS5). It should be noted that HS4.13: Heather Moor also proposes housing for older people. Dwellings built to M4(2) and M4(3) standards can be restricted to occupation by older people through S106 or planning condition where appropriate. Collectively, the proposed allocations, the broad support for older person's housing within Policy HS12: Specialist Housing and the wheelchair accessible/adaptable standards required by Policy HS6: Housing Mix and Density	No	Yes
	Org.	Reaper Limited and Hulton Land Ltd	Site					
	Agent	Mr Matthew Symo						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						is a sound approach to meeting the needs of older people.		
A60.8	Rep'r	Ms Ashleigh Genco	Policy	Policy HS12: Specialist Housing	The Councils' evidence assessing the need for older person's housing is flawed. It simply 'bakes in' the current rate of provision per head and estimates the additional provision that would be required. The 'Housing in Later Life' toolkit should be used. It results in a requirement nearly four times higher than the Councils' evidence.	It is considered that the CLA's evidence is robust.	No	Yes
	Org.	Story Homes	Site					
	Agent	Mr Dan Mitchell						
B49.02	Rep'r	Ms Jane Vlach (McCarthy Stone & Churchill Living)	Policy	Policy HS12: Specialist Housing	The delivery of Older Persons' Housing is addressed in the draft Local Plan under 'specialist housing' in Policy HS12. Whilst we do not disagree with the sentiment of the policy, we suggest that the scale and importance of the national and local need for older persons' housing requires a specific policy dedicated to promoting older persons' housing.	The Council considers that a specific policy in relation to older people's housing is not required. Collectively, the proposed allocations, the broad support for older person's housing within HS12: Specialist Housing and the wheelchair accessible/adaptable standards required by Policy HS6: Housing Mix and Density is a sound approach to meeting the needs of older people.	No	Yes
	Org.	McCarthy Stone and Churchill Living	Site					
	Agent							
B59.1	Rep'r	Fairhaven Housing Association	Policy	Policy HS12: Specialist Housing	Support principle of the policy, however the Plan is over reliant upon windfall development to meet the housing needs of older people.	Support for the policy is welcomed. Provision of older person's housing is not entirely dependent upon windfall. Older person's housing is proposed at allocations HS4.14: Gorlands, the West/NorthWest Preston Strategic Sites (SS3 + SS5) and HS4.13: Heather Moor.	No	Yes
	Org.	Fairhaven Housing Association	Site					
	Agent	Mrs Deborah Smith						

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Policy HS13 (Strategic Policy): Gypsy, Traveller and Travelling Showperson Needs					Count of Representations against this policy/section:		5
A01.01	Rep'r	Mr. Michael Linfoot	Policy	Policy HS13 (Strategic Policy): Gypsy, Traveller and Travelling Showperson Needs	The Local Plan allocates two sites for permanent gypsy and traveller pitches. These two sites are current authorised sites. Paragraph 4.100 identifies the number of pitches currently on these sites and the table following paragraph 4.101 identifies the additional permanent pitch need over the plan period. The proposed allocations will address some of the identified additional need through intensification but will not meet the additional need in full. Paragraphs 4.102 to 4.105 identify how the additional need over the plan period will be met. A Gypsy and Traveller and Travelling Showpeople Topic Paper has also been prepared which sets out the approach to addressing the unmet need in more detail. Disagree with the proposed modifications to criterion 1 of Policy HS13. The allocations do not all relate to the additional need identified in the GTAA, they also include existing authorised pitches which are to be protected. The additional need in the GTAA relates to pitches required in addition to the existing authorised pitches. It is not considered necessary to identify the existing number of pitches and proposed additional pitches on each site in the policy. The GTAA identifies the permanent pitch need and Policy HS13, the supporting text to Policy HS13 and the Gypsy and Traveller	No	Yes
	Org.	Private Individual	Site	Policy HS13 is inadequate and unsound as it does not set pitch targets to address permanent and transit needs in accordance with paragraph 9 of PPTS. The Councils have failed to make use of the process to alter Green Belt boundaries to meet needs as set out in paragraph 17 of PPTS. The plan fails to make any allocations for Gypsies and Travellers. The Local Plan therefore indirectly discriminates against Gypsies and Travellers and is contrary to the Public Sector Equality Duty. Modifications are necessary to make Policy HS13 sound. Criterion 1 should be amended to identify that at least 49 permanent pitches will be provided for by the allocations, and further allocations need to be identified and appraised through major modifications to the plan to meet the identified need. The number of pitches should be identified for each allocation. Criteria 1 should also be amended to state that where the allocations are in the Green Belt, the land should be removed from the Green Belt and allocated as a residential gypsy and traveller site only. There is a compelling case for removing the allocation at Hut Lane from the Green Belt along with further land adjacent to the allocation (1 Heath Paddock). Criteria 2 should be amended to include reference to resist the loss of authorised sites as well as the proposed allocations.			
	Agent	Mr. Michael Hargre					

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				and Travelling Showpeople Topic Paper identify how this need is being addressed. Disagree that the Hut Lane site and any further sites authorised for gypsy and traveller pitches in the Green Belt should be removed from the Green Belt. In order to amend Green Belt boundaries, exceptional circumstances must be demonstrated in accordance with the NPPF. Before demonstrating that exceptional circumstances exist, the Council must demonstrate that it has examined all other reasonable options to meet the identified need. This site was allocated as it already has planning permission. It is therefore not necessary to remove it from the Green Belt. Disagree that the additional land adjacent to the Hut Lane site, which is owned by Chorley Council, should also be allocated for permanent pitches. In November 2023, 300 mixed native trees and hedgerow whips were planted on the site as part of Chorley Councils Emergency Tree Plan 2020-2030 (published in September 2020) which includes a pledge to plant 116,000 trees in the borough by 2025 in response to the climate and nature crisis. The site is therefore not suitable or available for development. It is considered that the 6 additional pitch need on the authorised site at Hut Lane over the plan period can be accommodated on the site. There are currently 3 households living on the site		

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				but the planning permission is for up to 7 caravans of which no more than 3 can be mobile homes, therefore more households can be accommodated on the site. The site is not laid out in formal pitches as it is owned and occupied by an extended family. As stated in the Planning Statement submitted as part of the planning application, the site is used flexibly and the planning permission does not restrict the number of people/households living on the site therefore some of the additional 6 pitch need can be addressed through the existing planning permission. The GTAA states that discussions with the site owner indicate that there is potential to further intensify the site with the addition of statics/caravans to help meet future needs arising from the formation of new households on the site. If it is agreed that the existing allocation cannot meet the additional need identified in the GTAA for the households currently living on the site, an alternative site would need to be found. Even if the adjacent land were available, the Council could not just automatically allocate that site. In accordance with the NPPF, exceptional circumstances must be demonstrated to justify release of land from the Green Belt. The Council must demonstrate that it has examined all other reasonable options to meet the identified need before Green Belt land can be released. This would involve examining land available outside of the Green Belt first.		

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						It is not considered necessary to amend criterion 2. As stated above, a Gypsy and Traveller and Travelling Showpeople Topic Paper has been prepared which sets out the approach to addressing the unmet need.		
A01.02	Rep'r	Mr. Michael Linfoot	Policy	Policy HS13 (Strategic Policy): Gypsy, Traveller and Travelling Showperson Needs	Criterion 5 is supported apart from the reference to public transport in 5 a). Gypsies and travellers tend to be strongly dependent on private cars and commercial vehicles and are very limited users of public transport. Requiring accessibility to public transport is of little relevance and may make it more difficult to meet the needs for pitches. The policy should be modified to remove reference to public transport.	Disagree that Policy HS13 should not require future proposals for gypsy and traveller pitches to be accessible by public transport. As set out in NPPF, the purpose of the planning system is to contribute to the achievement of sustainable development and at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 13 of PPTS also states that local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally.	No	Yes
	Org.	Private Individual	Site					
	Agent	Mr. Michael Hargre						
A01.04	Rep'r	Mr. Michael Linfoot	Policy	Policy HS13 (Strategic Policy): Gypsy, Traveller and Travelling Showperson Needs	Paragraph 4.103 is incorrect and misleading. The family have needs that exceed the capacity of the existing site. The family needs accommodation equating to 5-6 additional pitches. If the family are able to acquire and develop the adjacent land in Council ownership (1 Heath Paddock) they will develop the land so it provides all or most of the accommodation they need. Suggest a modification to paragraph 4.103 to also include reference to the allocation and development of 1 Heath Paddock.	Disagree that the additional land adjacent to the Hut Lane site, which is owned by Chorley Council, should also be allocated for permanent pitches. In November 2023, 300 mixed native trees and hedgerow whips were planted on the site as part of Chorley Councils Emergency Tree Plan 2020-2030 (published in September 2020) which includes a pledge to plant 116,000 trees in the borough by 2025 in response to the climate and nature crisis. The site is therefore not suitable or available for development.	No	Yes
	Org.	Private Individual	Site					
	Agent	Mr. Michael Hargre						

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				It is considered that the 6 additional pitch need on the authorised site at Hut Lane can be accommodated on the site. There are currently 3 households living on the site but the planning permission is for up to 7 caravans of which no more than 3 can be mobile homes, therefore more households can be accommodated on the site. The site is not laid out in formal pitches as it is owned and occupied by an extended family. As stated in the Planning Statement submitted as part of the planning application, the site is used flexibly and the planning permission does not restrict the number of people/households living on the site therefore some of the additional 6 pitch need can be addressed through the existing planning permission. The GTAA states that discussions with the site owner indicate that there is potential to further intensify the site with the addition of statics/caravans to help meet future needs arising from the formation of new households on the site. If it is agreed that the existing allocation cannot meet the additional need identified in the GTAA for the households currently living on the site, an alternative site would need to be found. Even if the adjacent land were available, the Council could not just automatically allocate that site. In accordance with the NPPF, exceptional circumstances must be demonstrated to justify release of land from the Green		

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						Belt. The Council must demonstrate that it has examined all other reasonable options to meet the identified need before Green Belt land can be released. This would involve examining land available outside of the Green Belt first.		
B22	Rep'r	Mr Presley Cook (Travelling Showperson Lancastrian Amusements)	Policy	Policy HS13 (Strategic Policy): Gypsy, Traveller and Travelling Showperson Needs	The GTAA has not identified any specific need for travelling showpeople plots. Have been in contact with Chorley Council over the last couple of years regarding relocating to the borough as their business operates in the area. Currently have a plot in Bolton but it is next to a dangerous building. The GTAA focuses on the needs of gypsies and travellers and the needs of travelling showpeople are overlooked. The Local Plan needs changing to say there is a need for travelling showpeople and state plots are to be found and safeguarded.	The GTAA does not identify the need for travelling showpeople plots in Chorley. The Council have therefore not allocated any sites for travelling showpeople in the Local Plan. Paragraph 13 of PPTS states that criteria-based policies should be included in Local Plans where there is no identified need to provide a basis for decisions in case applications nevertheless come forward. In accordance with this requirement, Policy HS13 includes criteria for gypsy and traveller and travelling showpeople site applications.	No	Yes
	Org.	Private Individual	Site					
	Agent							
D02.22	Rep'r	Emily Hrycan	Policy	Policy HS13 (Strategic Policy): Gypsy, Traveller and Travelling Showperson Needs	The policy is unsound, it should include reference to the historic environment. The text should be amended to include reference to other policies of the Plan or “avoiding harm to the historic environment”.	It is not considered necessary to add reference to the historic environment into the policy as Policy EN13 deals with the protection of the historic environment. The plan should be read as a whole.	No	No
	Org.	Historic England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC1 (Strategic Policy): Scale of Economic Growth				Count of Representations against this policy/section:	10			
A02.01	Rep'r	Mr. Roger Bracewell	Policy	Policy EC1 (Strategic Policy): Scale of Economic Growth	-Employment OAN reduced significantly, particularly in Chorley, between the 2022 and the 2024 Employment Land Studies (ELS). Acknowledged that a different methodology was used for the 2024 ELS but the reasons for the scale of the reduction is not adequately described in the ELS. - Considers the SHELAA site assessments to be flawed, which has limited employment land supply sites in Chorley. The reduction in the assessed site area of SHELAA Ref: 19C050 (Euxton Park Golf Centre), promoted by the representation, to 0.69ha, compared to the larger site area submitted, was undertaken for unclear, unrealistic and unjustified reasons. - The Local Plan would allocate more employment land than identified need where sites in policies SS3, EC2-4, EC5 and EC6 are all taken into account, which total 218.14ha across Central Lancashire compared to a total OAN of 172.87ha. - The distribution of the employment land allocations does not correspond with the OAN because in Preston and to a lesser extent in South Ribble it allocates excessive employment land whilst allocating insufficient employment land in Chorley. Proposes the following modifications: - Allocate more employment land in Chorley (Chorley total supply is 20.34ha across Policies SS3, EC2-4, EC5 and EC6 compared to Chorley OAN of 41.45ha).	The 2024 ELS is clear that the OAN figures in the 2024 ELS are not directly comparable with those in the ELS Studies of 2017, 2019 and 2022. The councils maintain the evidence base is robust and no changes to the supply of employment land are required.	No	Yes
	Org.	GA Pet Food Partners	Site					
	Agent	Mr. Matthew Good						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					- Reassess the Chorley SHELAA sites for employment use using the full submitted site area without reduction of the site area submitted via the SHELAA methodology. -Provide additional evidence to justify the reduction in the employment land OAN between the 2022 and the 2024 Employment Land Studies by the BE Group. Further clarify the amount, sources and distribution of employment land supply proposed in the Local Plan.			
A06.05	Rep'r Org. Agent	Maple Grove Developments Maple Grove Developments Mr Paul Newton	Policy Site	Policy EC1 (Strategic Policy): Scale of Economic Growth	The extant planning permission (App Ref: LCC/2022/0044) at the Cuerden site (Policy EC6) does not include a large amount of office use and so mention of the Cuerden site in paragraph 5.8 of the explanation to policy EC1 should be removed. The Local Plan is over-reliant on the Cuerden site for the delivery of office space.	Para 5.8 refers to locations such as Cuerden providing office space, it also notes the City and Town centre ahead of this for providing offices space and is not reliant on mixed use allocations such as Cuerden alone to meet this need. Thus, it is considered that no modification is required to the mention of the Cuerden site in paragraph 5.8 of Policy EC1.	No	Yes
A31.09	Rep'r Org. Agent	Mrs Emily Armstrong F1 Real Estate Management Mr John Francis	Policy Site	Policy EC1 (Strategic Policy): Scale of Economic Growth	Comments on Chapter 05: Prosperous Economy of the Local Plan. Proposed modification to paragraph 5.1 of Policy EC1 to better reflect the key purpose and deliverables of the CLLP as follows: 5.1 The CLLP is seeks to provide a positive and deliverable policy framework, which supports jobs, businesses and investment, to support and build a strong and competitive economy. It sets a framework to reflect the different drivers	The Councils consider the modifications proposed in the representation are unnecessary. No change required.	No	Yes

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					and needs within Central Lancashire's economy with the aim to build and sustain a vibrant, diverse and resilient local economy, that encourages both large, medium and small scale economic development opportunities, and meets the need for specific forms of economic development throughout the area in appropriate and sustainable locations to meet and respond to market needs.			
A31.10	Rep'r	Mrs Emily Armstrong	Policy	Policy EC1 (Strategic Policy): Scale of Economic Growth	Concerned about the deliverability of a number of sites including Preston West (Policy SS5, Site Ref: SS5) and Cuerden (Policy EC6, Site Ref: EC6.1). Types of employment development that have locational demands, such as a major logistics site to serve Chorley on the M65 corridor, are not met by the employment land allocations. The employment land allocations will not meet the full need and not in the locations where it is needed or where need is greatest. Representation appends an independent report by Iceni on the ELS Update 2025 by the BE Group. The reduction in industrial land OAN for Chorley between the ELS Update 2025 and the previous update is inappropriate in light of market demand and market signals, indicating suppressed demand resulting from a lack of employment land supply. Unmet need from Core Strategy employment land	The councils consider that the evidence as presented is robust and no changes to the employment supply are required. Information currently available provides no certainty that a hospital will be provided within Site Ref: EC6.1 at Cuerden and the site has planning history involving the provision of employment use. The site area of EC6.1 for employment use therefore does not require amendment. Regarding the c.63.3ha site area for employment use of the Preston West site (Policy SS5, Site Ref: SS5), the Council is currently exploring with the landowners the correct mix of employment and housing for this allocation. The 50% split was indicative whilst agreements to bring the site forward were put in place, the council is working in more detail with the site promoters as part of wider master planning to agree the final split on this site. No change is required to this policy.	No	Yes
	Org.	F1 Real Estate Management	Site					
	Agent	Mr John Francis						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			take-up targets not being met should be reflected in the CLLP Plan Period. Strategic sub-regional employment land needs are not considered in the ELS Update 2025, which focuses on local need. There are few strategic sites in Chorley that can meet this need. Employment land should be provided to meet the needs of the UK's defence sector. Chorley, Central Lancashire and the Property Market Area defined in the Iceni report, which comprises Central Lancashire combined with Blackburn with Darwen, Hyndburn and Burnley, have historically low vacancy and availability rates, where net absorption has been supressed since 2018, exacerbated by a lack of deliverable employment floorspace. Using a net absorption and completion model, the residual need for employment land is increased from the ELS update 2025 to: Chorley: 28-55ha Central Lancashire: 57-74ha Property Market Area (Central Lancashire Combined with Blackburn with Darwen,			

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					Hyndburn and Burnley): 202-233ha Iceni recommends that the need for strategic units should be considered at the Property Market Area level. The representation considers that the ELS Update 2025 should be revised, that the employment land requirement should be substantially increased and a revised spatial vision, employment strategy and employment policies should be provided, which fundamental issues cannot be addressed by modifications.			
A36.3	Rep'r	Mr Neil Lucas	Policy	Policy EC1 (Strategic Policy): Scale of Economic Growth	ELS Land Supply and OAN Update 2024 is deeply flawed – see Section 5 of the report by AshtonHale attached to the representation. Logik appointed Wisher Consulting to review the BE Group ELS (report at Appendix 3 of the AshtonHale report), which considers the evidence to be flawed, as detailed in the report by AshtonHale. 24ha should be used for Cuerden not the 50ha in the Local Plan because: • 16 ha has been sold to the NHS for a new hospital; • 4ha is required for strategic landscaping and access arrangements as part of the planning permission; • Of the remaining 30ha, some 20% (6ha) is approved for non-employment land uses, such as leisure and retail. The 9ha of land north of Lancashire Business Park (allocation EC4.1) is	Information currently available provides no certainty that a hospital will be provided within Site Ref: EC6.1 at Cuerden and the site has planning history involving the provision of employment use. The Plan identifies more than sufficient land to meet expected needs over the plan period, as such no changes to the policy and allocation are considered necessary.	No	Yes
	Org.	Logik Strategic Land	Site					
	Agent	Mr Neil Lucas						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					unavailable for other occupiers except Leyland Trucks, which is holding the land for their expansion, as mentioned in the Council's assessment, and there are bridge infrastructure requirements to open up the site. Increase the employment land requirement in EC1, particularly in South Ribble, to support both local and wider strategic employment needs, to provide adequate employment land supply and to meet economic growth. Consider now the implications of the National Cyber Force, acknowledging the need for a Strategic Site Allocation at Cuerdale. The Cuerdale and Salmesbury areas have potential for strategic development. Proposed modifications to Policy EC1 are to update the employment land figures of 173ha and in the table of paragraph 1 of Policy EC1 with the findings of a revised ELS Update and to insert 'and the Cuerdale Strategic Site Allocation' into paragraph 5 of Policy EC1 to include it alongside the Samlesbury Advanced Engineering and Manufacturing Enterprise Zone as a regionally significant site for employment.			
A37.2	Rep'r	Mr Andrew Dewhurst	Policy	Policy EC1 (Strategic Policy): Scale of Economic Growth	The comment is made against the Employment Land Study (ELS) and SHELAA site profiles. The Local Plan lacks economic growth	The councils consider that the evidence as presented is robust and no changes to the employment supply are required.	No	Yes
	Org.	Maple Grove Developments Ltd	Site					

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	Agent Mr Justin Cove		ambition, contrary to Lancashire-wide aspirations, Local Industrial Strategies and other strategies such as within the devolution deal for Lancashire Combined County Authority and the Lancashire Growth Plan (2025-2035, February 2025 consultation by the Combined County Authority). This is contrary to NPPF (2023) paragraphs 85-86. Policy EC1 does not provide a further breakdown by employment land type within the use classes and employment land allocations identified within Policy EC1. Consequently, unclear whether all types of identified employment needs would be met in full. The total site area for employment across mixed use allocations in Chorley is incorrect and should state 12.66ha in Policy EC5. The 173ha of combined OAN for employment land across Central Lancashire, identified in the table within Policy EC1 would not be met by the 154.84ha of total employment land allocations and mixed-use allocations in Policies EC2 to 6, creating an employment land supply shortfall that should be met by additional employment land allocations. This is further exacerbated in South Ribble in respect of realistically available and deliverable land, including viability issues. Proposed modification: The 50ha of employment land at Cuerden (Policy EC6.1) should be reduced to reflect that Table 44 of the ELS (2024) found only			

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			31.93ha of the site is realistically available employment land supply and to reflect the mix of uses in extant consent at the site (App Ref: LCC/07/2022/00044) that would reduce land at the site available for Class E(g), B2 and B8 use. Part of the Cuerden allocation EC6.1 which is outside planning application site LCC/07/2022/00044 is controlled by a third party with no certainty that this land parcel will be delivered. Proposed modification: The ELS (2024) findings indicate that the realistically available and deliverable land at employment land allocation EC4.1 (Land north of Lancashire Business Park) is less than the 9.2ha identified in Policy EC4 at allocation EC4.1. The 9.2ha site area at allocation EC4.1 should therefore be reduced to take account of land remaining if the watercourse bisecting the site is bridged and to reflect Flood Risk, which issues may affect viability and thus whether the site or its identified extent is realistically available and deliverable. Proposed modification: Allocate further employment land allocations across Central Lancashire. The ELS – Land Supply and OAN Update 2024 by the BE Group is flawed – the reduction in OAN between the 2022 and 2024 studies is substantial, particularly in South Ribble and is partly the result of a Policy Off methodology compared to the Policy On methodology of the 2017 and 2019 ELS studies. Policy Off makes no			

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					allowance for any major public sector programmes, such as the Samlesbury Enterprise Zone and City Deal Programme, which might generate jobs above the baseline and does not reflect the drive for economic growth across Lancashire.			
A70.3	Rep'r	Mr Farrington	Policy	Policy EC1 (Strategic Policy): Scale of Economic Growth	The representor puts forward a case in favour of allocating omission sites for mixed use development in South Ribble. The employment sites show a lack of growth and ambition. The majority of the SR employment land is to be provided on a single site at Cuerden. No retail or leisure allocations are proposed within the Plan. The representor promotes provision of employment land allocations at strategic road corridors in South Ribble. The agent considers locational operator demand exists for the provision of additional employment land allocations that the agent considers would also align with BE Group Local Plan evidence regarding types of employment sites desirable to the market for ease of vehicle access. Agent considers more employment land required to provide for higher employment growth ambitions than provided in Local Plan and to meet need by allowing for a buffer in the event Cuerden mixed use allocation not delivered. Retail quantitative need evidence out of	The Councils consider that the evidence base is robust. The Plan allocates sufficient land for employment growth. The omission sites lie in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. As the Authorities can meet their need for employment land within existing settlements and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.	No	Yes
	Org.	Trustees of the Worden Estate	Site					
	Agent	Mr Andy McMullan						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					date. Lack of retail land allocations outside centres, particularly in south Leyland, to accommodate identified quantitative retail need and retail need of housing growth.			
D03.6	Rep'r	Helen Holland	Policy	Policy EC1 (Strategic Policy): Scale of Economic Growth	Policy EC1 is not ambitious enough to sufficiently stimulate and enable sustainable economic and housing growth. Its evidence base underestimates jobs growth compared to the Oxford Economics data source and the jobs growth figures in the Employment Land Study do not take into consideration the 3,120 direct and indirect jobs creation identified on page 19 of The Lancashire Growth Plan in respect of the National Cyber Force HQ within Samlesbury Enterprise Zone. Policy EC1 will result in a shortfall of meeting employment needs, therefore Green Belt land should be released, prioritising grey belt sites which conform with sustainable patterns of development, to help to meet this shortfall. Emphasis should be given to cyber corridor growth potential and its economic benefits, located between Lancaster and Manchester (including the M6-A59 corridor and the Growth Axis linking Samlesbury, Blackburn town centre and the M65). The Samlesbury Enterprise Zone and Innovation Hub and the adjoining BAE Systems site comprises an important economic cluster within the above cyber corridor, which should be consolidated and expanded by complementary	The councils consider that the evidence as presented is robust and no changes to the employment supply are required. The Local Plan presents an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The provision of a phasing mechanism within Part 5 of Policy EC1 is unnecessary.	No	Yes
	Org.	Blackburn with Darwen Borough Council	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					employment and residential growth. Proposed modification: consider adding in a phasing or other similar policy mechanism to Part 5 of Policy EC1 so that the development of the site promoted at land at Mellor Brook would not be developed for employment purposes until such time as the comprehensive delivery of development at the Enterprise Zone has been confirmed or committed.			
D16.11	Rep'r	Mrs Lindsay Alder	Policy	Policy EC1 (Strategic Policy): Scale of Economic Growth	There are employment land allocations / strategic site allocations involving employment use, which are located near the Strategic Road Network. Cumulative transport and highway impacts of these allocations should be considered together with those in neighbouring Authorities to identify where these may place undue impact on the Strategic Road Network. Consideration should be given to coordinating these strategic sites, with National Highways consulted on strategies to mitigate any potential impacts.	Noted.	No	Yes
	Org.	National Highways	Site					
	Agent							
D26.03	Rep'r	Ms Rachel Whitaker	Policy	Policy EC1 (Strategic Policy): Scale of Economic Growth	The Local Plan should address how nature recovery can support a strong economy both directly and indirectly. Example provided of directly through capital generated by BNG delivery and indirectly via the provision of greenspaces, thus improving air quality and reducing stress on health services.	No modification required, suggested change is unnecessary. There are separate policies in the Local plan relating to BNG and the provision of greenspace.	No	No
	Org.	Natural England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC2: Employment Allocations Chorley				Count of Representations against this policy/section: 4		
A02.05	Rep'r: Mr. Roger Bracewell Org.: GA Pet Food Partners Agent: Mr. Matthew Good	Policy: Policy EC2: Employment Allocations Chorley Site:	Policy EC2 identifies just 7.68ha of employment allocations in Chorley. When mixed use sites are added the employment land supply raises to just 20.34ha which is less than 50% of the identified need (41.45ha). The reasons for this is not justified.	As identified in paragraph 5.10 of the SHELAA, supply is also made up of extant planning permissions not allocated in the Local Plan. Completions since the start of the plan period also count towards supply. In Chorley, the supply exceeds the need identified in Policy EC1. In addition to the 20.34ha allocated for employment in Policies EC2 and EC5, at 1st April 2024 (the base date of the supply calculations) there were extant planning permissions for employment of 17.95ha. Also in 2023/24 3.82ha of employment land was developed. This takes the total supply to 42.11ha.	No	Yes
D02.23	Rep'r: Emily Hrycan Org.: Historic England Agent:	Policy: Policy EC2: Employment Allocations Chorley Site:	Welcome production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. As drafted, the CLLP does not ensure this evidence is included within the individual site policies contained in Appendix 5 (where relevant). Proposed modification: Insert reference to the Council's HIA [in the KDCs for each site listed within Appendix 5), that says: Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.	Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance. It is therefore not necessary to include this requirement within the KDCs of each allocation site.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D15.11	Rep'r	Andrew Leyssens	Policy	Policy EC2: Employment Allocations Chorley	With regards to the draft allocations, we have undertaken an initial assessment of potential issues. The assessments relate to: 1. Sites with pressurised water main within the boundary; 2. Sites with a water network structure within the boundary; 3. Sites within 500m of a wastewater treatment works; 4. Sites with a pressurised sewer within the boundary; 5. Sites with a gravity sewer in the boundary; 6. Site within an easement within the boundary; 7. Sites with land owned by United Utilities within the boundary; 8. Sites in proximity to a sewer flooding incident; 9. Site on water catchment land; 10. Sites in groundwater source protection zone 1 or 2; and 11. Sites within an on-site modelled sewer flood risk. We wish to specifically note that a number of your site allocations do not include key development considerations. We object to this approach as we feel all sites should be guided by key development considerations to ensure that the constraints which we have identified are reflected by any application for planning permission at the site.	The Councils liaised with United Utilities as part of the SHELAA site assessment work. The above constraints were provided and have therefore already been taken into consideration in the selection of the allocations. No specific concerns raised in the representation in relation to sites allocated under Policy EC2. Key development considerations are included in Appendix 5 of the plan for both of the sites allocated in Policy EC2.	No	Yes
	Org.	United Utilties	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D26.04	Rep'r	Ms Rachel Whitaker	Policy	Policy EC2: Employment Allocations Chorley	Natural England identifies that the proposed allocation is situated on deep peat. Natural England do not support the principle of developing on restorable peat. Consequently, we advise that further information is required to determine if restorable peat is present. We advise policy wording reflects the safeguard of deep restorable peat and provides tailored habitat opportunities.	The representation does not identify which allocation these comments relate to. Contact has been made with Natural England and they have clarified the comments relate to site EC2.1. It is not considered necessary to amend policy EC2 to identify that there is deep peat situated on the site. Policy EN14: Environmental Quality seeks to prevent development that will result in significant harm to soil quality. A Construction Environmental Management Plan will be required alongside any planning application to identify how soils will be managed during construction.	No	No
	Org.	Natural England	Site	EC2.1				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC3: Employment Allocations Preston				Count of Representations against this policy/section:	7			
A31.12	Rep'r	Mrs Emily Armstrong	Policy	Policy EC3: Employment Allocations Preston	Uncertainty of deliverability of site EC3.2 (Preston East Junction 31A) for large scale logistics unit given highway constraint identified by National Highways in EIA Scoping request 06/2025/0208. Cumulative highways impact on Junction 31A unclear of delivery of both EC3.2 and EC3.3 (11 Roman Road Farm; outline App Ref: 06/2022/0745). Plot sizes and site characteristics at EC3.3 unsuitable for sub-regional logistics units of 9,300sq.m. and above. Additional employment land allocations required to meet sub-regional large-scale logistics needs, as identified in the Iceni report appended to the representation. Refers to separate representation to site promotion at Land adjacent to M65 J3, Stanworth, Chorley, to help to address the need to provide more employment land allocations to provide for large scale units in the sub-regional logistics sector.	Additional employment land allocations are not required to meet sub-regional large-scale logistics needs. The councils have identified more than sufficient supply to meet the areas needs. The councils consider that the evidence as presented is robust and no changes to the employment supply are required.	No	Yes
	Org.	F1 Real Estate Management	Site	EC3.2, EC3.3				
	Agent	Mr John Francis						
D02.24	Rep'r	Emily Hrycan	Policy	Policy EC3: Employment Allocations Preston	Welcome production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. As drafted, the CLLP does not ensure this evidence is included within the individual site policies contained in Appendix 5 (where relevant). Proposed modification: Insert reference to the Council's HIA [in the KDCs for each site listed within Appendix 5), that says:	Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance. It is therefore not necessary to include this requirement within the KDCs of each allocation site.	No	No
	Org.	Historic England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.			
D05.6	Rep'r	Angela Brookes	Policy	Policy EC3: Employment Allocations Preston	One or more of the proposed development sites are crossed or in proximity to National Grid Electricity Transmission (NGET) assets. This includes EC3.4: Riversway, Maritime Way, Preston. Plans are provided as supporting documents. Without acknowledgment of NGET assets present within the site, policies should not be considered effective as they cannot be delivered unencumbered by the constraints of NGET infrastructure. There are no known new infrastructure interactions with the area but demand for electricity is expected to rise. Councils should be cognisant of changes supporting the transition to low carbon electricity. Proposed modification to wording of EC3.4 to include reference to NGET infrastructure. Infrastructure: The development will include a strategy for responding to the National Grid Overhead Cable Route present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.	It is expected that the National Grid will be consulted regarding applications at the site during the usual Development Management process. Consequently, it is unnecessary to reference this specific requirement within the policy.	No	No
	Org.	National Grid Electricity Transmission	Site	EC3.4				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D15.12	Rep'r	Andrew Leyssens	Policy	Policy EC3: Employment Allocations Preston	With regards to the draft allocations, we have undertaken an initial assessment of potential issues. The assessments relate to: 1. Sites with pressurised water main within the boundary; 2. Sites with a water network structure within the boundary; 3. Sites within 500m of a wastewater treatment works; 4. Sites with a pressurised sewer within the boundary; 5. Sites with a gravity sewer in the boundary; 6. Site within an easement within the boundary; 7. Sites with land owned by United Utilities within the boundary; 8. Sites in proximity to a sewer flooding incident; 9. Site on water catchment land; 10. Sites in groundwater source protection zone 1 or 2; and 11. Sites within an on-site modelled sewer flood risk. We wish to specifically note that a number of your site allocations do not include key development considerations. We object to this approach as we feel all sites should be guided by key development considerations to ensure that the constraints which we have identified are reflected by any application for planning permission at the site.	The Councils liaised with United Utilities as part of the SHELAA site assessment work. The above constraints were provided and have therefore already been taken into consideration in the selection of the allocations. Specific concerns raised in the representation in relation to sites allocated under Policy EC3 are set out in the Utilities section of Appendix 6: Preston Site Profiles, including Site Profile 5 for allocation EC3.1. It is not considered necessary to include key development considerations for all allocations. They have only been prepared for sites where there are known constraints and/or where there are other issues such as the site being in multiple ownership. Also a number of the allocations already have planning permission therefore it is not necessary to include key development considerations. Constraints will be addressed at the planning application stage.	No	Yes
	Org.	United Utilties	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D16.13	Rep'r	Mrs Lindsay Alder	Policy	Policy EC3: Employment Allocations Preston	The response identifies locations of the Strategic Road Network where potential impacts may occur of employment land allocations due to their size or proximity to the SRN. These are: EC2.1; SRN Impact: M61 J8 EC2.2; SRN Impact: unlikely EC3.1; SRN Impact: M6 J31; M55 J2 EC3.2; SRN Impact: M6 J31a EC3.4; SRN Impact: M55 J2 EC4.1; SRN Impact: M6 J29; M65 J1 EC4.2; SRN Impact: M6 J29; M65 J1	Noted. The council will continue to liaise with National Highways as a statutory consultee.	No	Yes
	Org.	National Highways	Site					
	Agent							
D16.32	Rep'r	Mrs Lindsay Alder	Policy	Policy EC3: Employment Allocations Preston	The response identifies locations of the Strategic Road Network where potential impacts may occur of employment land allocations due to their size or proximity to the SRN. These are: EC3.1; SRN Impact: M6 J31; M55 J2 EC3.2; SRN Impact: M6 J31a EC3.4; SRN Impact: M55 J2	Noted. The council will continue to liaise with National Highways as a statutory consultee.	No	Yes
	Org.	National Highways	Site					
	Agent							
D26.05	Rep'r	Ms Rachel Whitaker	Policy	Policy EC3: Employment Allocations Preston	EC3.3 must also consider impacts to Red Scar and Tun Brook Woods SSSI. This designated site contains the largest areas of deciduous woodland in the country with a rich ground flora and other notable flora.	The Plan must be read as a whole. Policy EC7 seeks to avoid impacts on designated sites, including Sites of Special Scientific Interest. Paragraph 3 within Policy EC3 requires the provision of a wintering bird survey alongside any planning application for site EC3.3 in accordance with Policy EN7. This issue was addressed at the outline planning application stage of App Ref: 06/2022/0745.	No	No
	Org.	Natural England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC4: Employment Allocations South RIbble						Count of Representations against this policy/section:		8
A06.06	Rep'r	Maple Grove Developments	Policy	Policy EC4: Employment Allocations South RIbble	The employment provision detailed within the mixed-use allocation at Cuerden (EC6), should be included within Policy EC4.	NPPF para 16 d) states that policies should be clearly written and unambiguous. The plan is structured so that mixed use allocations (EC6) are presented separately from exclusive housing and employment allocations to avoid duplicating their inclusion.	No	Yes
	Org.	Maple Grove Developments	Site					
	Agent	Mr Paul Newton						
A31.13	Rep'r	Mrs Emily Armstrong	Policy	Policy EC4: Employment Allocations in South Ribble	The representor has no specific comment on the two allocations in South Ribble, sites EC4.1 and EC4.2, other than in connection with its wider representations on the lack of strategic employment land as neither site is capable or suitable in size, location and access to provide for a sub-regional logistics operation to meet need in the market, as evidence in the appended Iceni Report. It is the representors view that insufficient employment land is proposed to meet identified needs for large-scale, sub-regional logistics opportunities, as identified in the appended Iceni Report, and the Local Plan would be improved in its soundness, effectiveness and justification through allocation of such land at the representors' site at Stanworth.	The Councils consider the Plan allocates sufficient land for employment growth including land that is suitable in size, location and access to provide for sub regional logistics operations.	No	Yes
	Org.	F1 Real Estate Management	Site					
	Agent	Mr John Francis						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A70.8	Rep'r	Mr Farrington	Policy	Policy EC4: Employment Allocations South RIbble	The allocation of housing, leisure and employment sites need to be reconsidered, as it is insufficient to meet needs. Land at Dawson Lane is promoted, and illustrative site designs are submitted, for a mixed-use development – including 64 residential units (parcel A), commercial and retail (B), commercial (C) and landscape and BNG enhancement (D).	The Council's evidence base explains how housing and employment requirements have been calculated and apportioned, and how proposed development sites have been identified, assessed and allocated. The Plan allocates sufficient land for housing and employment growth. The proposed 'alternative' site is split into 4 parcels, all of which are in Green Belt. As the Authorities can meet their need for homes and commercial development within existing settlements there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.	No	Yes
	Org.	Trustees of the Worden Estate	Site					
	Agent	Mr Andy McMullan						
B53	Rep'r	Mr Phil Jones (Managing Director Leyland Trucks)	Policy	Policy EC4: Employment Allocations South RIbble	Proposed allocation EC4.1 is supported. Land is under control of Leyland Trucks and forms part of their long-term expansion and improvement strategy. Allocation is essential to future success of Leyland Trucks.	Support for allocation noted.	No	No
	Org.	Private Individual	Site					
	Agent							
D02.25	Rep'r	Emily Hrycan	Policy	Policy EC4: Employment Allocations South RIbble	Welcome production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. As drafted, the CLLP does not ensure this evidence is included within the individual site policies contained in Appendix 5 (where relevant). Proposed modification: Insert reference to the Council's HIA [in the KDCs for each	Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance. It is therefore not necessary to include this requirement within the KDCs of each	No	No
	Org.	Historic England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					site listed within Appendix 5), that says: Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.	allocation site.		
D15.13	Rep'r	Andrew Leyssens	Policy	Policy EC4: Employment Allocations South RIbble	The accompanying appendix details some site-specific issues and constraints identified by United Utilities (UU) within South Ribble, including EC4.2 (Leyland Business Park) and EC4.1 (Land north of Lancashire Business Park). UU propose that these are addressed within the Key Development Considerations (KDCs) for each site, and request that all site allocations are served by accompanying KDCs.	The Council's expect that developers liaise with United Utilities (and other infrastructure and utility providers) in the early stages of the design process to ensure that issues and constraints are identified. The accompanying KDCs to EC4.1 and EC4.2 sites (within Appendix 5) state that "Early dialogue with UU is recommended prior to the submission of a planning application" and that "attention will be required to drainage…". It is not considered necessary for the specific details of UU infrastructure to be included in the KDCs for each site allocation with the plan.	No	Yes
	Org.	United Utilties	Site					
	Agent							
D16.33	Rep'r	Mrs Lindsay Alder	Policy	Policy EC4: Employment Allocations South RIbble	The response identifies locations of the Strategic Road Network where potential impacts may occur of employment land allocations due to their size or proximity to the SRN. These are: EC4.1; SRN Impact: M6 J29; M65 J1 EC4.2; SRN Impact: M6 J29; M65 J1	Noted. The council will continue to liaise with National Highways as a statutory consultee.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D19.7	Rep'r	Mr Philip Carter	Policy	Policy EC4: Employment Allocations South RIbble	For clarity, the following text should be added to the Key Development Considerations (KDC). "Proposals for any future scheme shall be accompanied by a Flood Risk Assessment that demonstrates the development would be safe without increasing flood risk elsewhere and that no inappropriate development will be in areas at a high risk of flooding or in the functional floodplain."	The necessity for a Flood Risk Assessment is covered adequately through other policies, including EN10, and EN11.	No	No
	Org.	Environment Agency	Site	EC4.1				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC5: Mixed Use Allocations Chorley				Count of Representations against this policy/section:		10
A21.2	Rep'r Mr Nick Scott Org. Ther Emerson Group Agent	Policy Policy EC5: Mixed Use Allocations Chorley Site EC5.1	The policy as drafted does not evidence how the split of 'residential' and 'employment' areas for each of the mixed-use allocations has been calculated. It is important that further justification is provided. Clarification on the forms of development that would be considered acceptable within an allocated mixed-use area should be provided. Further clarification should also be provided as to what forms of residential development would be considered acceptable within an allocated mixed-use area. Given the site's sustainability credentials and proximity to public transport, combined with the Borough's aging population, there is a strong case to be made for alternative forms of residential accommodation being considered appropriate in such locations, in particular those falling within Use Classes C1 and C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended), including care and nursing homes, assisted living accommodation and other forms of specialist accommodation. The Emerson Group very much welcome the principle of a mixed-use allocation at Buckshaw Village, and the additional opportunities afforded by this to broaden its market appeal. However, given this sites prominent location, we respectfully request that there must be	The site is allocated for employment in the current adopted Chorley Local Plan. At Regulation 18 it was proposed that the employment allocation would be rolled forward given the whole site has planning permission for office units and development had commenced with one office unit being constructed. Prior to Regulation 19, a site promoter survey was undertaken to gather further information on the sites being considered for allocation. The site promoter for this site responded and requested that the site be changed to housing or mixed use due to the lack of market interest in the remaining office units permitted that had not yet been constructed. A road (Station Approach) runs through the site therefore the site is effectively split into two parcels. The parcel to the east of Station Approach contains the newly built office unit which covers approximately 50% of that parcel. Further employment units are located to the east of this parcel. It was therefore considered that employment uses were most appropriate on this part of the site. The remaining land within this parcel measures 0.54ha therefore this is the amount of land allocated in Policy EC5 for employment. The parcel to the west of Station Approach is located adjacent to existing	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			some additional flexibility to enable variance from the amounts of residential and commercial development prescribed in the policy. Policy EC5 must enable proposals for the whole site to be considered positively. For example, a proposal comprising a B8 'employment' use for the whole site should be considered on its merits as an employment generating use and should not necessarily be prejudiced or penalised by the need to deliver a prescribed level of housing. Similarly, the reverse should be applicable. A site for 0.54 Ha of employment use may not be particularly appealing to the market given its modest size, and it should be noted that The Emerson Group already has extant permission to construct another large office building on the remaining land on the eastern side of Station Approach. Therefore, proposals that comprise a larger element of 'residential' use should also be considered on its merits	residential areas therefore this part of the site was considered more appropriate for housing. This parcel measures 1.5ha therefore this is the amount of land allocated for housing in Policy EC5. The proposed mix in Policy EC5 does not preclude a different mix coming forward provided any planning application for a different mix justifies that approach. The allocation also does not preclude proposals for developments falling into the C3 use class coming forward provided evidence for the need of this type of development is submitted alongside any planning application. The Council have changed the allocation from employment to mixed-use as requested by the site owner to allow some flexibility and have applied a split between housing and employment that it considers the most appropriate. The Councils are required to quantify the amount of housing and employment allocated in the Local Plan in order to be able to demonstrate how overall identified needs are being met. Policy EC5 identifies the type of employment uses that are considered appropriate on this site in the last column titled 'Employment Use Class'.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A24.7	Rep'r	Mrs Joanne Harding	Policy	Policy EC5: Mixed Use Allocations Chorley	The HBF considers that the Council will need to consider an appropriate balance of development, to ensure that all of their housing needs are met in terms of types and tenures; locations and markets, and to ensure that the Plan can deliver against its housing requirements. Although HBF does not comment on individual sites or allocations, we believe that the Plan should provide for a wide range of deliverable and developable sites across the Borough in order to provide competition and choice to ensure that housing needs are met in full. The Council may also want to consider if these mixed use sites are appropriate for a variety of housing and accommodation purposes including housing for older people and specialist housing.	There is a sufficient supply of housing and employment land to meet the housing and employment needs for Chorley identified in Policies HS1 and EC1. Supply is made up of the housing, employment and mixed use allocations as well as extant planning permissions. It is considered the supply provides for a wide range of deliverable and developable sites across the borough. Policy EC5 does not preclude proposals coming forward for older person and specialist housing on these sites.	No	Yes
	Org.	Home Builders Federation	Site	No specific site				
	Agent							
A31.14	Rep'r	Mrs Emily Armstrong	Policy	Policy EC5: Mixed Use Allocations Chorley	The representor generally supports the allocations. The representor asks for consideration to be given to increasing the extent of the allocation towards the south west, beyond the stream, so that an area of land also owned by the representor can be added to the allocation. This is to support use of the land for overspill parking to support the popular Bygone Times operation at the site.	Support noted. The additional land proposed is located in the Green Belt. The Central Lancashire authorities have been able to meet their housing and employment needs without the release of Green Belt land. Exceptional circumstances therefore can't be demonstrated to allocate this land.	No	Yes
	Org.	F1 Real Estate Management	Site	EC5.5				
	Agent	Mr John Francis						
C2	Rep'r	The Talbot Estate	Policy	Policy EC5: Mixed Use Allocations Chorley	In respect of allocation EC5.3, the plan is considered to be unsound because it is not consistent with national policy, in particular paragraph 124 of the NPPF. This requires planning policies to	This area of land has not been promoted to the Council previously. It was however still considered in the SHELAA process (site 19C171) as it is currently safeguarded land. The SHELAA identifies	No	Yes
	Org.	The Talbot Estate	Site	EC5.3				
	Agent	Mrs Claire Wilkinso						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. The southern boundary of proposed mixed-use allocation EC5.3 abuts our clients land which extends to approximately 1.5ha and is currently allocated as 'Safeguarded Land' (BNE3.1) in the Local Plan for future development needs beyond 2026. It is our view that this area of land ought to be included within proposed allocation EC5.3 to enable the maximum deliverability of the housing and employment requirements on this site whilst achieving a development which enhances the environment and provides healthy living conditions. The inclusion of this land in the allocation will promote the effective use of land, within the proposed settlement boundary, that would otherwise be redundant. The land is available now and is suitable to include as part of this allocation.	that this site was discounted as there is no suitable access to the site. The only access would be through an area identified as being at high risk of flooding. Part of the wider safeguarded land allocation is included in site EC3.5 as it was promoted alongside additional land to the north. Access to the site would be from the north of the site where there is no flood risk. It is proposed that the part of site EC3.5 that falls within the current safeguarded land allocation where there is high flood risk, will contain the employment element of the mixed use allocation with the housing being located on the northern part of the site. If this site were to be added to the allocation, access would need to be from the EC3.5 allocation. No evidence has been submitted to demonstrate that discussions have taken place with the adjacent landowner regarding obtaining access through their site. Furthermore, given the high flood risk of this land, housing development would not be suitable but employment development may be. In the new Local Plan, the site is no longer allocated as safeguarded land. It has been included within the Chorley settlement boundary which is in Tier 2 of the settlement hierarchy of Policy SS2 which is the secondary focus for growth in Central Lancashire. The site could be developed in the future without the need to allocate it provided any		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						proposal meets the relevant policy requirements and can demonstrate that any constraints can be mitigated.		
D02.26	Rep'r	Emily Hrycan	Policy	Policy EC5: Mixed Use Allocations Chorley	Welcome production of heritage impact assessments for the sites, that have been undertaken by the relevant authority. As drafted, the CLLP does not ensure this evidence is included within the individual site policies contained in Appendix 5 (where relevant). Proposed modification: Insert reference to the Council's HIA [in the KDCs for each site listed within Appendix 5), that says: Development should be in accordance with the HIA that has been completed by the Council to support the allocation of the site.	Policy EN13 (1(b)) already requires proposals affecting a designated heritage asset and/or its setting to be accompanied by a suitably detailed Heritage Statement, providing an understanding of the asset's significance and explaining the impact of the proposals on the asset's significance. It is therefore not necessary to include this requirement within the KDCs of each allocation site.	No	No
	Org.	Historic England	Site					
	Agent							
D04.02	Rep'r	Laura Marchant	Policy	Policy EC5: Mixed Use Allocations Chorley	Homes England are supportive of this allocation. The site is suitable available and achievable. It should be noted that Homes England do not own the full extent of the allocation, the remainder is owned by Chorley Council. Homes England has regular conversations with Chorley Council and both parties are committed to the delivery of this allocation. To support delivery of the site a Development Statement was provided at the two Reg 18 consultations.	Support noted.	No	Yes
	Org.	Homes England	Site	EC5.2				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D15.14	Rep'r	Andrew Leyssens	Policy	Policy EC5: Mixed Use Allocations Chorley	With regards to the draft allocations, we have undertaken an initial assessment of potential issues. The assessments relate to: 1. Sites with pressurised water main within the boundary; 2. Sites with a water network structure within the boundary; 3. Sites within 500m of a wastewater treatment works; 4. Sites with a pressurised sewer within the boundary; 5. Sites with a gravity sewer in the boundary; 6. Site within an easement within the boundary; 7. Sites with land owned by United Utilities within the boundary; 8. Sites in proximity to a sewer flooding incident; 9. Site on water catchment land; 10. Sites in groundwater source protection zone 1 or 2; and 11. Sites within an on-site modelled sewer flood risk. We wish to specifically note that a number of your site allocations do not include key development considerations. We object to this approach as we feel all sites should be guided by key development considerations to ensure that the constraints which we have identified are reflected by any application for planning permission at the site. The following constraints / concerns are identified at site EC5.6: 1) Significant wastewater infrastructure	The Councils liaised with United Utilities as part of the SHELAA site assessment work. The above constraints were provided and have therefore already been taken into consideration in the selection of the allocations. It is not considered necessary to include key development considerations for all allocations. They have only been prepared for sites where there are known constraints and/or where there are other issues such as the site being in multiple ownership. Also a number of the allocations already have planning permission therefore it is not necessary to include key development considerations. Constraints will be addressed at the planning application stage. The SHELAA includes the assessment of site EC5.6. The site is considered deliverable. It is owned by Chorley Council who are liaising with United Utilities regarding the development of the site.	No	Yes
	Org.	United Utilties	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					passes through the site; 2) There is a modelled risk of sewer flooding on site; 3) There is a record of sewer flooding having occurred on the site; and 4) The site is in proximity to Chorley Wastewater Treatment Works. Relevant impact assessments must be undertaken to establish if the site is developable. Each of these constraints could affect the deliverability of this site and therefore it is critical that the site is covered by a series of key development considerations. We request that these constraints are reflected in the key development considerations for the site.			
D16.12	Rep'r Org. Agent	Mrs Lindsay Alder National Highways	Policy Site	Policy EC5: Mixed Use Allocations Chorley EC5.3	Noted that a number of allocations (including mixed use, housing and employment sites) are located within reasonable proximity to each other. National Highways expect Central Lancashire authorities to drive a co-ordinated approach to understanding cumulative impacts and identifying appropriate mitigation, whilst avoiding a detrimental impact to the strategic road network (SRN).	Comments noted. The CLLP will be supported by the Transport Study (Jacobs/LCC) which will consider cumulative impacts of new development and appropriate mitigation.	No	Yes
D16.15	Rep'r Org. Agent	Mrs Lindsay Alder National Highways	Policy Site	Policy EC5: Mixed Use Allocations Chorley EC5.2	Noted that a number of allocations (including mixed use, housing and employment sites) are located within reasonable proximity to each other. National Highways expect Central Lancashire authorities to drive a co-ordinated approach to understanding cumulative impacts and identifying	Comments noted. The CLLP will be supported by the Transport Study (Jacobs/LCC) which will consider cumulative impacts of new development and appropriate mitigation.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					appropriate mitigation, whilst avoiding a detrimental impact to the strategic road network (SRN).			
D19.5	Rep'r	Mr Philip Carter	Policy	Policy EC5: Mixed Use Allocations Chorley	Allocation EC5.7 has areas of medium and high flood risk within the site boundary. A Level 2 SFRA has been completed to support the allocation and Policy EC5 states that 1.19ha of the site is available for housing (32 units) which avoids the areas of risk identified in the Level 2 SFRA. However, in March 2025 the Environment Agency updated the Flood Map for Planning and this has resulted in more of the site being classified as having a high risk of flooding. As such, the developable area of 1.19ha for housing will have reduced and based on the current policy, would allocates at least some land for residential development in what is now a high flood risk area, which would be contrary to national policy. To ensure that any future residential development is not allocated in a high flood risk area, the Level 2 SFRA should be updated to account for the increase in risk and the total area of 1.19ha that allocated for residential use in Policy EC5 should be reduced to ensure all new housing within the mixed use allocation would not be located in areas of high flood risk. The developable area for housing and the expected residential yield in Policy EN5 can then be revised to take account of the new flood risk evidence.	The proposed allocation applies a 50/50 split between housing and employment. Since publication of the Regulation 19 Local Plan, the flood mapping has been updated. Previously approximately 50% of the site fell within Flood Zone 3, it was envisaged that the employment uses would be developed on this part of the site. On the new flood mapping approximately 75% of the site now falls within Flood Zone 3. Ongoing discussions are taking place with the Environment Agency to agree an appropriate mix on the site.	No	No
	Org.	Environment Agency	Site	EC5.7				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC6: Mixed Use Allocations South Ribble						Count of Representations against this policy/section:		8
A06.01	Rep'r	Maple Grove Developments	Policy	Policy EC6: Mixed Use Allocations South Ribble	The CLLP allocates 4 strategic sites. Cuerden should also be identified as a strategic (employment) site (as it is in the current adopted South Ribble Local Plan Policy C4).	The CLLP Glossary defines strategic sites as areas of land that have been identified in the Local Plan for housing and economic development. The emerging CLLP identifies 4 strategic sites which are all residential (NW Preston/Bartle, Pickerings Farm, Fulwood Barracks, Preston West). Introductory Paragraph 3.22 states that "strategic sites are central to the delivery of the spatial strategy, Policies SS1 and SS2, and achieving sustainable development." Paragraph 3.23 continues that the Central Lancashire Core Strategy (adopted 2012) identified strategic locations and strategic sites, with specific reference to Buckshaw Village and Cottam – both residential sites. The Cuerden site (EC6.1) was identified in the South Ribble Local Plan (2015), Policy C4, as a strategic employment site, "capable of stimulating economic growth in Central Lancashire and the wider Lancashire sub-region". Policy C4 stated that "Alternative uses, such as retail, leisure and housing, may be appropriate where it can be demonstrated that they help deliver employment use on the strategic site. The scale of any alterative enabling development will be limited to that…which will not prejudice the delivery and maintenance of the	No	Yes
	Org.	Maple Grove Developments	Site	EC6.1				
	Agent	Mr Paul Newton						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				primary employment function of the site". Therefore, whilst it was the original intent for the site to primarily focus on a strategic employment use, the policy made clear that alternative uses may be permitted. Since the adoption of Policy C4, outline planning permission has been granted for a mixed-use development including employment; retail; food, drink and drive-through restaurant use; hotel use; health, fitness and leisure; creche/nursery; car showrooms and residential (LCC/2022/0044). Reserved matters have also been submitted for the erection of 74 dwellings (LCC/2025/0007). On the basis that much of the site is now permissioned for a mix of uses, beyond just employment use, it is no longer appropriate to define the site as 'strategic employment' and it is therefore now included within the CLLP as a Mixed-Use allocation.		
A06.02	Rep'r Maple Grove Developments Org. Maple Grove Developments Agent Mr Paul Newton	Policy Policy EC6: Mixed Use Allocations South Ribble Site EC6.1	General allocation of the site is supported, but policy fails to include fundamental caveat that was included within the South Ribble Local Plan (2015) allocation under Policy C4 (Site J). This wording, along with adopted site wide Masterplan, acknowledged that alternative uses, other than employment, may be acceptable where they are clearly demonstrated to be necessary to fund essential infrastructure. The exclusion of	South Ribble Local Plan (2015) Policy C4 allocated land at Cuerden as a strategic employment site. The inclusion of the policy wording relating to acceptable alternative uses was relevant in order to ensure the delivery of the primary employment function of the site. Since the adoption of the plan, the site now benefits from outline planning permission (LCC/2022/0044) for a mixed-	Yes MA36	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			this wording from draft Policy EC6 is not justified and could undermine the future development of the site. Suggested amendment to Policy EC6: "3. Alternative uses may be acceptable where they are clearly demonstrated to be necessary to fund essential infrastructure. " The KDCs for the site (Appendix 6) also require refinement to optimise delivery of the site. Modifications proposed in supporting materials.	use development. Emerging CLLP Policy EC6 therefore now proposes the allocation of the land at Cuerden as a mixed-use site, which, by its definition, supports a mix of uses on the site. In Appendix 6, the associated KDC (EC6.1) specifies that "the scale of any non-employment development will be limited to that which is clearly demonstrated to be necessary to fund essential infrastructure and which will not prejudice the delivery and maintenance of the primary employment function of the site". Therefore, the KDC provides the necessary wording to ensure the delivery of the wider site for employment uses, and to ensure non-employment development is of a limited scale to fund essential infrastructure. The KDCs confirm that a phasing and infrastructure delivery schedule will be required for subsequent applications to identify how the site's essential infrastructure will be delivered in a comprehensive manner. Policy ID1 and ID2 guide how this shall be secured and funded/delivered. Therefore, it is not considered necessary to amend Policy EC6 as the appropriate guidance is afforded through the KDCs. Modification proposed by representor to provide consistency in wording of the KDCs for allocation sites. Currently, some say 'is likely to be required' whilst some say 'may be required'. - It is not		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				considered a change is required – 'is likely to' is used within other KDCs. The Representor has not included reasoning for why this modification is necessary. The purpose of this KDC is to note that flood risk has not been explored in detail on the residual parcels of the site without planning permission. No modification is considered necessary. In accordance with Policy EN13, harm to heritage assets should be considered and mitigated. The KDC is consistent with its parent policy and consequently modifications are unnecessary. The Representor has not included reasoning for why these modifications are necessary. They do not add value to the policy. No modification is considered necessary. In respect of the specific modifications proposed to the KDCs: - Remove repeated 'Masterplan' row from the KDCs on p262/p263		
A06.03	Rep'r: Maple Grove Developments Org.: Maple Grove Developments Agent: Mr Paul Newton	Policy: Policy EC6: Mixed Use Allocations South Ribble Site: EC6.1	Cuerden site erroneously referenced on the policies mapping as EC7.1 and should be corrected to EC6.1	Noted. Policies mapping for the Cuerden site should be corrected from reference EC7.1 to EC6.1.	Yes - Mapping PM05	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A24.18	Rep'r	Mrs Joanne Harding	Policy	Policy EC6: Mixed Use Allocations South Ribble	Object to EC6 on the grounds it is not justified, not effective and not consistent with national policy. The HBF consider the Council will need to consider an appropriate balance of development to ensure that all of their housing needs can be met and they plan can deliver its housing requirement. The HBF does not comment on individual sites / allocations. The Council may want to consider if these mixed-use sites are appropriate for a variety of housing types and accommodation purposes.	There is a sufficient supply of housing and employment land to meet the housing and employment needs for South Ribble. Supply is made up of the housing, employment and mixed-use allocations as well as extant planning permissions. It is considered the supply provides for a wide range of deliverable and developable sites across the borough. Policy EC6 does not preclude proposals coming forward for older person and specialist housing on these sites.	No	Yes
	Org.	Home Builders Federation	Site	EC6.1				
	Agent							
A31.15	Rep'r	Mrs Emily Armstrong	Policy	Policy EC6: Mixed Use Allocations South Ribble	Concerns raised that target of 50ha of employment use will not be achieved, on the basis that c.25 ha will now be used to support a new hospital. Despite this, the CLLP makes no attempt to adjust the total amount of employment land that will be delivered or allocated elsewhere. The policy should have the employment area reduced by c.25 ha and an additional column inserted reflecting the health care use. The representor puts forward their site at Stanworth for employment use to make up the subsequent shortfall in employment land.	In December 2024, the Government announced the potential for a brand-new hospital, replacing Royal Preston Hospital, to be replaced on land between Stanifield Lane and Wigan Road (Cuerden). NHS Lancashire announced a consultation was to be made available in the new year (2025). On the 24 January 2025, the Government announced that, following the outcome of their review of the national New Hospital Programme, the timescales for delivering the replacement hospital had been significantly impacted. As a result, the local NHS suspended public engagement on the proposed site and the planned programme of public events and independent market research was cancelled until further notice.	No	Yes
	Org.	F1 Real Estate Management	Site	EC6.1				
	Agent	Mr John Francis						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				At January 2025, the Government have indicated that Royal Preston Hospital is expected to be in Wave 3 of schemes (to start construction between 2035 and 2039). However, no details of the proposals are available, and no public consultation has been undertaken. At the time of finalising the CLLP, there had been no direct confirmation from LCC (as landowner / delivery body for the site), nor the NHS, that land had been sold or detailing the area of any respective land which may have been sold. As of May 2025, the CLAs are aware from https://newhospitals.info/information-hub/faqs that Lancashire Teaching Hospitals NHS Foundation Trust purchased 38.3 acres of land at a cost of £15m plus VAT (£18m) on 28 November 2024. [NB: This equates to c.15.5 ha, not 25ha referenced in the representation.] Land acquisition was supported through the national New Hospital Programme. However, https://newhospitals.info/ProposedSites states that "Whilst the NHS in Lancashire and South Cumbria has identified and secured proposed sites for new hospitals on new sites to replace both Royal Preston Hospital (Lancashire Teaching Hospitals NHS Foundation Trust) and Royal Lancaster Infirmary (University Hospitals of Morecambe Bay NHS Foundation Trust), it remains open to and welcoming of		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				suggestions of alternative sites, which will be subject to the same assessment criteria…" and "The local NHS will be proactively seeking feedback through a survey and programme of public engagement events, which will be launched early in 2025. This would be ahead of later formal public consultation." New Hospitals Programme :: Frequently asked questions also confirms that the Trusts are still to consider all options for the sites. Should a proposed site no longer be required for a new hospital build, then they have developed an exit strategy detailing the options for what they could do with the land / site. https://newhospitals.info/information-hub/faqs states no final decision has or can be taken on the site of the new hospital to replace RPH at this stage. Before the Trust can proceed to the consultation stage, a deliverable option is required to enable a full and transparent consultation process to commence. The NHS in Lancashire and South Cumbria is open to other sites being suggested, which would be subject to the same comprehensive review as the proposed site. Therefore, there remains a large degree of uncertainty about a new hospital on the Cuerden site. As Paragraph 6.25 of the CLLP notes, the Councils are continuing to work with the NHS to understand the detail and timescale of any forthcoming proposals. At this time,		

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						however, it not considered any changes to the policy are required.		
D05.7	Rep'r	Angela Brookes	Policy	Policy EC6: Mixed Use Allocations South Ribble	The proposed Key Development Considerations (KDCs) should respond to the existing overhead cable route running through the site. The below modification is proposed in the interests of making the policy more effective: The development will include a strategy for responding to the National Grid Overhead Cable Route present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.	It is expected that the National Grid will be consulted regarding applications at the site during the usual Development Management process. Consequently, it is unnecessary to reference this specific requirement within the policy.	No	No
	Org.	National Grid Electricity Transmission	Site	EC6.1				
	Agent							
D15.21	Rep'r	Andrew Leyssens	Policy	Policy EC6: Mixed Use Allocations South Ribble	United Utilities (UU) have submitted a series of site-specific issues and constraints relating to draft allocations, including that relating to EC6.1. With regards to the draft allocations, UU have undertaken an initial assessment of potential issues. UU wish to specifically note that a number of site allocations do not include key development considerations. UU object to this approach as we feel all sites should be guided by key development considerations to ensure that the constraints which we have identified are reflected by any application for planning	The Councils liaised with United Utilities as part of the SHELAA site assessment work. The constraints were provided and have therefore already been taken into consideration in the selection of the allocations. KDC's are provided for the Cuerden site which identify site constraints and indicate that early dialogue with UU is recommended prior to the submission of a planning application.	No	No
	Org.	United Utilties	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					permission at the site.			
D16.16	Rep'r	Mrs Lindsay Alder	Policy	Policy EC6: Mixed Use Allocations South Ribble	Noted that a number of allocations (including mixed use, housing and employment sites) are located within reasonable proximity to each other. National Highways expect Central Lancashire authorities to drive a co-ordinated approach to understanding cumulative impacts and identifying appropriate mitigation, whilst avoiding a detrimental impact to the strategic road network (SRN).	Comments noted. The CLLP will be supported by the Transport Study (Jacobs/LCC) which will consider cumulative impacts of new development and appropriate mitigation.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC7: Protection of Existing Employment SItes				Count of Representations against this policy/section:	4			
A31.16	Rep'r	Mrs Emily Armstrong	Policy	Policy EC7: Protection of Existing Employment SItes	Comment: Many existing ageing employment premises and sites have viability issues, particularly at lower quality employment sites, which could be lost to non-employment use via the planning application process through compliance with Policy EC7 criteria. Proposed modification: Allowance, proposed as 15ha, should be made through additional employment land allocations to compensate for the likely loss of such sites and premises during the Plan Period, to be split between the Central Lancashire Authorities depending on the loss of existing employment sites. No objection to criteria a-c of Policy EC7.	The BE Group Employment Studies take into consideration vacancy rates and likely losses of existing employment land, as detailed in paragraph viii on page 7, Tables 7-9, Table 21 and the 5 year buffer mentioned in paragraph 3.41 and 3.51 of the ELS Land Supply and OAN Update 2024 (BE Group). These losses assumptions are set out in Table ES2 on page 8 of the ELS Land Supply and OAN Update 2024. The councils consider that the evidence as presented is robust and no changes to the employment supply are required. More than sufficient employment land has been allocated to meet employment land needs.	No	Yes
	Org.	F1 Real Estate Management	Site					
	Agent	Mr John Francis						
D10.2	Rep'r	Mrs Claire Lowe	Policy	Policy EC7: Protection of Existing Employment SItes	Ironworks site should be removed from EC7 and be allocated under EC10, as the site is under control of the university.	Noted, mapping error. EC7 mapping layer on the Policies Map to be amended accordingly.	Yes - Mapping	No
	Org.	University of Lancashire	Site	Ironworks Site			PM17	
	Agent							
D11.2	Rep'r	Rebecca Housam	Policy	Policy EC7: Protection of Existing Employment SItes	Proposed modification – remove the EC7 designation from Fulwood Barracks (Strategic Site Allocation SS4) on Policy Maps. Fulwood Barracks falls under Use Class C2A: Secure residential institutions, which is not an employment use as	Mapping Error noted and correction to the policies map proposed.	Yes - Mapping	Yes
	Org.	Defence Infrastructure Organisation	Site	SS4			PM16	
	Agent							

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					defined in paragraph 2.14 of the supporting text to Policy EC7. Given Policy EC7 concerns the protection of existing employment sites for employment use, the EC7 designation of Fulwood Barracks does not reflect the existing use of the site and the content of Policy EC7 is irrelevant to site ref: SS4.			
D16.34	Rep'r Org. Agent	Mrs Lindsay Alder National Highways	Policy Site	Policy EC7: Protection of Existing Employment SItes	If any sites amend their status away from employment sites towards residential led redevelopment, an assessment should be made if there is a cumulative impact on the SRN. For any larger redevelopment sites, National Highways should be consulted, particularly if the sites are near to large allocations or form a cluster of sites which may cause adverse impacts to the SRN.	Noted. The Councils will continue to work cooperatively with National Highways.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC9: SKills and Economic Inclusion				Count of Representations against this policy/section:	2			
A31.17	Rep'r	Mrs Emily Armstrong	Policy	Policy EC9: SKills and Economic Inclusion	Supports the policy and considers it to be Legally compliant and Sound.	Policy support noted.	No	Yes
	Org.	F1 Real Estate Management	Site					
	Agent	Mr John Francis						
D26.06	Rep'r	Ms Rachel Whitaker	Policy	Policy EC9: SKills and Economic Inclusion	Further consideration should be given to encouraging investment in green skills and green jobs as a means of reducing unemployment and encouraging economic growth and investment.	The Regulation 19 consultation Local Plan does not include the phrases 'green jobs' or 'green skills'. Paragraph 5.22 of the explanation to Policy EC9 refers to the National Skills Academy for Construction indicators and benchmarks. Green skills training hours comprise KPI 6 of the latest NSAfC indicators. The proposed modification is therefore unnecessary.	No	No
	Org.	Natural England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC10: University of Central Lancashire				Count of Representations against this policy/section:	2			
D10.3	Rep'r	Mrs Claire Lowe	Policy	Policy EC10: University of Central Lancashire	University has had ongoing dialogue with Central Lancashire Local Plan since 2023. It has requested flexibility in future planning policies to allow for adaptive reuse of university land and buildings and a clear approach to new purpose-built student accommodation. Of particular importance is emerging policy EC10. This policy aligns with university's aims and objectives and reflects collaborative approach with the Central Lancashire authorities. The University is supportive of the wording of emerging policy and remains committed to ongoing collaboration.	Support noted.	No	No
	Org.	University of Lancashire	Site					
	Agent							
D16.17	Rep'r	Mrs Lindsay Alder	Policy	Policy EC10: University of Central Lancashire	Development at the University Sports Arena is recommended to be in line with the policies of SS5 Preston West to allow for cohesive development without an adverse impact on the road network at A582 Edith Rigby Way and M55 Junction 2. Similarly, additional study accommodation developments are identified to require appropriate siting to be well served by public transport to reduce the impact on existing local residents. Therefore, if any large residential sites for student accommodation come forward, it is recommended that National Highways are consulted to reduce the impact on the local road network and therefore potential impact to the SRN.	Noted	No	Yes
	Org.	National Highways	Site					
	Agent							

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Rep ID	Representor Details; and Organisation; and Agent (if applicable)			Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC11 (Strategic Policy): Town Centre Hierarchy						Count of Representations against this policy/section:		4
A16	Rep'r	Cottam Hall Properties Ltd	Policy	Policy EC11 (Strategic Policy): Town Centre Hierarchy	Cottam Hall Properties Ltd own the former Cottam Brickworks site which is identified in the draft Local Plan and on the Policies Map as a District Centre. Although supportive of the site as a development opportunity, considers its allocation for a District Centre in Policy EC11 is not Sound for the following reasons: The extent of the Cottam District Centre allocation exceeds the scale of Class E uses that is viable to deliver in this location given market conditions and operator requirements. The Local Plan Retail evidence (February 2025) recommends allowing for flexibility of use at the site appropriate to market testing outcomes. Reference made to hybrid approval 06/2019/1451 and s73 approval 06/2022/1157. Although a discount food retailer is seeking to deliver the approved foodstore and there is strong market interest in the housing element, no substansive interest has been expressed in the outline element of the hybrid scheme for up to 11,425sq.m. of flexible A1, A2, A3, A4, B1, C3 and D1 use. Market appraisal report by Savills (February 2025) attached to the representation suggests the scale of commercial uses in the outline element of the hybrid approval will be very challenging to secure, lacks market interest and is likely unviable. Savills suggest the site may be able to	The Council have engaged in conversation with parties regarding the future use of the former Cottam Brickworks site and welcome continued dialogue on this site. The continued commitment to delivering the food store and complementary local uses at this site is noted and supported, however at this time no detailed information has been provided to support a change of designation at this site and no proposals to amend its existing designation have been submitted through the call for sites process to incorporate housing, as such no changes are proposed to this allocation. A planning application for any revised scheme with reduced Class E which addresses any viability issues in delivering a district centre can be considered through the planning application process.	No	Yes
	Org.	Cottam Hall Properties Ltd	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			alternatively accommodate a 'handful' of small retail units, potentially in a small retail terrace format, alongside the proposed foodstore. The Savills report anticipates little to no demand for new build offices at the site and found new build licenced leisure at the site, for example bar/restaurants/pubs serving food to be unviable. It found there could be a potential requirement for health and fitness use. Deliverable proposals involving the provision of flexible Class E uses and potentially residential use are yet to be prepared, which are likely to provided significantly less floorspace and less related car parking area than within the outline element of 06/2019/1451. As such, the use and scale of commercial uses at the Cottam Hall District Centre site needs to be flexible to allow for such a revised scheme to be incorporated within a residential led development at the site. Representation suggests proposed modification options: 1. Reduce the extent of the Cottam District Centre allocation to cover only the approved foodstore subject of the full planning permission element of 06/2019/1451 and an additional limited area, such as would accommodate a small retail terrace, to function as either a District Centre or Local Centre. The representation proposes the remainder of the site (approximately 4ha, 180 units) should be identified for residential use under Policy HS4, with scope for			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					specialist and later living accommodation and that the revised District Centre boundary should reflect the approved housing development. 2. Amend the Cottam District Centre allocation to a Mixed Use site for residential and Local / District Centre uses comprising approximately 180 dwellings, a foodstore (approximately 2,000sq.m.) and complementary small scale retail and commercial uses, subject to viability.			
A63.15	Rep'r	PWA Planning	Policy	Policy EC11 (Strategic Policy): Town Centre Hierarchy	Previous comments provided by PWA raised objections based upon the additional restrictions on Use Class E and the flexibility granted by the amended Use Classes Order, which allows changes within Class E without planning permission. The policy direction suggested refusal of developments based on a centre's poor health indicators was seen as an unjustified control over subcategories of Class E. There were concerns that if a centre is performing poorly, new development could be refused rather than encouraged. The policies proposed in the Draft Plan do not impose a direct restriction on Use Class E changes and support a mix of uses in the centres. Whilst they do not explicitly prohibit changes within Class E, retail function is prioritised which could indirectly limit flexibility for other Class E uses.	The comments are noted. The policy permits retail and other main town centre uses in a range of centres ensuring flexibility.	No	Yes
	Org.	PWA Planning	Site					
	Agent	Mr Paul Walton						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					While the Draft Plan maintains a focus on strengthening town centres, it still appears to limit the flexibility that was introduced by the Government's Use Class E reforms.			
A66.1	Rep'r	Mr Tom Whitehead	Policy	Policy EC11 (Strategic Policy): Town Centre Hierarchy	Replace the phrase 'must be refused' with 'should be refused' in paragraph 5.42.	The councils do not consider the proposed change is necessary and the supporting text is sufficient as drafted.	No	No
	Org.	Brookhouse Group	Site					
	Agent	Mr Alyn Nicholls						
D01.4	Rep'r	Eddie Graves	Policy	Policy EC11 (Strategic Policy): Town Centre Hierarchy	New District Centres at Preston West and Cottam and New Local Centres at North West Preston / Bartle and at Preston West, identified in Policy EC11 have scope to significantly adversely impact on the vitality and viability of existing town centres outside Central Lancashire e.g. at Kirkham, if the scale and mix of main town centre uses at these new centres exceeds their position in the retail hierarchy, for example through extensive comparison goods floorspace in Class E(a): Shops use. These District Centres and Local Centres should mainly meet local needs. The additional provision of community facilities within centres should not compromise those in Fylde, particularly in the adjoining rural area.	The Councils note the concerns expressed and have met and discussed these points with Fylde. A SoCG has been prepared which addresses the concerns raised. No policy changes are required.	No	Yes
	Org.	Fylde Council	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC12: Preston City Centre						Count of Representations against this policy/section:		5
A04.3	Rep'r	Cardinal Newman College	Policy	Policy EC12: Preston City Centre	The College falls within the Stoneygate Master Plan SPD. The proposals map shows the Stoneygate area has been substantially reduced and does not include the areas as defined by the Stoneygate Masterplan SPD. The College considers that this area should be defined to be consistent with the Stoneygate Regeneration Framework SPD.	The request for the Stoneygate Masterplan SPD boundary is noted and to be mapped on the Policies Map.	Yes - Mapping PM07	Yes
	Org.	Cardinal Newman College	Site					
	Agent	Mrs Helen Binns						
A66.2	Rep'r	Mr Tom Whitehead	Policy	Policy EC12: Preston City Centre	The policy is supported in principle, but detailed modifications are proposed to parts 5, 6, 7 and 9 to give greater clarify.	The policy is considered sound as drafted. The councils however accept that the Representor's suggestions regarding Part 5 have merit. Modification MA14 is consequently proposed. No other modifications accepted.	Yes MA14	No
	Org.	Brookhouse Group	Site					
	Agent	Mr Alyn Nicholls						
D02.27	Rep'r	Emily Hrycan	Policy	Policy EC12: Preston City Centre	The NPPF states that positively protecting and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. The role of the policy should be to protect and enhance heritage assets rather than protect and maintain them as heritage assets. Request policy wording amendments to bring policy in-line with national policy requirements.	Wording of Part 8 of Policy EC12 to be amended as to read "Preston Markets will be protected and enhanced…" to be consistent with national policy requirements.	Yes MA15	No
	Org.	Historic England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D13.1	Rep'r	Mr Geoff Lavery	Policy	Policy EC12: Preston City Centre	The ICB has identified NHS health infrastructure requirements in order to support the projected population increase over the plan period to 2041. The requirements are supported by EC12.	Support noted and welcomed.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site					
	Agent							
D16.18	Rep'r	Mrs Lindsay Alder	Policy	Policy EC12: Preston City Centre	Supports improvements to public transport, sustainable, and active travel as part of new and redevelopment sites within the City Centre, adheres to the principles of sustainable development.	Support is noted and welcomed.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC13: Development in Leyland and Chorley Town Centres					Count of Representations against this policy/section:		1
D16.19	Rep'r	Mrs Lindsay Alder	Policy	Policy EC13: Development in Leyland and Chorley Town Centres	Supports improvements to public transport, sustainable, and active travel as part of new and redevelopment sites within the identified local centres of Leyland and Chorley, as this adheres to the principles of sustainable development	Support is noted and welcomed.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EC14: Priorities for Tourism and the Visitor Economy				Count of Representations against this policy/section:	3			
D02.28	Rep'r	Emily Hrycan	Policy	Policy EC14: Priorities for Tourism and the Visitor Economy	The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Any new development for tourism should enhance a heritage asset rather than improve it. This change will reflect the requirements of national policy on this matter. Bullet 4b amended to say: "development will reuse existing buildings/brownfield land and/or will improve enhance a heritage asset;"	The councils recognise that wording changes proposed may help improve the clarity of the policy and supporting text. The councils will continue to work with Historic England through the examination process and through any SoCG prepared.	No	No
	Org.	Historic England	Site					
	Agent							
D16.20	Rep'r	Mrs Lindsay Alder	Policy	Policy EC14: Priorities for Tourism and the Visitor Economy	For any larger new visitor sites, or expansions of existing sites where there is the potential for high volumes of visitors to arrive using private vehicles, National Highways should be consulted on appropriate mitigation measures which should be in place prior to the new / expanded site opening to the public.	Noted.	No	Yes
	Org.	National Highways	Site					
	Agent							
D26.07	Rep'r	Ms Rachel Whitaker	Policy	Policy EC14: Priorities for Tourism and the Visitor Economy	Natural England advise this section interlinks with Policy EN7 Designated Sites for Nature Conservation due to potential recreational disturbance at pertinent designated sites.	The Plan should be read as a whole. This is covered by EN7.	No	No
	Org.	Natural England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HC1 (Strategic Policy): Health & Wellbeing				Count of Representations against this policy/section: 5		
A23.3	Rep'r: McCarthy Stone / Churchill Org.: McCarthy Stone/Churchill Agent: Ms Jane Vlach	Policy: Policy HC1 (Strategic Policy): Health & Wellbeing Site:	Specialist housing for older people has numerous health benefits. Proposals for such schemes should therefore not be required to submit a Health Impact Assessment (HIA).	Whilst the health benefits of specialist housing for older people are noted, it is presumptuous to assume in every instance, these would be so great to justify an immunity from preparing a HIA. HIAs are flexible tools, where requirements can be made proportionate to the type and scale of a proposed scheme. As per para 6.12 of supporting text, further details will be published within the Councils' validation requirements, informed by Public Health England guidance, following adoption of the Plan.	No	Yes
B49.03	Rep'r: Ms Jane Vlach (McCarthy Stone & Churchill Living) Org.: McCarthy Stone and Churchill Living Agent:	Policy: Policy HC1 (Strategic Policy): Health & Wellbeing Site:	Policy HC1 requires the submission of a Health Impact Assessment for 'some major developments not otherwise subject to Environmental Impact Assessment'. The Council should note that there is a common misconception that older person's housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person's schemes to show that there is capacity in healthcare systems and to show that the scheme will not have a health impact, the policy should instead recognise the health benefits that delivering older people's housing can bring to individuals. Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care	The comments are noted but the Council considers the policy as written to be sound.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources. For the plan to be in line with national policy and effective the following wording should be added to para 2 of the policy to recognise the health benefits of older persons housing. Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment			
D12.6	Rep'r Org. Agent	Richard Sharples Lancashire County Council	Policy Site	Policy HC1 (Strategic Policy): Health & Wellbeing	Support the policy. Reference should be made to Sport England's Active Design guidance.	Support for the policy is welcome. Para 6.10 already requires major development to be informed by Sport England's Active Design guidance.	No	No
D13.10	Rep'r Org.	Mr Geoff Lavery Lancashire & South Cumbria Integrated Care Board	Policy Site	Policy HC1 (Strategic Policy): Health & Wellbeing	An announcement made in December 2024 identified the proposed site for the replacement of Royal Preston Hospital as land between Stanifield Lane and Wigan Road, south of Stoney Lane in Farington, near to the end of the M65 West [AKA Cuerden], subject to a future public	The Councils recognise the need for and support the NHS Hospital Trust to deliver a new hospital in Central Lancashire, either through redevelopment of existing sites or on a new site.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent				consultation. Construction has been delayed to between 2036 and 2039. The inclusion of a replacement for Royal Preston Hospital should be referenced in future iterations of the Local Plan, with Councils working with the NHS / ICB to understand the detail and timescale of any forthcoming proposals.			
D26.08	Rep'r	Ms Rachel Whitaker	Policy	Policy HC1 (Strategic Policy): Health & Wellbeing	Access to the natural environment is linked to Health and Wellbeing and should be referred to in the policy.	Criterion c) already refers to Open Spaces. Also referring to the natural environment is therefore unnecessary.	No	No
	Org.	Natural England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HC2: Hot Food Takeaways						Count of Representations against this policy/section:		2
A13	Rep'r	McDonald's Restaurants Limited	Policy	Policy HC2: Hot Food Takeaways	The policy could require applicants to demonstrate the wider economic, social and environmental contribution they would make. The Councils' evidence relies on a disproportionate link between a single land use classification and the incidence of obesity in children. Criterion b) iii should be deleted as this effectively imposes a blanket ban on new hot food takeaways in most wards. Criterion b) iv should be modified to "Within 400m walking distance of a secondary school entrance, unless opening hours are restricted at school opening times, lunchtimes and school closing times."	Applicants are encouraged to demonstrate the social, economic and environmental benefits for any development typology. The policy should not require this for Hot Food Takeaways specifically, however, note that NPPF para 9 advises that its sustainability objectives should not be regarded as criteria. The Councils' evidence informing the preparation of the policy, presented in LCC's Hot Food Takeaway Topic Paper, is robust. Policy HC2 criterion b) iii is drafted to balance the competing priorities of business and public health. If reductions in child obesity are achieved using the metrics specified within the policy, then HFTs in those wards are likely to be more acceptable. The insertion of the term 'walking distance' to qualify 400m proposed by the Representor is not helpful. The 400m distance cited within the policy is a local interpretation of the 'walking distance' test set out within NPPF para 97. Justification for this distance can be found within the council's evidence. Duplicating terms cited in national policy risk making the policy unclear.	No	No
	Org.	McDonald's Restaurants Limited	Site					
	Agent	Mr Steve Rowe						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D12.5	Rep'r	Richard Sharples	Policy	Policy HC2: Hot Food Takeaways	LCC support the policy and have prepared a Hot Food Takeaway Topic Paper to provide evidence to underpin the policy.	Support welcomed.	No	No
	Org.	Lancashire County Council	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HC3: Community, Health and Education Facilities				Count of Representations against this policy/section:	6			
A04.1	Rep'r	Cardinal Newman College	Policy	Policy HC3: Community, Health and Education Facilities	On the emerging Proposals Map, the College (similar to other colleges) receives no specific designation, protection or explicit policy support. This is considered not only a missed opportunity, but also an objectionable omission, particularly given Strategic Objective 10 of the Plan and that the fact that some community, health and education facilities receive a designation on the Proposals Map under Policy HC3. Furthermore, there appears to be no rhyme or reason or logic to who receives a designation and even more perversely, those who need the policy support provided by such a designation most, appear to have been omitted i.e. education facilities and not designated. In the case of the College, it is considered that the education designation should include the full extent of the College's landholding, including the main Lark Hill Road site. St Augustines site, St Francis site, St John Henry site and the Maths Schools site.	The only existing education facility which has an allocation on the Policies Map is the University of Central Lancashire. The policies mapping identifies a series of sites under HC3 for the expansion or provision of new education / community / health facilities which are required to support new development and these sites are safeguarded to ensure the land remains available for this purpose. Existing education facilities are all within settlement boundaries, where there is a presumption in favour of sustainable development in national planning policy. The playing fields associated with educational buildings are protected open space. These designations allow for development such as new buildings or facilities on the site whilst protecting the playing areas for this use. It is not considered necessary to allocate each educational facility across the 3 council areas. The proposed policies allow for development for educational purposes at these sites.	No	Yes
	Org.	Cardinal Newman College	Site					
	Agent	Mrs Helen Binns						
A04.2	Rep'r	Cardinal Newman College	Policy	Policy HC3: Community, Health and Education Facilities	The current Core Strategy has a specific section and education policy, Policy 14 'Education'. The proposed Policy HC3 is not an education specific policy, but rather a more general community infrastructure policy. It is considered a	Existing education facilities are all within settlement boundaries, where there is a presumption in favour of sustainable development in national planning policy. The playing fields associated with educational buildings are protected	No	Yes
	Org.	Cardinal Newman College	Site					

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent	Mrs Helen Binns			wholly unsuitable and unhelpful replacement for Policy 14. Indeed, the effect of Policy HC3 would be to substantially and demonstrably weaken local planning policy for education development generally and thus the level of policy support afforded to further education providers seeking planning permission for improvements to and the expansion of their facilities. It is suggested that the emerging Plan is amended to differentiate between community facilities, health care facilities and education facilities, all of which are entirely different uses with different impacts and requirements and that an education specific policy is reintroduced. This policy should be positively worded and set out a strong and clear presumption in favour of supporting all education related development, including but not limited to new buildings, extensions, and improvements to existing facilities and supporting infrastructure.	open space. Policy HC3 is supportive of educational development providing certain criteria are satisfied. Paragraph 6.27 confirms "the council will also support improvement to existing... post 16 facilities not currently listed above" [in the policy], including that to cater for increased education provision. The Plan is therefore supportive of education related development, including new buildings, extensions, and improvements to existing facilities and supporting infrastructure, and does not weaken the level of policy support afforded to education providers seeking planning permission for improvements or expansion. The Council do not consider separate policies are required.		
A40.2	Rep'r	Miss Claire Parker	Policy	Policy HC3: Community, Health and Education Facilities	It is considered that Policy HC3 is unsound as it does not consider all opportunities for the allocation of community facilities within the borough of Preston (including community halls). The following sites should be given due consideration and allocated for the associated community uses. 1. Land to west of A6 Garstang Road 2. Land at D'Urton Lane	The Councils consider that Policy HC3 is sound and will help ensure provision of community facilities through the development management process.	No	Yes
	Org.	Cassidy and Ashton	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					3. Land at D'Urton Lane / east of James Towers Way with site of approved place of worship directly to the south 4. Land by Ambulance Station, Broughton			
D13.3	Rep'r	Mr Geoff Lavery	Policy	Policy HC3: Community, Health and Education Facilities	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. It is imperative that in addition to working with the hospital Trusts that the Council recognise ICB as statutory commissioner of health and care services as a key consultee regarding the new hospital development. The inclusion of a replacement for Royal Preston Hospital should also be referenced in future iterations of the Local Plan with Councils working with the NHS / ICB to understand the detail and timescale of any forthcoming proposals. Please embed health and care accessibility into planning policy, ensuring the provision of infrastructure to support integrated community-based health delivery, with input from both ICS and NHS during the planning of developments.	Noted. The Councils recognise the need for and support the NHS Hospital Trust in the development of a new hospital in Central Lancashire, either through redevelopment of the existing sites or on a new site. An announcement was made in December 2024 on the proposed site for the new Royal Preston Hospital being in South Ribble and the Councils are working with the NHS to understand the detail and timescale of any forthcoming proposal. The Councils recognise the importance of ensuring accessibility to health and care facilities through the planning process. We will continue to work with all relevant stakeholders at the appropriate stages of the planning process.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D14.1	Rep'r	Mr Daniel Fleet	Policy	Policy HC3: Community, Health and Education Facilities	The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community.	Noted. There is no requirement in the proposed policy for healthcare buildings to be marketed for 6 months prior to disposal. This requirement relates to community facilities, not health care buildings.	No	No
	Org.	NHS Property Services	Site					
	Agent							
D24	Rep'r	Mr Tom Clarke	Policy	Policy HC3: Community, Health and Education Facilities	Support and welcome the policy wording in relation to protecting valued facilities, we consider the marketing period of 6 months to be insufficient. This would not , for example, be enough time for a community group to fundraise to take on a facility. Other Local Plans require 12 months, although Theatres Trust considers 18-24 months to be optimum. As a result we consider that the policy would not guard against unnecessary loss as set out in the NPPF. Would be beneficial for policy to make clear marketing should be undertaken through appropriate, recognised channels and that the asking price must be reflect of the existing use, to avoid market manipulation.	The Councils recognise that wording changes as proposed could strengthen the policy to protect existing facilities but consider the policy as drafted is sound. However, the Councils do agree that a modification is required to amend the reference to the correct part of the policy, as follows: 6.22 Applications reliant upon criterion d) (2) (a), should…	Yes	No
	Org.	Theatres Trust	Site				MA16	
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Para 6.22 erroneously refers to criterion d, where as it should be a, under part 2.			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HC4: Purpose built places of worship and/or religious instruction					Count of Representations against this policy/section:		2
D02.29	Rep'r	Emily Hrycan	Policy	Policy HC4: Purpose built places of worship and/or religious instruction	The Plan must be read as a whole. Policy EN13 will ensure that developments avoid harm to the historic environment.	No	No
	Org.	Historic England	Site				
	Agent						
				The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Any new purpose-built places of worship or religious instruction should not harm a heritage asset. This change will reflect the requirements of national policy on this matter. HC4 to be amended to include reference to other policies of the Plan or "avoiding harm to the historic environment".			
D16.21	Rep'r	Mrs Lindsay Alder	Policy	Policy HC4: Purpose built places of worship and/or religious instruction	Noted	No	Yes
	Org.	National Highways	Site				
	Agent						
				It is identified in paragraph 6.32 that "any proposed place of worship will avoid or minimise the effect on traffic flow and highway safety in line with Policy ST2". Therefore, if any sites come forward which demonstrate an adverse impact on the highway network whilst potentially affecting the SRN, National Highways should be consulted to allow input into any potential mitigation measures to alleviate this.			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HC5: Provision of new open space, sport and recreation facilities						Count of Representations against this policy/section:		4
B65.6	Rep'r	Messrs Rankin, Patel and Briggs	Policy	Policy HC5: Provision of new open space, sport and recreation facilities	Policy HC5 is unsound because it does not provide explicit support for larger developments that provide open space in excess of local plan requirements. Policy should be revised to state that where provision of new open space is proposed in excess of local plan requirements, this will be taken as a material consideration in favour of planning applications for residential development.	It is not considered necessary to make such an alteration to the policy as the policy is considered robust and encompassing. Any Open Space provision that goes beyond the requirements as set out within the emerging Local Plan will be weighed as part of the Planning balance if an application is made.	No	Yes
	Org.	Private Individual	Site					
	Agent							
D02.30	Rep'r	Emily Hrycan	Policy	Policy HC5: Provision of new open space, sport and recreation facilities	Any new open space, sport or recreation development should not harm a heritage asset. Proposed amendment to include "avoiding harm to the historic environment".	The Local Plan should be read as a whole, and as such, it is considered that the protections afforded by Policy EN13 will ensure that harm to the historic environment is avoided if Policy HC5 is triggered as a result of a Planning Application.	No	No
	Org.	Historic England	Site					
	Agent							
D16.22	Rep'r	Mrs Lindsay Alder	Policy	Policy HC5: Provision of new open space, sport and recreation facilities	Noted that if any new or redeveloped sites come forward where there may be an impact on the Strategic Road Network (SRN) due to an increase in vehicle movements, it is expected that National Highways be consulted.	Comments noted. Where appropriate, National Highways will be consulted as a statutory consultee at the Planning Application stage for proposals for new Open Space, Sports & Recreation Facilities.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D26.09	Rep'r	Ms Rachel Whitaker	Policy	Policy HC5: Provision of new open space, sport and recreation facilities	The Plan evidence base should include a robust and up-to-date assessment of open space requirements and opportunities, with policies and proposals to remedy any deficiencies. In assessing greenspace provision, consideration should be given to the quality and accessibility of space, as well as the various uses that may need separate provision such as children's play space, opportunities for connecting with nature, formal sports areas and facilities for groups with a variety of needs. Open space provision can use Natural England's Accessible Greenspace Standards to determine needs based on size, proximity capacity and quality. 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.	It is considered that the Central Lancashire Open Space Study and Central Lancashire Playing Pitch Strategy provides a robust evidence base and that Policy HC5, and also HS5, has been drafted in a manner to remedy identified deficiencies. It is noted that Natural England's Accessible Greenspace Standard can be used when assessing open space provision.	No	No
	Org.	Natural England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HC6: Protection of existing open space, sport and recreation facilities					Count of Representations against this policy/section:		1
B11	Rep'r	Mr Anthony Sudell	Policy	Policy HC6: Protection of existing open space, sport and recreation facilities	In Policy HC6 there is an ambiguity in terms of the “and” and “or” which describe which criteria need to be satisfied. It needs to be clarified whether the requirement is for: (A or B or C) plus D Or A or B or (C plus D). The former is preferable.	The supporting text explains that requirements A, B and C reflect national policy and that D is an additional requirement and should be applied to all relevant proposals.	No	No
	Org.	Private Individual	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy HC7: Cemeteries and crematoria						Count of Representations against this policy/section:		1
A40.1	Rep'r	Miss Claire Parker	Policy	Policy HC7: Cemeteries and crematoria	It is expected that there may be a capacity shortfall within the plan period and a lack of cemetery provision for residents in north Preston. The representation identifies 4no. omission sites for potential allocation as HC3 and/or HC7 within Preston. The omission sites are considered to be ready and available and through allocation and would support long-term provision across the plan period for Preston. Omission sites are as follows: 1. Land to west of A6 Garstang Road 2. Land at D'Urton Lane 3. Land at D'Urton Lane / east of James Towers Way with site of approved place of worship directly to the south 4. Land by Ambulance Station, Broughton	The allocation of the land at Preston Cemetery and Crematorium is sufficient to meet the forecasted burial need for Preston. No additional evidence has been supplied with the representation to support the suggested forecasted capacity shortfall. Through Policy HC7, the Councils recognise that where forecasted burial need cannot be met through extension of existing sites, future proposals for new burial / cremation sites will be supported where proposals meet the tests as set out within Criteria 3 and Criteria 4 of the policy.	No	Yes
	Org.	Cassidy and Ashton	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)			Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN1 (Strategic Policy): Well Designed Places						Count of Representations against this policy/section:		17
A06.07	Rep'r	Maple Grove Developments	Policy	Policy EN1 (Strategic Policy): Well Designed Places	Policy EN1 criterion 4 goes beyond the requirements sets out within the various site allocation proformas and would not be appropriate for all schemes/proposals. Further, what constitutes a 'significant scheme' is not defined within the Plan.	The CLLP strives for the highest design quality standards for all developments. It is reasonable to require tools such as Design Codes and Masterplans to help achieve this where appropriate. Modifications (MA40 + MA41) are proposed to the glossary to define 'Major development' and 'Significant major development'. Major development proposals: Residential/student accommodation schemes of between 10 and 49 units or, where the number of dwellings is not specified, a site area of between 0.5 and 2.499 hectares; Retail, commercial and industrial schemes with a floor space of between 1000sqm and 1999sqm, or on sites of between 1 hectare and 1.999 hectares; Educational, hospital, leisure and recreation schemes on sites of between 1 hectare and 1.999 hectares; Schemes with 2 or more land uses on sites of between 1 hectare and 1.499 hectares; Changes of use of building(s) with a gross floor area of between 1,000 square metres and 1,499 square metres. Significant major development proposals: Residential/student accommodation schemes of over 50 units;	Yes MA40 MA41	Yes
	Org.	Maple Grove Developments	Site					
	Agent	Mr Paul Newton						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						Retail, commercial and industrial schemes with a floors pace of 2000 square metres or more on sites of 2 hectares or more; Educational, hospital, leisure and recreational schemes on sites of 2 hectares or more; Schemes with 2 or more land uses on sites of 1.5 hectares or more; Changes of use of building(s) with a gross floor area of 1,500 square metres or more; Any schemes requiring an Environmental Impact Assessment.		
A24.8	Rep'r Org. Agent	Mrs Joanne Harding Home Builders Federation	Policy Site	Policy EN1 (Strategic Policy): Well Designed Places	The Nationally Described Space Standards (NDSS) can only be introduced where the need is justified in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Accordingly, the councils need to provide appropriate justification.	The councils have produced a topic paper justifying the need for NDSS. The Paper examines performance against the NDSS Gross Internal Area, bedroom widths and floor area metrics. The study was based on the 'sound' approach taken by Cheshire East council (2022) and found high rates of non-compliance for affordable housing in particular. The study's findings are consistent with RIBA's Case for Space (2011) and Homewise Report (2015) which found that in both 2011 and 2015, the average new three bed home fell below NDSS for GIA, particularly in the Northwest. The Plan's Viability Assessment has modelled the impact of NDSS, concluding its impact upon viability would be limited.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A26.6	Rep'r Org. Agent	Miss Georgina Cox Gladman Developments	Policy Site	Policy EN1 (Strategic Policy): Well Designed Places	Gladman suggest that criteria 4 & 5 is removed from Policy EN1. Reference to 'design codes' as represent an unnecessary layer of additional submission requirements for developers and a strong likelihood of unnecessary repetition at additional cost to developers. For any site-specific design aspirations, it would be more appropriate to outline these as key development considerations for allocations.	The CLLP strives for the highest design quality standards for all developments. It is reasonable to require tools such as Design Codes and Masterplans to help achieve this where appropriate.	Yes MA40 MA41	Yes
A38.2	Rep'r Org. Agent	Taylor Wimpey UK Limited Taylor Wimpey UK Limited Ms Alexandra Gavi	Policy Site	Policy EN1 (Strategic Policy): Well Designed Places	Part 4 of this policy is vague and requires refinement to confirm what would be considered a 'significant scheme'. Encourages the Council to confirm whether the requirements should be applied to the strategic site allocations only. Where masterplans have previously been submitted and approved as part of a planning permission, the policy wording should be updated and made clear that reserved matters submissions should accord with the approved masterplan, and no duplicate/revisions to the masterplan would be required.	Modifications (MA40 + MA41) are proposed to the glossary to define 'Major development' and 'Significant major development'. Major development proposals: Residential/student accommodation schemes of between 10 and 49 units or, where the number of dwellings is not specified, a site area of between 0.5 and 2.499 hectares; Retail, commercial and industrial schemes with a floor space of between 1000sqm and 1999sqm, or on sites of between 1 hectare and 1.999 hectares; Educational, hospital, leisure and recreation schemes on sites of between 1 hectare and 1.999 hectares; Schemes with 2 or more land uses on sites of between 1 hectare and 1.499 hectares; Changes of use of building(s) with a gross floor area of between 1,000 square metres and 1,499 square metres.	Yes MA40 MA41	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				Significant major development proposals: Residential/student accommodation schemes of over 50 units; Retail, commercial and industrial schemes with a floors pace of 2000 square metres or more on sites of 2 hectares or more; Educational, hospital, leisure and recreational schemes on sites of 2 hectares or more; Schemes with 2 or more land uses on sites of 1.5 hectares or more; Changes of use of building(s) with a gross floor area of 1,500 square metres or more; Any schemes requiring an Environmental Impact Assessment. It is unnecessary to confirm that Reserved Matters applications should accord with masterplans as this is usually secured by Planning Condition.		
A39.8	Rep'r Castle Green Homes Org. Castle Green Homes Agent Mrs Kerry Walker	Policy Site	Policy EN1 (Strategic Policy): Well Designed Places	It is unreasonable to expect all major developments to achieve a green light against all criteria in BHL assessments. The Nationally Described Space Standards (NDSS) can only be introduced where the need is justified in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Accordingly, the councils need to provide appropriate justification. Criteria 4 of the Policy needs to be removed. There is no definition of a	The CLLP strives for the highest design quality standards for all developments. BHL assessments are essential tools to help achieve this. The councils have produced a topic paper justifying the need for NDSS. The Paper examines performance against the NDSS Gross Internal Area, bedroom widths and floor area metrics. The study was based on the 'sound' approach taken by Cheshire East Council (2022) and found high rates of non-compliance for affordable housing in particular. The	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			'significant' scheme. Masterplans are irrelevant for detailed planning applications.	study's findings are consistent with RIBA's Case for Space (2011) and Homewise Report (2015) which found that in both 2011 and 2015, the average new three bed home fell below NDSS for GIA, particularly in the Northwest. The Plan's Viability Assessment has modelled the impact of NDSS, concluding its impact upon viability would be limited. Modifications (MA40 + MA41) are proposed to the glossary to define 'Major development' and 'Significant major development'. Major development proposals: Residential/student accommodation schemes of between 10 and 49 units or, where the number of dwellings is not specified, a site area of between 0.5 and 2.499 hectares; Retail, commercial and industrial schemes with a floor space of between 1000sqm and 1999sqm, or on sites of between 1 hectare and 1.999 hectares; Educational, hospital, leisure and recreation schemes on sites of between 1 hectare and 1.999 hectares; Schemes with 2 or more land uses on sites of between 1 hectare and 1.499 hectares; Changes of use of building(s) with a gross floor area of between 1,000 square metres and 1,499 square metres. Significant major development proposals: Residential/student accommodation		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						schemes of over 50 units; Retail, commercial and industrial schemes with a floorspace of 2000 square metres or more on sites of 2 hectares or more; Educational, hospital, leisure and recreational schemes on sites of 2 hectares or more; Schemes with 2 or more land uses on sites of 1.5 hectares or more; Changes of use of building(s) with a gross floor area of 1,500 square metres or more; Any schemes requiring an Environmental Impact Assessment.		
A41.1	Rep'r Org. Agent	Rowland Homes Limited Rowland Homes Limited Mr Brian O Connor	Policy Site	Policy EN1 (Strategic Policy): Well Designed Places	The Nationally Described Space Standards (NDSS) can only be introduced where the need is justified in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Accordingly, the councils need to provide appropriate justification.	The councils have produced a topic paper justifying the need for NDSS. The Paper examines performance against the NDSS Gross Internal Area, bedroom widths and floor area metrics. The study was based on the 'sound' approach taken by Cheshire East council (2022) and found high rates of non-compliance for affordable housing in particular. The study's findings are consistent with RIBA's Case for Space (2011) and Homewise Report (2015) which found that in both 2011 and 2015, the average new three bed home fell below NDSS for GIA, particularly in the Northwest. The Plan's Viability Assessment has modelled the impact of NDSS, concluding its impact upon viability would be limited.	No	Yes

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A45.9	Rep'r	Taylor Wimpey UK Limited	Policy	Policy EN1 (Strategic Policy): Well Designed Places	Taylor Wimpey is concerned that the Council anticipates significant advancements to secure approval for each of the Building for a Healthy Life criteria, specifies that every new residence must adhere to the nationally defined space standards and elevated water efficiency standards. Overly prescriptive policies should be avoided, and viability implications should be considered. 'Significant schemes' needs refinement.	Optional Technical Standards and BHL have been tested within the CLLP the viability assessment. Modifications (MA40 + MA41) are proposed to the glossary to define 'Major development' and 'Significant major development'. Major development proposals: Residential/student accommodation schemes of between 10 and 49 units or, where the number of dwellings is not specified, a site area of between 0.5 and 2.499 hectares; Retail, commercial and industrial schemes with a floor space of between 1000sqm and 1999sqm, or on sites of between 1 hectare and 1.999 hectares; Educational, hospital, leisure and recreation schemes on sites of between 1 hectare and 1.999 hectares; Schemes with 2 or more land uses on sites of between 1 hectare and 1.499 hectares; Changes of use of building(s) with a gross floor area of between 1,000 square metres and 1,499 square metres. Significant major development proposals: Residential/student accommodation schemes of over 50 units; Retail, commercial and industrial schemes with a floors pace of 2000 square metres or more on sites of 2 hectares or more; Educational, hospital, leisure and	Yes MA40 MA41	Yes
	Org.	Taylor Wimpey UK Limited	Site					
	Agent	Megan Wilson						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						recreational schemes on sites of 2 hectares or more; Schemes with 2 or more land uses on sites of 1.5 hectares or more; Changes of use of building(s) with a gross floor area of 1,500 square metres or more; Any schemes requiring an Environmental Impact Assessment.		
A60.9	Rep'r Org. Agent	Ms Ashleigh Genco Story Homes Mr Dan Mitchell	Policy Site	Policy EN1 (Strategic Policy): Well Designed Places	The Nationally Described Space Standards (NDSS) can only be introduced where the need is justified in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Accordingly, the councils need to provide appropriate justification.	The councils have produced a topic paper justifying the need for NDSS. The Paper examines performance against the NDSS Gross Internal Area, bedroom widths and floor area metrics. The study was based on the 'sound' approach taken by Cheshire East council (2022) and found high rates of non-compliance for affordable housing in particular. The study's findings are consistent with RIBA's Case for Space (2011) and Homewise Report (2015) which found that in both 2011 and 2015, the average new three bed home fell below NDSS for GIA, particularly in the Northwest. The Plan's Viability Assessment has modelled the impact of NDSS, concluding its impact upon viability would be limited.	No	Yes
A61.8	Rep'r Org. Agent	Mr Rob Haslam Harworth Estates Mr Brian O Connor	Policy Site	Policy EN1 (Strategic Policy): Well Designed Places	Harworth has no issues in principle with the requirements of Policy EN1, provided it is established that the process should be led by the applicant and master developer for the site and can be agreed during the planning application determination period rather than prior to submission.	Noted.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A63.2	Rep'r	PWA Planning	Policy	Policy EN1 (Strategic Policy): Well Designed Places	All major residential developments to achieve a 'green light' against all Building for a Healthy Life (BHL) criteria is too rigid and prevents site specific flexibility. It is not clear what 'significant schemes' refers to as there is no definition provided. Masterplanning and design codes should only be required for truly large or complex developments.	The CLLP strives for the highest design quality for all developments. BHL is an important to tool to help achieve this. Modifications (MA40 + MA41) are proposed to the glossary to define 'Major development' and 'Significant major development'. Major development proposals: Residential/student accommodation schemes of between 10 and 49 units or, where the number of dwellings is not specified, a site area of between 0.5 and 2.499 hectares; Retail, commercial and industrial schemes with a floor space of between 1000sqm and 1999sqm, or on sites of between 1 hectare and 1.999 hectares; Educational, hospital, leisure and recreation schemes on sites of between 1 hectare and 1.999 hectares; Schemes with 2 or more land uses on sites of between 1 hectare and 1.499 hectares; Changes of use of building(s) with a gross floor area of between 1,000 square metres and 1,499 square metres. Significant major development proposals: Residential/student accommodation schemes of over 50 units; Retail, commercial and industrial schemes with a floors pace of 2000 square metres or more on sites of 2 hectares or more; Educational, hospital, leisure and	Yes MA40 MA41	Yes
	Org.	PWA Planning	Site					
	Agent	Mr Paul Walton						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				recreational schemes on sites of 2 hectares or more; Schemes with 2 or more land uses on sites of 1.5 hectares or more; Changes of use of building(s) with a gross floor area of 1,500 square metres or more; Any schemes requiring an Environmental Impact Assessment.		
A67.8	Rep'r L&Q Org. L&Q Agent Mr Phil Robinson	Policy Site	Policy EN1 (Strategic Policy): Well Designed Places	It is unreasonable to expect all major developments to achieve a green light against each of the BHL considerations. The Nationally Described Space Standards (NDSS) can only be introduced where the need is justified in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The Councils need to provide appropriate justification for a higher water efficiency standard than that specified n PPG. There is no definition of 'significant scheme in criterion 4 of the policy.	The CLLP strives for the highest design quality for all developments. BHL is an important to tool to help achieve this. The councils have produced an Optional Technical Standards topic paper (TP05) justifying the need for NDSS and water efficiency standards. The Paper examines performance against the NDSS Gross Internal Area, bedroom widths and floor area metrics. The study was based on the 'sound' approach taken by Cheshire East council (2022) and found high rates of non-compliance for affordable housing in particular. The study's findings are consistent with RIBA's Case for Space (2011) and Homewise Report (2015) which found that in both 2011 and 2015, the average new three bed home fell below NDSS for GIA, particularly in the Northwest. The Plan's Viability Assessment has modelled the impact of NDSS, concluding its impact upon viability would be limited. Appendix 2 of TP05 contains a representation from a consortium of water companies advising that the CLLP area suffers from water stress.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				Modifications (MA40 + MA41) are proposed to the glossary to define 'Major development' and 'Significant major development'. Major development proposals Residential/student accommodation schemes of between 10 and 49 units or, where the number of dwellings is not specified, a site area of between 0.5 and 2.499 hectares; Retail, commercial and industrial schemes with a floor space of between 1000sqm and 1999sqm, or on sites of between 1 hectare and 1.999 hectares; Educational, hospital, leisure and recreation schemes on sites of between 1 hectare and 1.999 hectares; Schemes with 2 or more land uses on sites of between 1 hectare and 1.499 hectares; Changes of use of building(s) with a gross floor area of between 1,000 square metres and 1,499 square metres. Significant major development proposals Residential/student accommodation schemes of over 50 units; Retail, commercial and industrial schemes with a floorspace of 2000 square metres or more on sites of 2 hectares or more; Educational, hospital, leisure and recreational schemes on sites of 2 hectares or more; Schemes with 2 or more land uses on sites of 1.5 hectares or more; Changes of use of building(s) with a		

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						gross floor area of 1,500 square metres or more; Any schemes requiring an Environmental Impact Assessment.		
D02.11	Rep'r	Emily Hrycan	Policy	Policy EN1 (Strategic Policy): Well Designed Places	Historic England support this policy. No suggested amendments.	Noted.	No	No
	Org.	Historic England	Site					
	Agent							
D02.31	Rep'r	Emily Hrycan	Policy	Policy EN1 (Strategic Policy): Well Designed Places	REPRESENTATION DELETED AS DUPLICATE	REPRESENTATION DELETED AS DUPLICATE	No	No
	Org.	Historic England	Site					
	Agent							
D11.7	Rep'r	Rebecca Housam	Policy	Policy EN1 (Strategic Policy): Well Designed Places	The policy is not consistent with National Policy (para 16(d) of the NPPF). The policy wording should be changed to make clear that Nationally Described Space Standards (NDSS) are only applicable to new-build dwellings, and not new dwellings created by the repurposing of an existing building. This is particularly important for listed buildings (Fulwood Barracks) for example.	The policy wording is considered to be consistent with national policy and no changes necessary. If evidence can be provided to demonstrate that using the NDSS for this specific site is unviable/unfeasible, then this will be discussed as part of the masterplanning of the site.	No	Yes
	Org.	Defence Infrastructure Organisation	Site					
	Agent							
D12.8	Rep'r	Richard Sharples	Policy	Policy EN1 (Strategic Policy): Well Designed Places	LCC recommends that Policy EN1 specifically reflects the feedback and insight previously gained through consultation with people living with dementia, and as noted in the 2019/20	SRBC have a Dementia Charter; this encourages business, community groups, services and public sector organisations to become part of a Charter Community to ensure that	No	No
	Org.	Lancashire County Council	Site					

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent				Outcome Report, particularly in relation to the implementation of dementia-friendly design principles (e.g., clear readable signage and simple housing layouts, pg. 7). The RTPI Dementia and Town Planning Report explicitly references the work undertaken by Central Lancashire to consult with people living with dementia and recognising that supporting people with dementia is a key priority of South Ribble Council in particular.	South Ribble's town centres and attractions are dementia friendly. Members of that community pledge to consider dementia when considering new policies and strategies, and how town centres are designed. Policy EN1 confirms developments should create high quality and sustainable buildings and places, consistent with the ten characteristics of the National Design Guide and major residential schemes should meet the criteria in Building for a Healthy Life. Policy EN2 sets out its design criteria for new development, whilst HC1 requires new development to achieve inclusive, safe and healthy places – and this can encompass a variety of differing needs. It is considered that the design policies as drafted are sound and no specific reference to dementia is needed within the current policies.		
D15.16	Rep'r	Andrew Leyssens	Policy	Policy EN1 (Strategic Policy): Well Designed Places	Supportive of criterion 3 of Policy EN1 but do recommend amendments. Policy EN1 should be amended as follows: 3. All new dwellings must comply with the nationally described space standards, and higher water efficiency standards (currently equivalent to 110 litres/person/day). All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM	Change not considered necessary due to the impact on viability.	No	Yes
	Org.	United Utilties	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					‘Excellent’ standard.			
D16.23	Rep'r	Mrs Lindsay Alder	Policy	Policy EN1 (Strategic Policy): Well Designed Places	The Local Plan identifies the aspects of sustainability that can be achieved through well-designed place-making. This aligns with the approach of National Highways, who advocate a ‘vision-led’ approach to development. The Planning for the Future (2023) guide identifies this in detail.	Noted - the three LPA’s will continue to engage and consult with National Highways where necessary to establish well-designed place-making.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN2: Design Criteria for New Development				Count of Representations against this policy/section:	6			
A24.9	Rep'r	Mrs Joanne Harding	Policy	Policy EN2: Design Criteria for New Development	Policy EN2 is not considered to be sound as it is not justified, not effective and not consistent with national policy. This policy states that all major development amending existing or proposing new streets and open spaces should be climate change resilient, be designed in line with Manual for Streets and include street trees amongst other criteria. The HBF considers that it will be important for the Council to gather appropriate evidence in relation to this policy that considers its practical implementation, and how it sits alongside other plan requirements.	The councils consider the policy to be compliant with national policy. The CLLP strives for the highest level of design. It is in developers own interests to achieve high-quality, well-placed design as this adds value (as is demonstrated by the Building Better, Building Beautiful Commission report (January 2020). Well-designed place should therefore add to value and make development more viable.	No	Yes
	Org.	Home Builders Federation	Site					
	Agent							
A41.2	Rep'r	Rowland Homes Limited	Policy	Policy EN2: Design Criteria for New Development	Policy EN2 is not effective: As currently worded the Policy is too vague (in particular parts f and h) and it is not clear how developers should address compliance with the Policy.	Policy is considered effective. The councils expect to prepare design guidance following adoption of the plan.	No	Yes
	Org.	Rowland Homes Limited	Site					
	Agent	Mr Brian O Connor						
A60.10	Rep'r	Ms Ashleigh Genco	Policy	Policy EN2: Design Criteria for New Development	It is important to ensure that flexibility is applied to design criteria in a way that enables a subjective assessment on a site-by-site basis. Questions whether the inclusion of the term “be climate change resilient” has been appropriately justified. Also have concerns with the proposed approach of giving priority to people over vehicles as part of all major development schemes.	It is in developers own interests to achieve high-quality, well-placed design as this adds value (as is demonstrated by the Building Better, Building Beautiful Commission report (January 2020). Well-designed place should therefore add to value and make development more viable.	No	Yes
	Org.	Story Homes	Site					
	Agent	Mr Dan Mitchell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A61.9	Rep'r	Mr Rob Haslam	Policy	Policy EN2: Design Criteria for New Development	Policy EN2 is not effective - the Policy should provide further guidance on how the public realm can be climate change resilient to effectively assess proposed developments against the policy.	Policy is considered effective. The councils expect to prepare design guidance following adoption of the plan.	No	Yes
	Org.	Harworth Estates	Site					
	Agent	Mr Brian O Connor						
D02.32	Rep'r	Emily Hrycan	Policy	Policy EN2: Design Criteria for New Development	Historic England support this policy. No amendments suggested.	Noted.	No	No
	Org.	Historic England	Site					
	Agent							
D18.3	Rep'r	Mr David Dunlop	Policy	Policy EN2: Design Criteria for New Development	Policy considered to be unsound as it commits only to enhance the site's existing natural assets, whereas it should set out to enhance and expand the sites natural assets to comply with the Environment Act 2021.	It is considered that the local plan complies with requirements set out in the Environment Act 2021. To comply with the enhanced Biodiversity Duty introduced by the Environment Act 2021, government guidance stipulates that 'public authorities who operate in England must consider what they can do to conserve and enhance biodiversity in England'. It is considered that the policy wording is therefore compliant and sound, as it is written. Policy EN2 is in relation only to the design criteria for new development, it may not be possible for development sites to expand on the area of green infrastructure or biodiversity on-site owing to site constraints, development requirements and viability. It is envisioned that the expansion of biodiversity and green infrastructure will be delivered through other, related mechanisms such as Biodiversity Net	No	No
	Org.	The Wildlife Trust for Lancashire, Manchester & North Merseyside	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				Gain and Local Nature Recovery Strategies. 'Enhance' in the policy does not rule out the expansion of natural assets, in accordance with the Lawton Principles of 'more, bigger, better and joined up'; i.e. an expansion of a natural asset on a development site may be seen as enhancement of that asset. Furthermore, the local plan is to be read as a whole, and policies EN5, EN6, EN7 and EN8 collectively refer to the protection, enhancement and delivery of an overall net increase in biodiversity and green infrastructure, where appropriate.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN3: Tall Buildings						Count of Representations against this policy/section:		2
D02.33	Rep'r	Emily Hrycan	Policy	Policy EN3: Tall Buildings	Historic England support this policy. No amendments suggested.	Noted.	No	No
	Org.	Historic England	Site					
	Agent							
D13.4	Rep'r	Mr Geoff Lavery	Policy	Policy EN3: Tall Buildings	Policy EN3 para 3(g) supports the requirements for health infrastructure for the level of growth proposed in the plan.	Noted.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN4: Amenity				Count of Representations against this policy/section: 3		
A61.13	Rep'r Mr Rob Haslam Org. Harworth Estates Agent Mr Brian O Connor	Policy Policy EN4: Amenity Site	Policy EN4 sets out measures to protect and where possible enhance residential amenity. The representation refers specifically to amenity considerations for development of Preston West. Policy EN4 is not justified: no technical work has been undertaken to support the draft allocation SS5 which demonstrates that there should be any obligation for a development buffer from key routes such as the strategic road network, canal and railway line. Flexibility should therefore be incorporated into the policy to respond to the outcome of detailed technical work which may demonstrate that no buffer is required or to allow for alternative forms of mitigation.	No changes proposed to Policy EN4. These issues can be addressed through the masterplanning process for Preston West.	No	Yes
D02.34	Rep'r Emily Hrycan Org. Historic England Agent	Policy Policy EN4: Amenity Site	Historic England support this policy. No amendments suggested.	Noted.	No	No
D15.17	Rep'r Andrew Leyssens Org. United Utilties Agent	Policy Policy EN4: Amenity Site	Criterion 3 of Policy EN4 should be amended as follows: 3. Developments should be sited and designed to ensure that they would not have a significant negative impact on the operation of adjacent businesses and/or facilities ('Agent of change' principle). 'New development should ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely	The changed approach does not recognise role of agent of change in development, as such the existing text is not proposed to be changed	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			affected by nearby uses and vice versa. When applicable, applicants will be required to submit the relevant impact assessments, outlining any adverse effects from the nearby site, and any required mitigation.'			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN5: Green Infrastructure						Count of Representations against this policy/section:		14
A04.4	Rep'r	Cardinal Newman College	Policy	Policy EN5: Green Infrastructure	Representation objects to the inclusion of grounds at Cardinal Newman College being included in the Green Infrastructure designation under Policy EN5, as it is considered inappropriate. The designation is considered to cause conflict with future development plans to expand the college.	The Policy EN5 Green Infrastructure designation rolls forward the adopted Preston Local Plan Policy EN2 Green Infrastructure designation at Cardinal Newman College, covering existing greenspace. An area of Green Infrastructure at the site is covered by Tree Preservation Orders TPO/1994/0007 and TPO/1995/0001. The site contains a high number of mature trees and a pond. The College obtained full planning permission in May 2022 for a proposed multi use games area with bleacher seating. The proposed Green Infrastructure designation of Policy EN5 is therefore considered to be appropriate.	No	Yes
	Org.	Cardinal Newman College	Site					
	Agent	Mrs Helen Binns						
A12.7	Rep'r	Tallentine	Policy	Policy EN5: Green Infrastructure	EN5 Green Infrastructure has the potential to constrain deliverability. The Policies Map should be updated.	The Plan allocates sufficient land for housing and employment growth without the need to review the area's provision of Green Infrastructure.	No	Yes
	Org.	Tallentine	Site					
	Agent	Mr Jonathan Ainley						
A26.7	Rep'r	Miss Georgina Cox	Policy	Policy EN5: Green Infrastructure	Gladman question the inclusion of criterion 3 (d) on the basis that requirements for the submission of a HMMP and/or LEMP are generally enforced by way of a planning condition or section 106 agreement to ensure that BNG and/or on-site Green Infrastructure is secured. Criterion 3(d) is therefore considered to be an unnecessary arm to the policy and should be removed.	The council recognises the concerns of the representation. However, not all provision of green infrastructure will be related or secured via Biodiversity Net Gain (BNG).The requirement for an HMMP for Green Infrastructure (GI) captures more widely any provisions made that are classed as GI that may not be captured by biodiversity net gain, such as allotments, community gardens and amenity space.	No	Yes
	Org.	Gladman Developments	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						Any GI that does contribute towards, and is captured by BNG, is likely to require a HMMP to secure, and therefore would meet the requirement of Policy EN5 by default; therefore criterion 3 (d) is not considered to be an unnecessary addition. The policy wording is considered sound.		
A55.6	Rep'r Org. Agent	Ms Sophie Eaton Redrow Homes	Policy Site	Policy EN5: Green Infrastructure EN5.1	Redrow consider that the Harrison's Farm allocation for Green Infrastructure is inappropriate and should be safeguarded for development to meet future housing need. The representation argues that the site qualifies as 'grey belt' or 'infill land', no longer serves function as Green Belt, and would be suited to housing development given its location and surrounding land uses. The representation understands that the allocation for cemetery provision/extension and allotments is justified, however the remaining allocation for off-site Biodiversity Net Gain would compromise the delivery of sustainable and strategic housing; and the remainder of the site should be prioritised for residential development.	It is considered that the site at Harrisons Farm is required to provide off-site Biodiversity Net Gain in the borough, as it is a highly suitable site for habitat enhancement and offers a significant opportunity for BNG owing to its size, access, existing habitat types and conditions. The on-site potential for Biodiversity Unit (BU) uplift allows for habitat banking on the site to be cost-effective, and low-risk for the council to pursue, compared to other sites under council ownership that are being considered for Habitat Banking. Alternative sites under council ownership that have been considered for off-site BNG are of a smaller size and offer less potential quantity of BUs, and therefore have increased risk for the council to pursue for habitat banking (e.g. to make a return from unit sale/allocation that will cover costs of ongoing management, admin and work associated with setting up the site as a habitat bank) Further, there is significant uncertainty and unknown risk associated with BNG and Habitat Banking, associated with its	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				'newness'; given these risks, it is in the interest of the council to prioritise Habitat Banking on lower risk sites, which land at Harrisons Farm offers. The Harrisons Farm site also offers the potential to create a diversity of habitat types therefore a range of BU types can be delivered (e.g. grassland, scrub, woodland, pond, individual trees and hedgerows). A diversity and abundance of BUs is required locally to support council developments and private developments requiring off-site units in the borough, and in SRBC and Preston. The cemetery extension and the allotment provision proposed at the site will likely require off-site BUs to meet their 10% gain objective. The use of the remainder of the site as a Habitat Bank will provide these off-site units as local to the development sites as possible and will negate the need for Chorley Council to purchase off-site units from a private provider at greater expense. Currently there is no provision of off-site units in Central Lancashire; a habitat bank at Harrisons Farm would provide an essential source of BUs to support development in the short term, until the local (and national) off-site BNG market matures. A high-level assessment of the allocation sites in Chorley, within the draft CLLP, identified a significant need for off-site BUs. Land at Harrisons Farm would provide some of this requirement and		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						enable local development to resort to affordable off-site units and deliver on the development needs on-site (e.g. affordable housing). It is noted that BNG and the off-site BU market adds new 'competition' for land use over development. It is anticipated that contest for sites will occur that may be suitable for a number of uses such as BNG & development, and land at Harrisons Farm is an example of this. Once the off-site BU market has established and matured, and BUs are more readily available locally and nationally to meet demand, it is expected this conflict will be reduced. Lastly, it is considered that sufficient sites have been identified to meet the housing requirement of the draft local plan, and the allocation of land at Harrisons Farm for housing is considered of lower priority than supporting wider development to meet the needs of statutory BNG.		
A56.2	Rep'r	Reaper Limited and Hulton Land Ltd	Policy	Policy EN5: Green Infrastructure	Reaper Ltd express an interest in allocating part of a site located at Land off Longridge Road, Grimsargh as a BNG Habitat Bank. The representation expresses that the CLLP has insufficient allocation for off-site BNG to meet the development requirements.	The concerns of the representation are recognised, and the provision of a Habitat Bank for BNG at the proposed location would be welcomed, as it is recognised that local off-site Biodiversity Units would be required to support local development to meet their 10% gain objective. The allocation for BNG sites in EN5 is not a restrictive or exhaustive list. The provision of habitat banks outside of the	No	Yes
	Org.	Reaper Limited and Hulton Land Ltd	Site					
	Agent	Mr Matthew Symo						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				proposed allocation site in the emerging local plan will be welcomed and supported by the council(s), where appropriate. The off-site Biodiversity Unit market is an open market that allows for each private and council land to be put forward as Habitat Banks, and is regulated by Natural England as opposed to Local Planning Authorities. LPAs have the ability to support habitat banks becoming registered (through provision of appropriate legal agreements), however, councils are not obliged to be involved in the off-site market. As a result, the registration of private sites onto the Biodiversity Gain Site register cannot be prevented by the LPA, nor can the LPA insist that private land to be registered as a Habitat Bank. The council(s) respect the nature of the open market for off-site units, and will act to encourage local provision of Biodiversity Units as local need is recognised.		
A58.3	Rep'r Reaper Limited and Hulton Land Ltd Org. Reaper Limited and Hulton Land Ltd Agent Mr Matthew Symo	Policy Policy EN5: Green Infrastructure Site	The site is currently designated as GI in the South Ribble Local Plan (SRLP). However, it appears as though the SRLP designation was simply carried forward from the previous development plan document as it is not clear from the SRLP evidence base why it is designated as GI. It is assumed that the site was not promoted for development during the SRLP process and as such, the previous GI designation was simply carried forward. It may also be the case that the Council mistakenly considered that it formed part of the GI at the neighbouring	As per para 7.21 of supporting text, Green Infrastructure (GI) offers a range of benefits. These could be as broad as breaking up the urban area to ensure visual amenity, provide habitat and/or respond to climate change. Public access is not a requirement for a GI designation, nor do sites need to fulfil a typology set out in para 7.23. These are simply offered as examples of GI. The Plan allocates sufficient land for	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			children's centre. The site is not Green Infrastructure. It is in private ownership with no public access. There are no Public Rights of Way (PRoW) running through or adjacent to the site which, as stated, is very well contained on all sides meaning it is barely visible from the public domain. At best, there is an appreciation that there is no development to the rear of the properties along Brindle Road and tree canopies are partly visible, but it provides no beneficial amenity in this regard and cannot objectively be considered as GI. The site does not fall under any of the GI typologies listed in the SRLP. It is a field in a large built-up area, but the level of containment and lack of public views means that it cannot reasonably be claimed to be necessary to enhance the appearance of the area. Rather, it is a site that would present the Council with an opportunity for entirely logical infilling between built development.	housing and employment growth without the need to review the area's provision of Green Infrastructure.		
A60.11	Rep'r Ms Ashleigh Genco Org. Story Homes Agent Mr Dan Mitchell	Policy Policy EN5: Green Infrastructure Site	The representation poses concern over the requirement for development proposals to 'prioritise' the protection, quality, connectivity and multi-functionality of green infrastructure, as GI is amongst a number of considerations which need to be considered. The representation states that insufficient	The plan seeks to maintain a network of Green Infrastructure (GI). Its protection would consequently be the councils default position. Tests that could justify loss of GI are set out within Criteria 4. Ultimately, the local plan is to be read as a whole and the statement regarding 'prioritising' GI is not intended to	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					justification has been provided to justify why GI should be prioritised over other considerations.	exclude consideration of other policy.		
B66	Rep'r	Michael Priaulx	Policy	Policy EN5: Green Infrastructure	The representation asks for amendments to the Policy EN5 to provide clarity and consistency on the use of Swift Bricks in development. The proposed amendments are: EN5 3.(e): Incorporate features for the benefit of local wildlife such as integrated swift bricks, bird and bat boxes, hedgerows at plot boundaries and hedgehog highways. (f)Protect existing nest sites for building-dependent species such as swifts and house martins Mitigation should be provided if these nest sites cannot be protected. 7.25 New developments are to consider incorporating green infrastructure by creating wildlife friendly gardens and spaces, such as through incorporating hedgehog highways, and use of native hedgerows instead of fencing at plot boundaries. Additional enhancements shall include the installation of integral bird nest boxes (including swift bricks), bat access panels integrated bat boxes and bee bricks on for new buildings. Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions (where possible), in accordance with best practice guidance	The council notes that the changes could improve the clarity of the policy and supporting text but remains confident that the plan as drafted is sound.	No	Yes
	Org.	Private Individual	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist. Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have better thermal regulation with future climate change in mind.			
C4	Rep'r	Fr Joseph Bibby	Policy	Policy EN5: Green Infrastructure	Land at Leyland St Mary's RC Church should not be designated as Green Infrastructure.	The Plan allocates sufficient land for housing and employment growth. It is therefore unnecessary to review the area's existing provision of Green Infrastructure.	No	Yes
	Org.	St Marys RC Church	Site	19S362				
	Agent	Mr Peter Gilkes						
D02.35	Rep'r	Emily Hrycan	Policy	Policy EN5: Green Infrastructure	The policy is sound subject to changes; it should include reference to the historic environment. The text should be amended to "incorporate diverse green infrastructure that is appropriate to the landscape, does not harm the significance of a heritage asset, reflects the local and historic character, and complements existing green infrastructure;"	It is not considered necessary to add reference to the historic environment into the policy as Policy EN13 deals with the protection of the historic environment. The plan should be read as a whole.	No	No
	Org.	Historic England	Site					
	Agent							
D02.44	Rep'r	Emily Hrycan	Policy	Policy EN5: Green Infrastructure	Object to the policy on the grounds that it is unclear from the text whether the (enabling) development and site allocation will impact on any heritage assets.	Policy EN5 (and EN5.2) confirm that land is allocated in the CLLP for a new 'Central Park', and that residential development is expected to be required to support the viability of the scheme and enable the delivery of the park. It is considered	No	No
	Org.	Historic England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					Text should be amended as outlined in the representation.	that the policy explains this through its current wording. Additional information is also provided through paragraphs 7.30 and 7.31. Any impacts on heritage that may arise as a result of the park's delivery will be considered against other CLLP policies, including EN13. It is not considered necessary to amend policy EN5.		
D04.05	Rep'r Org. Agent	Laura Marchant Homes England	Policy Site	Policy EN5: Green Infrastructure	In principle, the proposed allocation is supported and Homes England are keen to work with the council to deliver the 'Central Parks' concept. However, a modification is necessary to increase the number of dwellings cited in the policy from 125 to 150. This is to enable the site to be viable.	The Councils maintain that 125 dwellings are appropriate to the site. The councils will however continue to work with Homes England on this matter through the examination process.	No	Yes
D11.3	Rep'r Org. Agent	Rebecca Housam Defence Infrastructure Organisation	Policy Site	Policy EN5: Green Infrastructure SS4	The representation has issue with the allocation of land as Green Infrastructure (GI) under EN5, at the Fulwood Barracks site, as this site is also allocated for development, and therefore considered contradictory. The representation proposes that the GI designation of the site is to be removed. The representation clarifies that the existing pitches comprise 1no. 3G mini football pitch and that the tarmac basketball court and 3G tennis court do not meet the definition of a 3G playing pitch because of their dimensions and surfacing respectively. The representation requests that if the policy requirement for retention of these	Part of the site is existing Green Infrastructure as defined in the adopted Preston Local Plan which would be rolled forward in the Local Plan through the Policy EN5 Green Infrastructure designation. This reflects existing green infrastructure and playing fields at the site. Existing open space at the site includes parade grounds, grass and 3G playing pitches, as identified in the Policy SS4 Key Development Considerations. The site contains street trees and wooded areas near the site of an Ancient Battlefield as identified in the Policy SS4 Key Development Considerations. It is therefore considered that it is justified to include the Fulwood Barracks site within the	Yes MA05	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			facilities is to remain, that their description should be clarified to show that there is only 1no. 3G pitch at the site (meeting the 3G playing pitch definition).	Local Plan Policy EN5 Green Infrastructure designation. The representation informs that the Ancient Battlefield is located outside the Policy SS4 site allocation, to the east of the site. It requests that reference to the Ancient Battlefield as being located within the site in paragraph 1 and in the Amenity (EN4) section of the Key Development Considerations (Local Plan page 36) of Policy SS4 is removed or amended to identify it as adjoining the site for accuracy and to avoid confusion – the councils agree with this proposed modification. The existing pitches at the site are a private facility with no wider access and therefore have not been assessed in the Central Lancashire Playing Pitch Strategy and Action Plan – Stage E Report (January 2022, KKP). Any loss of Green Infrastructure, sports pitches or playing fields at the site through development of the Strategic Site Allocation in respect of Policy SS4, would need to be justified at the planning application stage and given technical consideration at the detailed Masterplanning stage, including whether an off-site financial contribution would be required. Removal of the Green Infrastructure designation at the site in the Local Plan would reduce the ability of the council to secure an off-site financial contribution for the provision of open space and the ability of the council to require the loss of the open space to be justified through the provision of		

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				technical information at the planning application stage. The council therefore disagrees with the proposed modification of removing the Policy EN5 Green Infrastructure designation at the site. Proposed modifications (MA07): Page 36, Amenity (EN4): 'Site adjoins includes public open space in the form of where the Battle of Preston occurred the Ancient Battlefield. Access to this is currently restricted due to the operational status of the site. The site includes existing open space which is not accessible by the public in the form of parade grounds, grass, a basketball court, tennis court and a 3g mini football playing pitches.'		
D26.10	Rep'r Ms Rachel Whitaker Org. Natural England Agent	Policy Policy EN5: Green Infrastructure Site	Natural England welcome Policy EN5 that seeks to protect, enhance and manage Central Lancashire Green Infrastructure (GI) network which is bespoke and tailored. The GI network should seek to ensure areas of the network are protected and enhanced, as well as deliver a range of natural capital benefits. Natural England's Green Infrastructure Framework provides evidence-based advice and tools on how to design, deliver and manage GI. GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good	The councils welcome the positive comments from NE on policy EN5.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales. Development should be designed to meet the 15 Green Infrastructure Principles. The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate. GI mapping resources are available. These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision. Natural England advise the blue infrastructure networks listed can also support and align with other natural environment policies, such as those on sustainable drainage systems.			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN6: Biodiversity Net Gain						Count of Representations against this policy/section:		7
A24.10	Rep'r	Mrs Joanne Harding	Policy	Policy EN6: Biodiversity Net Gain	The representation author notes that there is a potential for confusion between each of the mitigation hierarchy, biodiversity gain hierarchy and the Central Lancashire Local Plan BNG delivery hierarchy as set out in the policy. The author states that the council is not to deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act, and the plan should provide certainty for developers and a clear BNG policy with a fixed 10% figure. The author considers that the Local Nature Recovery Strategy (LNRS) is not to restrict development or limit the requirements of BNG and the metric being met, and considers that the Lancashire LNRS, as it emerges, should be kept under review in terms of this local plan.	It is considered that policy EN6 does not deviate from the 10% net gain requirements as set out in the Environment Act and accompanying legislation or planning practice guidance (PPG). The PPG states, at paragraph 001 Reference ID: 74-001-20240214 that developments are to 'deliver at least a 10% increase in biodiversity value'; the local plan policy is consistent with the PPG. The policy wording is considered sound. The concern for confusion around the application of multiple hierarchies around Biodiversity Net Gain is recognised. The councils note that the mitigation and biodiversity gain hierarchies, and their definitions are set by legislation and government guidance and take precedence over local policy; these definitions are included in the supplementary text in the local plan document. The Central Lancashire Local Plan BNG delivery hierarchy is an additional, yet complimentary hierarchy, setting out that off-site BNG compensation, where required, should be delivered locally to the development site in the following sequential order: within the LPA boundary; within Central Lancs; within the National Character Area (NCA); then delivered nationally, with statutory credits used as a last resort. The availability and affordability of off-site Biodiversity Units will be the primary driver of where off-site BNG	No	Yes
	Org.	Home Builders Federation	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						delivery will be delivered, the policy allows for deviation where justification is provided. Therefore, the policy wording is considered sound. The recent government guidance on having regard to the LNRS in plan making has been taken into consideration; each council is involved in the preparation and publication of the Lancashire LNRS as supporting authorities. It is noted, that since the time of writing the draft policy, development of the Lancashire LNRS has progressed, and additional guidance has been published. However, it is considered that the policy wording as written is sound in relation to the LNRS.		
A26.14	Rep'r Org. Agent	Miss Georgina Cox Gladman Developments	Policy Site	Policy EN6: Biodiversity Net Gain	Gladman provide their support for Policy EN6: Biodiversity Net Gain, however, express issue with councils seeking higher than 10% gain and refer to the wording 'Developments must deliver the mandatory Biodiversity Net Gain (BNG) requirement of at least 10% gain…' .	It is considered that policy EN6 does not deviate from the 10% net gain requirements as set out in the Environment Act and accompanying legislation or planning practice guidance (PPG). The PPG states, at paragraph 001 Reference ID: 74-001-20240214 that developments are to 'deliver at least a 10% increase in biodiversity value'; the local plan policy is consistent with the PPG. The policy wording is considered sound.	No	Yes
A39.9	Rep'r Org. Agent	Castle Green Homes Castle Green Homes Mrs Kerry Walker	Policy Site	Policy EN6: Biodiversity Net Gain	Castle Green consider that the Council should adhere to the Government's proposals on biodiversity gain set out in the Environment Act. Castle Green state that if this policy is going to be included within the CLLP then	It is considered that policy EN6 as written is sound and is in accordance with national policy. Policy EN6 provides additional guidance that is complementary to national policy, that are considered not to be restrictive or	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			this is a matter that also needs to be fully considered as part of the site allocation process as it may result in some sites struggling to meet this requirement and not delivering at the density expected, certainly given the age of the density evidence as highlighted previously. Overall, Castle Green consider that this element of the policy is not necessary and provides unnecessary duplication with national policy.	have any significant impact on deliverability of development; it is not considered to duplicate national policy; any repetition of national policy provides the necessary context to the policy and confirms the council is not deviating from the national 10% net gain requirement.		
A60.12	Rep'r Ms Ashleigh Genco Org. Story Homes Agent Mr Dan Mitchell	Policy Policy EN6: Biodiversity Net Gain Site	The representation has issue with the phrasing of the BNG requirements in the policy, particularly the use of 'at least', noting this suggests a quantum greater than the mandatory BNG requirements in the Environment Act 2021. The representation also has issue with the hierarchy set out in the policy, that requires, in sequential order, off-site BNG to be delivered within the LPA, within Central Lancashire, then within the National Character Area (NCA), then nationally. The representation considers that the authorities have insufficient evidence to justify this sequential approach.	It is considered that policy EN6 does not deviate from the 10% net gain requirements as set out in the Environment Act and accompanying legislation or planning practice guidance (PPG). The PPG states, at paragraph 001 Reference ID: 74-001-20240214 that developments are to 'deliver at least a 10% increase in biodiversity value'; the local plan policy is consistent with the PPG. The policy wording is considered sound. The concern for the application of the additional hierarchy for Biodiversity Net Gain is recognised. The Central Lancashire Local Plan BNG delivery hierarchy is an additional, yet complimentary hierarchy, setting out that off-site BNG compensation, where required, should be delivered locally to the development site in the following sequential order: within the LPA boundary; within Central Lancs; within the National Character Area (NCA); then delivered nationally, with statutory credits used as a last resort. The	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				availability and affordability of off-site Biodiversity Units will be the primary driver of where off-site BNG delivery will be delivered, the policy allows for deviation where justification is provided. The justification for the additional hierarchy for BNG delivery is so that the movement of biodiversity away from the LPAs and Central Lancashire, resulting from development in those boundaries, is minimised. Therefore, the policy wording is considered sound.		
A67.9	Rep'r L&Q Org. L&Q Agent Mr Phil Robinson	Policy Site	Policy EN6: Biodiversity Net Gain	L&Q consider that the Council should adhere to the Government's proposals on biodiversity gain set out in the Environment Act. L&Q state that if this policy is going to be included within the CLLP then this is a matter that also needs to be fully considered as part of the site allocation process as it may result in some sites struggling to meet this requirement and not delivering at the density expected, certainly given the age of the density evidence as highlighted previously. Overall, L&Q consider that this element of the policy is not necessary and provides unnecessary duplication with national policy.	It is considered that policy EN6 as written is sound and is in accordance with national policy. Policy EN6 provides additional guidance that is complementary to national policy, that are considered not to be restrictive or have any significant impact on deliverability of development; it is not considered to duplicate national policy; any repetition of national policy provides the necessary context to the policy and confirms the council is not deviating from the national 10% net gain requirement.	No	Yes
D19.2	Rep'r Mr Philip Carter Org. Environment Agency Agent	Policy Site	Policy EN6: Biodiversity Net Gain	The representation proposes a modification to the EN6 policy wording to omit the reference to 'compensation', as it is considered inconsistent with national policy.	The comments are noted, and proposed amendments may improve the clarity of the policy. However, the policy is considered sound as it is written as the use of 'compensation' is considered to be recognised in this context and in	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						terms of BNG as meaning habitat creation and enhancement or BNG provision.		
D26.11	Rep'r	Ms Rachel Whitaker	Policy	Policy EN6: Biodiversity Net Gain	Natural England (NE) recommend the policy wording is amended to reflect cross theme issues of ecological connectivity and climate change resilience, such as 'Development should prevent impacts to the natural environment and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures', in line with the NPPF (paragraph 187d) NE also recommend a safeguarding policy to identify what form of development would be appropriate at the site allocated under EN5.1. NE's comments also refer to NE's Environment Benefits from Nature tool.	The councils welcome the comments from NE on policy EN6. Supplementary text for Policy EN5 addresses the relationship between Green Infrastructure (GI) and ecosystem services, and the role for natural resilience and mitigating the impacts of climate change and provision of ecological network of habitats. It is felt that EN5 addresses the wider environmental gains associated with GI for which habitats created or enhanced under BNG would also be assessed under. It is noted that Natural England's Environmental Benefits from Nature tool can assist to identify opportunities for wider benefits for people and nature from BNG. Comments on the allocation of Harrison's Farm is addressed by supporting information presented in policy EN5, in relation to allotment provision, a Biodiversity Gain Site and cemetery extension.	No	No
	Org.	Natural England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN7: Designated sites for nature conservation				Count of Representations against this policy/section: 4		
A41.3	Rep'r Rowland Homes Limited Org. Rowland Homes Limited Agent Mr Brian O Connor	Policy Policy EN7: Designated sites for nature conservation Site	The representation finds it unclear why 'Wildlife Corridors' have been identified as a locally designated site as they do not fall under the NPPF definition. The CLLP does not provide a definition for Wildlife Corridors, nor do they appear to have been identified on the accompanying policies map. Therefore, it is not understood why Wildlife Corridors have been listed in part 1 of the Policy. The representation also raises concerns on the wording in Part 2 of the policy, specifically how it is not clear how a loss of ecological or conservation value would be measured and evidenced, and how a net gain on designated sites would be achieved and delivered. The representation states it is unclear whether Part 2 is referring to statutory BNG.	Agree that 'Wildlife Corridors' are not a designation and should be removed from the list in the policy. Wildlife Corridors are also to be removed from the table at paragraph 7.42 which lists the hierarchy of designated sites. See proposed modifications MA20-24. Proposed Modifications: Policy EN7 – P.132 Bullet (1) 1. Remove wildlife corridors from the list of designated sites in policy wording •Local Geodiversity Sites (LGS) •Wildlife Corridors Policy EN7 – P.133 Para 7.42 7.42 Wildlife Corridors i.e. remove from table of designated sites in policy wording beneath 7.42 Otherwise, 'wildlife corridors' is considered to be a widely used and recognised term to identify linear areas of greenspace and habitat providing ecological and habitat connectivity, subject to the omission of 'wildlife corridors' from the list, it is considered that the reference to wildlife corridors elsewhere in the policy and the plan is sound. In regard to Part 2 of the policy, the council notes that there could be an improvement to the clarity of the policy/supporting text to remove ambiguity. Text in the policy (point 4)	Yes MA20 MA21 MA22 MA23 MA24	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						refers to the requirement for an Ecological Assessment, which will be required in instances where there are impacts to designated sites, Priority Habitats and/or Irreplaceable Habitats; it is anticipated that impacts will be measured and evidenced via appropriate ecological assessment, and such assessments will demonstrate how an overall net gain will be delivered, this may or may not be via Biodiversity Net Gain and the statutory metric but will be down to professional opinion and other policies and legislation that apply to the development proposals. Therefore, the councils are confident that the plan as drafted is sound.		
A61.14	Rep'r Org. Agent	Mr Rob Haslam Harworth Estates Mr Brian O Connor	Policy Site	Policy EN7: Designated sites for nature conservation	The representation finds it unclear why 'Wildlife Corridors' have been identified as a locally designated site as they do not fall under the NPPF definition. The CLLP does not provide a definition for Wildlife Corridors, nor do they appear to have been identified on the accompanying policies map. Therefore, it is not understood why Wildlife Corridors have been listed in part 1 of the Policy.	Agree that 'Wildlife Corridors' are not a designation and should be removed from the list in the policy. Wildlife Corridors are also to be removed from the table at paragraph 7.42 which lists the hierarchy of designated sites. See proposed modifications MA20-24. Proposed Modifications: Policy EN7 – P.132 Bullet (1) 1. Remove wildlife corridors from the list of designated sites in policy wording •Local Geodiversity Sites (LGS) •Wildlife Corridors Policy EN7 – P.133 Para 7.42 7.42 Wildlife Corridors i.e. remove from table of designated sites in policy wording beneath 7.42	Yes MA20 MA21 MA22 MA23 MA24	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						Otherwise, 'wildlife corridors' is considered to be a widely used and recognised term to identify linear areas of greenspace and habitat providing ecological and habitat connectivity, subject to the omission of 'wildlife corridors' from the list, it is considered that the reference to wildlife corridors elsewhere in the policy and the plan is sound.		
D18.2	Rep'r	Mr David Dunlop	Policy	Policy EN7: Designated sites for nature conservation	LWT considers the environmental policies sound.	This is welcomed.	No	No
	Org.	The Wildlife Trust for Lancashire, Manchester & North Merseyside	Site					
	Agent							
D26.12	Rep'r	Ms Rachel Whitaker	Policy	Policy EN7: Designated sites for nature conservation	Natural England (NE) welcomes Policy EN7. NE expresses the policy considers direct and indirect impacts of development on designated sites such as water quality. NE note that many of the European Sites will require assessment of Functionally Linked Land (FLL) and NE support the provision of guidance regarding FLL and survey requirements. In the representation, NE have advised that the removal of the Liverpool Bay SPA from the table in this section. NE state the plan is to make explicit	NE's comments are welcomed overall. The Habitats Regulations Assessment (HRA) prepared for the plan requires the inclusion of the Liverpool SPA in the local plan owing to potential Likely Significant Effects (LSEs) resulting from development in the local plan area; the inclusion of Liverpool Bay SPA in the policy is considered justified. It is considered that the policy captures Local Geodiversity Sites and their protection, in addition to statutory and non-statutory designated sites for	No	No
	Org.	Natural England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			reference to geological conservation (including local geological sites) and the need to conserve, interpret and manage geological sites and features in the wider environment. NE support the reference to the LNRS in the policy.	nature conservation.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN8: Trees, woodland and hedgerows				Count of Representations against this policy/section:	6			
A24.11	Rep'r	Mrs Joanne Harding	Policy	Policy EN8: Trees, woodland and hedgerows	The HBF is concerned by the potential tree ratio and hedgerow replacement strategy provided, this could have significant potential implications in terms of viability of the development, not only due to the tree and hedge provision costs but also in terms of efficient land use, site layout and highways considerations. The HBF considers that it will be important for the Council to gather appropriate evidence in relation to this policy that considers its practical implementation, and how it sits alongside other plan requirements.	The concerns are noted, and additional clarification on the flexibility of the policy may improve the plan, however, the policy is considered sound, as it is written. The policy does state that 'off-site compensation will only be considered in exceptional cases', allowing for off-site delivery where absolutely necessary; this may include cases where on-site compensation significantly impacts the viability of a development.	No	Yes
	Org.	Home Builders Federation	Site					
	Agent							
A38.3	Rep'r	Taylor Wimpey UK Limited	Policy	Policy EN8: Trees, woodland and hedgerows	The representation has concerns on the proposed provision ratio, which would require a developer to provide 2 trees per 1 loss and loss of hedgerow, places a constraint upon the developer from a viability and deliverability perspective. The requirement to deliver 2 trees per 1 lost would have a serious implication upon the efficiency of land use on a site, site layout and highways considerations. The representation suggests that Part 6 of draft Policy EN8 should therefore be removed.	The concerns are noted, and additional clarification on the flexibility of the policy may improve the plan, however, the policy is considered sound, as it is written. The policy does state that 'off-site compensation will only be considered in exceptional cases', allowing for off-site delivery where absolutely necessary; this may include cases where on-site compensation significantly impacts the viability of a development.	No	Yes
	Org.	Taylor Wimpey UK Limited	Site					
	Agent	Ms Alexandra Gavi						
A39.10	Rep'r	Castle Green Homes	Policy	Policy EN8: Trees, woodland and hedgerows	The representation considers that the policy asking for a direct replacement strategy for trees is not required. The representation considers that any necessary tree loss needs would be	The concerns on the tree and hedgerow policy are recognised. It is considered that not all development will be captured by mandatory BNG (such as those exempt or unapplicable),	No	Yes
	Org.	Castle Green Homes	Site					

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent	Mrs Kerry Walker			addressed within any BNG assessment required by Policy EN6, also states that the loss of trees and hedgerow, certainly poor quality trees and hedgerow, may be more than adequately off set by other forms of landscaping. Overall, they consider that this policy is not justified, positively prepared and may not be consistent with national policy.	therefore this policy is not considered to duplicate national BNG policy or requirements in Policy EN6. The councils consider that the net loss of trees and/or hedgerow is not acceptable and does not align with climate, amenity and nature recovery objectives, therefore the requirement for compensatory planting is applied in the policy, and is considered justified. Clarification on the flexibility of the policy may improve the plan, however, the policy is considered sound, as it is written. The policy does state that 'off-site compensation will only be considered in exceptional cases', allowing for off-site delivery where absolutely necessary; this may include cases where on-site compensation significantly impacts the viability of a development.		
A45.10	Rep'r	Taylor Wimpey UK Limited	Policy	Policy EN8: Trees, woodland and hedgerows	The representation has concerns over the potential tree ratio and hedgerow replacement strategy provided, which could have significant potential implications in terms of viability of the development, not only due to the tree and hedge provision costs but also in terms of efficient land use, site layout and highways considerations.	The concerns are noted, and additional clarification on the flexibility of the policy may improve the plan, however, the policy is considered sound, as it is written. The policy does state that 'off-site compensation will only be considered in exceptional cases', allowing for off-site delivery where absolutely necessary; this may include cases where on-site compensation significantly impacts the viability of a development.	No	Yes
	Org.	Taylor Wimpey UK Limited	Site					
	Agent	Megan Wilson						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A63.3	Rep'r	PWA Planning	Policy	Policy EN8: Trees, woodland and hedgerows	The representation has concerns on the proposed tree and hedgerow compensation requirements, which would require a developer to provide 2 trees per 1 loss and loss of hedgerow on-site. This places a constraint upon the developer from a viability and deliverability perspective.	The concerns are noted, and additional clarification on the flexibility of the policy may improve the plan, however, the policy is considered sound, as it is written. The policy does state that 'off-site compensation will only be considered in exceptional cases', allowing for off-site delivery where absolutely necessary; this may include cases where on-site compensation significantly impacts the viability of a development.	No	Yes
	Org.	PWA Planning	Site					
	Agent	Mr Paul Walton						
A67.10	Rep'r	L&Q	Policy	Policy EN8: Trees, woodland and hedgerows	The representation considers that the policy asking for a direct replacement strategy for trees is not required. The representation considers that any necessary tree loss needs would be addressed within any BNG assessment required by Policy EN6, also states that the loss of trees and hedgerow, certainly poor quality trees and hedgerow, may be more than adequately off set by other forms of landscaping. Overall, they consider that this policy is not justified, positively prepared and may not be consistent with national policy.	The concerns on the tree and hedgerow policy are recognised. It is considered that not all development will be captured by mandatory BNG (such as those exempt or unapplicable), therefore this policy is not considered to duplicate requirements in Policy EN6. The council(s) consider that the net loss of trees and/or hedgerow is not acceptable and does not align with climate, amenity and nature recovery objectives, therefore the requirement for compensatory planting is applied in the policy, and is considered justified. The concerns are noted, and additional clarification on the flexibility of the policy may improve the plan, however, the policy is considered sound, as it is written. The policy does state that 'off-site compensation will only be considered in exceptional cases', allowing for off-site delivery where absolutely necessary; this may include cases where on-site compensation	No	Yes
	Org.	L&Q	Site					
	Agent	Mr Phil Robinson						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				significantly impacts the viability of a development.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN9: Species Protection						Count of Representations against this policy/section:		1
D19.3	Rep'r	Mr Philip Carter	Policy	Policy EN9: Species Protection	The representation points out the error in paragraph 7.63 that refers to Natural England as a statutory consultee for planning applications affecting protected species.	The following modification is proposed (MA25): 7.63 Natural England is the statutory consultee on all the planning applications affecting protected species, and The Councils have a duty to inform applicants of their legal obligations such as the requirement to obtain relevant species licences where appropriate.	Yes MA25	No
	Org.	Environment Agency	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN10: Development and Flood Risk				Count of Representations against this policy/section:	7			
A41.4	Rep'r	Rowland Homes Limited	Policy	Policy EN10: Development and Flood Risk	Part 1 of Policy is not consistent with PPG. Wording should be amended or deleted to be compliant with PPG and avoid misinterpretation.	Request for amendment and clarification of Part 1 of Policy wording is noted. The Council's has worked proactively with flood risk authorities in the development of policies. The councils recognise that wording changes proposed may help improve the clarity of the policy. The councils will continue to work with statutory bodies (EA, LLFA and UU) through the examination process and through any SoCG prepared.	No	Yes
	Org.	Rowland Homes Limited	Site					
	Agent	Mr Brian O Connor						
A60.13	Rep'r	Ms Ashleigh Genco	Policy	Policy EN10: Development and Flood Risk	Published L2 SFRA are reliant upon outdated mapping data, there has likely been an increase in number of sites at medium/high flood risk due to mapping data released in March 2025. Therefore, additional wording suggested to append Part 7 of the policy as to take account and acknowledge limitations of published L2 SFRAs.	7. "…In addition, site-specific surface water modelling information will be considered as part of future planning applications for development." Additional wording not accepted. Please refer to the Statement of Common Ground with the Environment Agency February 2025. The EA have confirmed additional work will only be required for sites which have undergone a Level 2 SFRA and where the new mapping indicates a change to the extent of flood risk on that site.	No	Yes
	Org.	Story Homes	Site					
	Agent	Mr Dan Mitchell						
A61.15	Rep'r	Mr Rob Haslam	Policy	Policy EN10: Development and Flood Risk	Part 1 of Policy is not consistent with PPG and is not effective. Wording of Part 1 should be amended to be compliant with PPG and avoid misinterpretation.	Request for amendment and clarification of Part 1 of Policy wording is noted. No suggested wording has been	No	Yes
	Org.	Harworth Estates	Site					

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent	Mr Brian O Connor			Technical matters related to flood risk and drainage should be deferred to the planning application stage.	provided in the representation. The Councils have worked proactively with flood risk authorities in the development of this policy. The councils recognise that wording changes proposed may help improve the clarity of the policy. The councils will continue to work with the statutory bodies (EA, LLFA and UU) through the examination process and through any SoCG prepared.		
D12.2	Rep'r	Richard Sharples	Policy	Policy EN10: Development and Flood Risk	Suggests wording amendments to paragraph 2 of the policy to provide greater clarity and precision in-line with wording of paragraph 181 of the NPPF.	The comments in respect of specific matters are addressed through subsequent representations made by LCC.	No	No
	Org.	Lancashire County Council	Site					
	Agent							
D15.18	Rep'r	Andrew Leyssens	Policy	Policy EN10: Development and Flood Risk	UU request additional text to be included within the policy wording and supporting text regarding sewer flood risk (SFR). UU request where sites affected by SFR are identified, additional site-specific policy wording / key development considerations. Where flood risk is modelled, request additional wording. Where there is record of flooding on-site, or vicinity of site, request additional wording. In relation to the flood risks we have identified, UU wish to liaise with the Council's to ensure that these flood risks are fully reflected in the SFRAs.	The councils recognise that wording changes proposed may help improve the clarity of the policy. The councils will continue to work with statutory bodies (EA, LLFA and UU) through the examination process and through any SoCG prepared.	No	No
	Org.	United Utilties	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D19.1	Rep'r	Mr Philip Carter	Policy	Policy EN10: Development and Flood Risk	Elements of Policy wording and supporting text inconsistent with national policy. Part 2 refers to protection of agricultural land. Policy wording would potentially prevent delivery of off-site natural flood management or flood stores for neighbouring development which in contrary to National Flood Risk Management Policy (NFRMP). The policy wording is inconsistent with NFRMP where policy identifies FRA should consider flood risk issues and resilience. Part 4 wording fails to identify essential infrastructure and is inconsistent with PPG. Paragrapgh 7.67 is inconsistent with paras 068 and 069 of the PPG in which it seeks to summarise. EA request Parts 2 and 4 of the policy be amended to be consistent with national guidance. Para 7.66 should be re-worded & 7.67 of the supporting text should include reference to and a summary of flood resilience considerations in addition to flood resistance. EA proposed modification Request 2. Development will be required to demonstrate that it is it is safe from all types of flooding and that it will not exacerbate flood risk onsite or elsewhere within the plan area, including neighbouring agricultural land unacceptably increase flood risk on or off-site. Where appropriate, applications should be supported by a site-specific flood risk assessment and flood risk issues are clearly considered, and flood	The councils recognise that wording changes proposed may help improve the clarity of the policy. The councils will continue to work with statutory bodies (EA, LLFA and UU) through the examination process and through any SoCG prepared.	No	No
	Org.	Environment Agency	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			resilience is addressed, accounting for climate change that identifies the risk of flooding to the site and what mitigation is required to ensure development will be safe for its lifetime and will not increase flood risk elsewhere, taking account of climate change. 4. In Flood Zone 3b (the functional floodplain) only proposals for 'Water Compatible' development and 'Essential Infrastructure' (that satisfies the Exception Test) will be considered appropriate – designed and constructed to remain operational and safe for users in times of flood, and not impede water flows or result in significant loss of floodplain storage" Para 7.66 Due to areas at highest risk of flooding across Central Lancashire, the plan seeks to direct development away from these areas The plan seeks to direct development away from those areas at the highest risk of flooding across Central Lancashire			
D26.13	Rep'r: Ms Rachel Whitaker Org.: Natural England Agent:	Policy: Policy EN10: Development and Flood Risk Site:	NE highlight that EN10 should also include reference to the opportunities presented by nature-based solutions. NE advise that sustainable drainage systems can perform a range of functions including improved flood risk management, provision of accessible green/blue space, climate change adaptation and biodiversity enhancement. NE signpost Sustainable Drain Systems – Maximising the Potential for People and Wildlife produced by the	Representation noted. BNG requirements are covered within Policy EN6 . Policy EN11 refers to the wider benefits of SuDS. Modifications not considered necessary.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Royal Society for the Protection of Birds (RSPB) and Wildfowl and Wetlands Trust (WWT).			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN11: Water resource management						Count of Representations against this policy/section:		2
D12.3	Rep'r	Richard Sharples	Policy	Policy EN11: Water resource management	The LLFA request wording amendments to be made to Part 3 of the Policy and wording to be moved to supporting text as follows: 3. 'On previously developed land, the peak surface water run-off rates and run-off volumes should not exceed the corresponding greenfield runoff rates and volumes for the same rainfall event inclusive of an allowance for climate change and urban creep. Where this cannot be achieved (with a robust justification), and/or only where an operational drainage system exists, a minimum betterment will need establishing of 30% reduction of the existing peak surface water run-off rates for the site must be achieved, and agreeing with the drainage approving body. unless otherwise agreed in writing by the drainage approving body. ' Incorporate 'A betterment of at least 30% reduction of the existing peak runoff rates is considered to be the minimum requirement in line with section 3.3.2 of The CIRIA SuDS Manual (C753).' into the supporting justification text.	The councils recognise that wording changes proposed may help improve the clarity of the policy. The councils will continue to work with statutory bodies (EA, LLFA and UU) through the examination process and through any SoCG prepared.	No	No
	Org.	Lancashire County Council	Site					
	Agent							
D15.19	Rep'r	Andrew Leyssens	Policy	Policy EN11: Water resource management	UU request additional text to be included within the policy wording and supporting text regarding sewer flood risk (SFR). UU request where sites affected by SFR are identified, additional site-specific policy wording / key development	The councils recognise that wording changes proposed may help improve the clarity of the policy. The councils will continue to work with statutory bodies (EA, LLFA and UU) through the examination process and through any	No	No
	Org.	United Utilties	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			considerations. Where flood risk is modelled, request additional wording. Where there is record of flooding on-site, or vicinity of site, request additional wording. In relation to the flood risks we have identified, UU wish to liaise with the Council's to ensure that these flood risks are fully reflected in the SFRAs.	SoCG prepared.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN12: Protecting Groundwater source protection zones				Count of Representations against this policy/section:		1
D15.20	Rep'r: Andrew Leyssens Org.: United Utilties Agent:	Policy: Policy EN12: Protecting Groundwater source protection zones Site:	The prevention of pollution to drinking water supplies is critical. New development sites are more appropriately located away from locations which are identified as sensitive groundwater protection areas especially within and adjacent to SPZ1 which is closest to the water abstraction point and the most sensitive. UU request wording amendments to be made and additional explanatory text be included. For sites located in a SPZ or on water catchment land, UU request that the key development considerations / site-specific policy identify the constraint and the need for development to be appropriately mitigated / managed.	The councils recognise that wording changes proposed may help improve the clarity of the policy. The councils will continue to work with statutory bodies (EA, LLFA and UU) through the examination process and through any SoCG prepared.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN13: Heritage assets and archaeology				Count of Representations against this policy/section:	3			
A06.08	Rep'r	Maple Grove Developments	Policy	Policy EN13: Heritage assets and archaeology	Policy wording does not address proposals that would have "less than substantial harm" on a heritage asset and therefore is not consistent with NPPF paragraph 215. Considered that where proposal will lead to less than substantial harm to the significance of a heritage asset, the harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use. Recommend EN13 wording should expanded to be made consistent with NPPF paragraph 215.	The CLLP should be read in conjunction with, and should not duplicate, national policy (NPPF). Therefore, the Council do not consider it necessary to amend the policy to repeat NPPF paragraph 215.	No	Yes
	Org.	Maple Grove Developments	Site					
	Agent	Mr Paul Newton						
D02.36	Rep'r	Emily Hrycan	Policy	Policy EN13: Heritage assets and archaeology	Objects to policy EN13 on the following grounds: - Policy and plan contains no strategy for the historic environment in the Central Lancashire area, nor any locally specific policies that demonstrate area priorities - Local Plans should include strategic policies to conserve and enhance the historic environment of the area - Modifications should be inserted to provide locally specific strategy and development management policies - The plan as drafted contains gaps affecting archaeology, conservation areas and levels of harm - Alternative wording suggested; without it, it is considered that the plan is unsound as it does not accord with the requirements of the NPPF	The Councils recognise that wording changes as proposed could improve the clarity of the policy but consider the policy as drafted is sound. It is not necessary to repeat national policy within the NPPF.	No	No
	Org.	Historic England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D11.4	Rep'r	Rebecca Housam	Policy	Policy EN13: Heritage assets and archaeology	As currently drafted, EN13 gives support for the repair and / or re-use of designated heritage assets on the 'At Risk Register'. This would exclude all listed buildings within the strategic site allocation [Fulwood Barracks] owing to them currently being well maintained by the MoD.	Refer to response to D2.36.	No	Yes
	Org.	Defence Infrastructure Organisation	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN14: Environmental quality				Count of Representations against this policy/section:	5			
A60.14	Rep'r	Ms Ashleigh Genco	Policy	Policy EN14: Environmental quality	Policy EN14 should be amended for clarity. As currently worded, criterion 2e states that development shall not: "result in significant harm to soil quality." Notwithstanding questions that we have in respect of the Authorities' definition of "significant harm", and what this means in a practical sense, we are unclear as to what the implications of such a policy are for greenfield residential development. We do not consider that this policy is adequately justified.	The test for 'Significant harm' will be a professional judgement, depending upon the nature of the development and location. Criterion e) regarding soil quality is most likely to apply to the expected operation of non-residential development, but may be relevant if the council considers that a Construction Environmental Management Plan is necessary to reduce pollution during the construction phase in a sensitive area.	No	Yes
	Org.	Story Homes	Site					
	Agent	Mr Dan Mitchell						
D16.24	Rep'r	Mrs Lindsay Alder	Policy	Policy EN14: Environmental quality	National Highways is supportive of this Policy with regards to environmental concerns surrounding degradation of soil and air quality. This approach is supported by Paragraph 55 of the Circular 01/2022.	Noted.	No	Yes
	Org.	National Highways	Site					
	Agent							
D19.4	Rep'r	Mr Philip Carter	Policy	Policy EN14: Environmental quality	EN14 is not sound as it is not consistent with national policy. Policy EN14 considers environmental quality, however there is no consideration of water quality. NPPF policy 187, part e) confirms that planning policies should contribute to avoiding unacceptable risks of pollution from new development, and this is not reflected in Policy EN14. EN14 amended with the following additions: 2. f) result in significant harm to water	The councils recognise that wording changes proposed may help improve the clarity of the policy and/or supporting text. The councils will continue to work with the EA through the examination process and through any SoCG prepared	No	No
	Org.	Environment Agency	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					quality 4. Applications for development that propose the use of non-mains drainage systems shall be supported by sufficient evidence to demonstrate why a connection to the public sewerage network is not possible.			
D22	Rep'r	Mr Bradley Shelton	Policy	Policy EN14: Environmental quality	EN14 is not legally compliant or sound as it makes no mention of unstable land. This is currently covered by BNE7 in the Chorley Local Plan and G14 in the South Ribble Local Plan as recorded coal mining features appear to be concentrated in the south eastern side of the Central Lancashire area. Any new development in areas where our records indicate that past coal mining activity has taken place is potentially at risk from surface instability. Any new development in the Development High Risk Area (DHRA) should be supported by a Coal Mining Risk Assessment. EN14 re-written as follows: 1. Development proposals will be expected to deliver a high-quality environment, and pollution shall be minimised and mitigated in both development's construction and continued operation. 2. Development shall not: a) cause deterioration of air quality or introduce uses sensitive to air pollution into areas of existing poor air quality; b) build on contaminated or unstable land, without satisfactory assessment	The Councils recognise that the wording changes proposed may help improve the clarity of the policy and supporting text. The councils will continue to work with Mining Remediation on the matter, however it is considered that policies contained within the National Planning Policy Framework (NPPF) 2024 do adequately address the issue of unstable land on development. Specifically, paragraphs 125(c) and 187(e), as below: p.125(c) – "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;" p.187(e) – "preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability, Development should, wherever possible,	No	Yes
	Org.	Mining Remediation Authority	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			and remediation; c) subject occupiers/users to inappropriate noise and vibration, or introduce uses sensitive to noise and vibration into excessively noisy environments; d) emit excessive levels of artificial light, odour and / or dust; and e) result in significant harm to soil quality. 3. A Construction Environmental Management Plan is required alongside any planning application for development on a strategic site or on a housing, employment or mixed use allocation. It is also required for some developments on non-allocated sites to ensure that they will not have a detrimental impact on the environment through the creation of noise, vibration, dust or lighting disturbance This would ensure that for those parts of Central Lancashire area where land instability is a potential risk developers will be aware that the issue need to be addressed, preventing any undue delay in the decision making process. As well as the additional supporting text as below: Contaminated and unstable land 7.90 Contaminated land is land that has been polluted with harmful substances to the point where it now poses a serious risk to health and the environment. The Councils hold records 146 of known contaminated sites. Consequently, developers are encouraged to engage at an early stage to identify if their land is likely to be	help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and” As the Statement of Community Involvement lists the Mining Remediation Authority as a statutory consultee for Planning Applications, the body will be consulted as such and be able to make representations on specific proposals where appropriate.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			contaminated. Where land contamination is suspected, a Contaminated Land Risk Assessment should be provided, consistent with national guidance. Where remediation is necessary, this will be secured through condition. Where land falls within areas of past coal mining activity, as defined by the Coal Authority Development High Risk Area, relevant development proposals should be supported by a Coal Mining Risk Assessment. This should assess the risks posed and make recommendations for any further works necessary, including investigatory and remedial works.			
D26.14	Rep'r: Ms Rachel Whitaker Org.: Natural England Agent:	Policy: Policy EN14: Environmental quality Site:	Natural England applies a distance criterion of 10 km for designated sites which may be affected by changes in air quality. Document/sources to refer to: APIS, Nitrogen Decision Framework, Air Quality, PPG and Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Construction Environmental Management Plans (CEMPs) should be required to control construction sites near to sensitive areas of habitat.	It is unnecessary for guidance documents regarding air quality to be cited within the plan. These quickly become outdated. CEMPs are required for sites near to sensitive areas of habitat within policy EN14, criteria 3. Furthermore, Construction Management Plans are cited within Policy ST2, criteria 8 which the councils can require to help mitigate the impact of construction sites. The policy is not prescriptive regarding the circumstances in which these are sought, but this could include where the construction phase must be sensitive to habitat.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN15: Areas of Green Belt						Count of Representations against this policy/section:		10
A02.03	Rep'r	Mr. Roger Bracewell	Policy	Policy EN15: Areas of Green Belt	Support Criterion 4, regarding the approach to major industrial/employment sites in the Green Belt.	The support is welcomed.	No	Yes
	Org.	GA Pet Food Partners	Site					
	Agent	Mr. Matthew Good						
A05.1	Rep'r	Mr. Jonathan Stoker	Policy	Policy EN15: Areas of Green Belt	Criterion c) confirming local interpretation (<30% of the original building) of term 'disproportionate addition' stated within NPPF para 154c is too restrictive and unjustified. Stokers seeks removal of the site from the Green Belt and its inclusions within the settlement boundary of Whittle-le Woods	NPPF para 16c) necessitates that plans should contain policies that are clearly written and unambiguous. To ensure national Green Belt policy can be applied consistently with regards to extensions, criterion c) defines 'disproportionate addition' to be an uplift of 30% in volume (from the volume of the original building). 30% is considered appropriate as this balances the competing need for growth, whilst also ensuring that the extension remains subservient to the host building and results in limited harm to the Green Belt. The Stokers site is located in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment growth. As the Councils can meet their need for employment within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for	No	Yes
	Org.	Stokers Ltd	Site					
	Agent	Ms. Amy Longmore						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						Green Belt release cannot be demonstrated.		
A24.12	Rep'r	Mrs Joanne Harding	Policy	Policy EN15: Areas of Green Belt	The policy should be deleted as it is superseded by NPPF (Dec 2024).	The policy adds local detail/interpretation to national Green Belt policy to assist with the application of NPPF para 154. Modifications have been proposed to bring the policy up to date with NPPF (Dec 2024). See response to representation A49.	No	Yes
	Org.	Home Builders Federation	Site					
	Agent							
A26.8	Rep'r	Miss Georgina Cox	Policy	Policy EN15: Areas of Green Belt	The policy should be deleted as it is superseded by NPPF (Dec 2024).	The policy adds local detail/interpretation to national Green Belt policy to assist with the application of NPPF para 154. Modifications have been proposed to bring the policy up to date with NPPF (Dec 2024). See response to representation A49.	No	Yes
	Org.	Gladman Developments	Site					
	Agent							
A31.18	Rep'r	Mrs Emily Armstrong	Policy	Policy EN15: Areas of Green Belt	The policy should be updated to reflect NPPF (2024) and include the additional text at criterion 4.	Modifications have been proposed to bring the policy up to date with NPPF (Dec 2024). See response to representation A49. The representor also proposes the following text: Other forms of development 4.[illegible]Where a site or location exhibits a particular quality and suitability for a form of development for which there is an identified need, including by reference to how it can be accessed, profile of the site and its suitability for development, this should be given weight in any assessment of whether the proposal can be supported by reference to National Planning Policy Framework green belt policy.'	No	Yes
	Org.	F1 Real Estate Management	Site					
	Agent	Mr John Francis						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						The proposed text cannot be read in conjunction with national policy regarding Green Belt and consequently is inconsistent with NPPF para 16 d), necessitating that policies should be clear and unambiguous.		
A45.11	Rep'r Org. Agent	Taylor Wimpey UK Limited Taylor Wimpey UK Limited Megan Wilson	Policy Site	Policy EN15: Areas of Green Belt	The policy should be deleted as it is superseded by NPPF (Dec 2024).	The policy adds local detail/interpretation to national Green Belt policy to assist with the application of NPPF para 154. Modifications have been proposed to bring the policy up to date with NPPF (Dec 2024). See response to representation A49.	No	Yes
A49	Rep'r Org. Agent	Mr Steve Glenn Northern Trust Mr Chris Betteridge	Policy Site	Policy EN15: Areas of Green Belt	The policy should be updated to reflect NPPF (2024). The definition of 'facilities' referred to within NPPF para 154 b), should not be restricted to 'buildings'. Criterion c) + d) confirming local interpretation (<30% of the original building) of term 'disproportionate addition' and 'materially larger' stated within NPPF para 154 c) + d) is too restrictive and unjustified. Criterion e) confirming local interpretation of terms 'limited' and 'infilling' stated within NPPF para 154e has not been justified. The term 'limited' is also unclear as it is also cited within criteria f). The term 'village' should include the	The word 'buildings' is included within criterion b) to clarify the type of structures referred to within NPPF para 154b that would necessitate a Green Belt Assessment. NPPF para 16c) necessitates that plans should contain policies that are clearly written and unambiguous. To ensure national Green Belt policy can be applied consistently, criteria c) + d) defines an uplift of 30% in volume (from the 1 July 1948). 30% is considered appropriate as this balances the competing need for growth, whilst limiting the impact of development on the Green Belt. 4x dwellings is cited as the maxima within Criteria e) as this is consistent with the interpretation of the term	Yes MA26 MA27 MA28 MA29 MA30 MA31 MA32	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			settlements within Tier 3 of the Settlement Hierarchy (Table 1). Hamlets that are not included within the settlement hierarchy.	'limited infilling' by Inspectors at recent appeal decisions within South Ribble. Whilst the term 'Limited' is repeated within NPPF para 154 e), f) and g), it is reasonable to assume that when cited in separate paragraphs, the definition of 'Limited' can be unique to that paragraph. The Settlement Hierarchy (Table 1) has informed the councils site selection, resulting in numerous sites within Tier 3 being proposed for allocation. Introducing Tier 3 settlements into the definition of 'village' within the scope of NPPF para 154 e) risks putting unsustainable development pressure onto their periphery. Settlements not cited within the settlement hierarchy are considered to be hamlets and rather than villages, representing unsustainable locations for development. For consistency with NPPF (2024), the below factual modifications are proposed (MA26-32). 2(h) Other forms of development The development typologies listed within NPPF (2023) 2024 para 155 154 h)i to vi necessitates assessment against both the purposes of the Green Belt and 'Openness'. A Green Belt Assessment should be provided showing how the national policy tests have been met.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						For buildings pursuant to NPPF para 155 d) 154 h) iv, a structural survey is likely to be required to demonstrate the building is of permanent and substantial construction. Para 7.99 NPPF (2023) para 155 d) (2024) 154 h) iv sets… Para 7.101 - Exceptions c), d) within NPPF (2023) (2024) para 154 should…. Para 7.105 - For development not otherwise meeting the exceptions set out within NPPF (2023) (2024) paras 154 and 155, the Green Belt is harmed. Para 7.106 - At these industrial/employment sites, for proposals to develop within the site's curtilage that do not meet the NPPF (2023) (2024) paras 154 and 155 exceptions…		
A60.15	Rep'r Org. Agent	Ms Ashleigh Genco Story Homes Mr Dan Mitchell	Policy Site	Policy EN15: Areas of Green Belt	The policy should be updated to reflect NPPF 2024. No sites of Safeguarded Land are identified.	Modifications have been proposed to bring the policy up to date with NPPF (Dec 2024). The purpose of the policy is to assist with the implementation of NPPF para 154. See response to representation A49. Safeguarded Land falls outside the scope of the policy.	No	Yes
A63.4	Rep'r Org. Agent	PWA Planning PWA Planning Mr Paul Walton	Policy Site	Policy EN15: Areas of Green Belt	The policy should be updated to reflect NPPF 2024. Criterion e) confirming local interpretation of terms 'limited' and 'infilling' stated within NPPF para 154e is	Modifications have been proposed to bring the policy up to date with NPPF (Dec 2024). See response to representation A49. The representor sets out very similar	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					too restrictive. Criterion c) + d) confirming local interpretation (<30% of the original building) of term 'disproportionate addition' and 'materially larger' stated within NPPF para 154c is too restrictive and unjustified. A Green Belt Assessment should not be required for NPPF (2024) Paragraph 154(g)	arguments regarding criteria c), d) and e) as representation reference A49. See representation A49 for the council's response. The test set out within para 154 g) is 'not cause substantial harm' [re: Openness]. A Green Belt Assessment is an appropriate tool to assist with making this judgement.		
D26.15	Rep'r Org. Agent	Ms Rachel Whitaker Natural England	Policy Site	Policy EN15: Areas of Green Belt	Policies should positively enhance land within the Green Belt, particularly in 'urban fringe' landscapes. Natural England guidance should be referred to in criteria g).	The purpose of the policy is exclusively to add local detail to NPPF para 154. The Representor's comments fall outside this scope.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN16: Protection of agricultural land				Count of Representations against this policy/section: 2		
A63.5	Rep'r PWA Planning Org. PWA Planning Agent Mr Paul Walton	Policy Policy EN16: Protection of agricultural land Site	Policy places stringent requirements on all developments over 0.5ha despite there not being a specific site threshold in NPPF. Suggest Agricultural Land Classification Report to a more proportionate level (e.g. 2ha or more).	The need to balance the protection of Agricultural Land with the need for development is recognised, however, a threshold of 0.5ha does allow for some small-scale development to take place without the need for an Agricultural Land Classification Report. Increasing the threshold could allow the loss of fairly large areas of this land without proper investigation and studies being done. Once best and most versatile agricultural land is used for built development, it is difficult to mitigate against. The current threshold allows for smaller scale development whilst also ensuring these areas are protected. It is therefore not proposed to modify the policy.	No	Yes
D26.16	Rep'r Ms Rachel Whitaker Org. Natural England Agent	Policy Policy EN16: Protection of agricultural land Site	Support the policy and its aims to protect Best and Most Versatile Agricultural Land. Plan should recognise that development has an irreversible adverse impact on BMV land. Any development on proposed BMV land should be informed by a soil survey. Plan should also have a policy for the wider protection of, and sustainable management of soils on development sites. This should set out mitigation measures to minimise soil disturbance and retain ecosystems.	Support noted. The policy requires an Agricultural Land Classification Report to be carried out for any development proposals that would result in the loss of 0.5ha or above of BMV. Requiring sites of less than 0.5ha to carry out this work would be overly onerous. It would require very small-scale development such as new farm buildings or extensions to existing buildings or properties with areas of BMV to produce a report for small scale development, which would not be reasonable.	No	No

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			The consideration of deep peat should be included within policy wording.	A separate policy on the management of soils is not considered necessary. The Plan requires, in Policy EN14, the production of construction management plans where needed, and these would include soil management plans where appropriate (paragraph 7.97). Policy EN14 also requires that development shall not result in significant harm to soil quality. Soil Management Plans would have to be produced in accordance with all relevant national guidance, such as Natural England Guidance. Areas where deep peat can be found in the Central Lancashire area are covered with protective designations such as EN15 – Areas of Green Belt and EN7 – Development in Open Countryside, which significantly limit the development opportunities in these areas. Should an application be received on an area of peatland, councils will rely on the Local Plan policies, as well as any national guidance and policies on peat.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN17: Development in the open countryside						Count of Representations against this policy/section:		8
A26.9	Rep'r	Miss Georgina Cox	Policy	Policy EN17: Development in the open countryside	EN17 as currently drafted only refers to new residential development in the open countryside in the form of replacement dwellings. The representor would encourage EN17 to be more flexible and permissive in nature to allow sustainable residential development to come forward outside of defined settlement boundaries on greenfield sites. The Plan has a large reliance on windfall development. Revising the policy to allow sustainable windfall development to come forward would help meet the housing requirement. Requests infilling exemption be included within list of acceptable development within open countryside.	The council do not accept the addition proposed. No changes are required to this policy. The Councils are confident that sufficient land is allocated for housing.	No	Yes
	Org.	Gladman Developments	Site					
	Agent							
A32.8	Rep'r	Mr Stephen Glenn	Policy	Policy EN17: Development in the open countryside	Considers policy wording in part to be restrictive. Requests list of acceptable development as set out within the policy be amended to match that of Green Belt.	The council do not accept the addition proposed. No changes are required to this policy.	No	Yes
	Org.	Northern Trust Land Ltd	Site					
	Agent	Mr Alexis De Pol						
A44.4	Rep'r	Mr Jack Pikington	Policy	Policy EN17: Development in the open countryside	Considers policy approach to be too restrictive and is a blanket policy limiting most types of development outside of defined settlement boundaries. Considered wording in part to be more restrictive than nationally described Green Belt policy.	Representation acknowledged. No changes are required to this policy.	No	Yes
	Org.	Seddon Homes	Site					
	Agent	Mr Josh Hellawell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A52.5	Rep'r	Mr Gerald Gornall	Policy	Policy EN17: Development in the open countryside	Considers policy approach to be restrictive. Considered wording in part to be more restrictive than nationally described Green Belt policy	Representation acknowledged. No changes are required to this policy.	No	Yes
	Org.	Private Individual	Site					
	Agent	Mr Daniel Hughes						
A60.16	Rep'r	Ms Ashleigh Genco	Policy	Policy EN17: Development in the open countryside	Considered policy position to have implications to the Council's housing supply. Requests policy wording be amended as to acknowledge policy position will not apply where relevant LPA is unable to demonstrate a five-year housing land supply or where Housing Delivery Test score is less than 75 percent.	Suggested policy amendment is noted as follows: "In accordance with national planning policy, this policy will not apply in respect of housing development, when the relevant LPAs housing supply falls below five years, or its the Housing Delivery Test score is less than 75 per cent." Suggested policy wording is not supported. Please see response to comments made against Policy HS1 regarding Housing requirements.	No	Yes
	Org.	Story Homes	Site					
	Agent	Mr Dan Mitchell						
A63.16	Rep'r	PWA Planning	Policy	Policy EN17: Development in the open countryside	Considers policy approach to be too restrictive and is a blanket policy limiting most types of development outside of defined settlement boundaries. Considered wording in part to be more restrictive than nationally described Green Belt policy.	Representation noted. No changes are required to this policy.	No	Yes
	Org.	PWA Planning	Site					
	Agent	Mr Paul Walton						
D02.37	Rep'r	Emily Hrycan	Policy	Policy EN17: Development in the open countryside	Any new development in the open countryside should not harm a heritage asset. Request additional policy wording as to consistent with NPPF and PPG, ether by referencing policy within text or new wording.	Noted. Suggested policy wording is covered in Policy EN13.	No	No
	Org.	Historic England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D20.7	Rep'r	Mrs Julie Buttle	Policy	Policy EN17: Development in the open countryside	Whittingham Parish Council strongly supports that the policy no longer includes infill sites. Considers infill wording can be exploited to provide unnecessary dwellings in the open countryside.	Support noted and welcomed.	No	Yes
	Org.	Whittingham Parish Council	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN18: Areas of separation						Count of Representations against this policy/section:		11
A26.10	Rep'r	Miss Georgina Cox	Policy	Policy EN18: Areas of separation	Does not consider Policy EN18 to be consistent with national policy or justified and suggests AoS areas are to become de-facto Green Belt. Consideration of the character of settlements should be specific and targeted rather than a blanket approach. AoS should be reduced as to exclude sites with extant planning permission. The representor submits an Area of Separation report by Randall Thorpe focusing on omission sites in Broughton and Goosnargh.	The Council's evidence base (LUC Open Land Designation Study: Landscape Assessment) details the methodological approach to the assessment of Preston's AoS and provides justification of the Council's approach. The omission sites (SHELAA Site Ref 19P007 & 19P008) are assessed as being located within areas of 'moderate' gap strength between Broughton and Barton (19P007) and Grimsargh and Goosnargh (19P008) respectively. The Council's supports a brownfield first approach and promotes development in the most accessible and sustainable locations. The guiding principle of EN18 is to protect areas where there is a risk of coalescence as set out within Criteria 1 of Policy EN18. Further, Criteria 2 of the Policy permits development within the AoS where proposals meet the outlined assessment requirements.	No	Yes
	Org.	Gladman Developments	Site					
	Agent							
A44.5	Rep'r	Mr Jack Pikington	Policy	Policy EN18: Areas of separation	Area of Separation designation between Bilsborrow and Barton is not considered to be necessary. The plan should accommodate the expansion of Barton to the North or South as a linear, the AoS allocation would prevent this. The designation could restrict the growth ambitions of Wyre Borough Council's local plan review along the A6 corridor. The omission site could be designed to be sensitive to the gap, therefore AoS designation should be removed.	The Council's evidence base (LUC Open Land Designation Study: Landscape Assessment) details the methodological approach to the assessment of Preston's AoS and provides justification of the Council's approach. The omission site (SHELAA Site Ref 19P053) is assessed as being sited within a 'moderate' gap strength. The guiding principle of EN18 is to protect areas where there is a risk of coalescence as set out within Criteria 1 of Policy EN18 with, Criteria 2 of the Policy permits development within the	No	Yes
	Org.	Seddon Homes	Site					
	Agent	Mr Josh Hellawell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						AoS, where proposals meet the outlined assessment requirements. Further, the AOS to the north of Barton forms part of the Barton Neighbourhood Development Plan (BNDP), Made December 2023.		
A50.5	Rep'r Org. Agent	Mr ChristiaN Orr Hollins Strategic Land	Policy Site	Policy EN18: Areas of separation	The EN18 policy layer should be updated to exclude 'land west of Garstang Road, Broughton' having gained planning consent at appeal in April 2024 (app ref:06/2023/0030, appeal ref APP/N2345/W/23/3330709) for up to 51 dwellings.	Policy layer amendment request not supported. The Council's evidence base (LUC Open Land Designation Study: Landscape Assessment) details the methodological approach to the assessment of Preston's AoS and provides justification of the Council's approach. Where sites with planning consent are being built-out, sites have been removed from AoS. The omission sites (SHELAA Site Ref 19P021 & 19P305) are assessed as being located within an area of 'moderate' gap strength between Preston and Broughton. Housing monitoring evidence indicates the site is currently undeliverable with no housebuilder in-place to deliver the site, no plans have been suggested for a reserved matters application.	No	Yes
A56.1	Rep'r Org. Agent	Reaper Limited and Hulton Land Ltd Reaper Limited and Hulton Land Ltd Mr Matthew Symo	Policy Site	Policy EN18: Areas of separation	The omission site Land Off Longridge Road, Grimsargh is designated as AoS on the emerging CLLP Policies Map. It is considered that the evidence base does not justify this designation and as such, the emerging Local Plan is not sound.	The Council's evidence base (LUC Open Land Designation Study: Landscape Assessment) details the methodological approach to the assessment of Preston's AoS and provides justification of the Council's approach. The omission site (SHELAA Site Ref 19P018) is assessed as being located within a 'Fragile' gap strength between Preston and Grimsargh. The guiding principle of EN18 is to protect areas where there is a	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						risk of coalescence as set out within Criteria 1 of Policy EN18. Further, Criteria 2 of the Policy permits development within the AoS, where proposals meet the outlined assessment requirements.		
A57.1	Rep'r Org. Agent	GA Pet Food Partners Estates Ltd and Hulton Land Ltd GA Pet Food Partners Mr Matthew Symo	Policy Site	Policy EN18: Areas of separation	The rear parcel of omission site 'Land Off Whittingham Road, Longridge' is designated as AoS on the emerging CLLP Policies Map. Considers it is correct to remove the front parcel, but that the AoS designation, in its entirety, is not justifiable and, as such, the emerging local plan is not sound.	The Council's evidence base (LUC Open Land Designation Study: Landscape Assessment) details the methodological approach to the assessment of Preston's AoS and provides justification of the Council's approach. The Council's supports a brownfield first approach and promotes development in the most accessible and sustainable locations. The guiding principle of EN18 is to protect areas where there is a risk of coalescence as set out within Criteria 1 of Policy EN18. Further, Criteria 2 of the Policy permits development within the AoS, where proposals meet the outlined assessment requirements.	No	Yes
A60.17	Rep'r Org. Agent	Ms Ashleigh Genco Story Homes Mr Dan Mitchell	Policy Site	Policy EN18: Areas of separation	The authorities have not provided sufficient justification to evidence why the Areas of Separation boundaries have been extended.	The Council's evidence base (LUC Open Land Designation Study: Landscape Assessment) details the methodological approach to the assessment of Preston's AoS and provides justification of the Council's approach. The guiding principle of EN18 is to protect areas where there is a risk of coalescence as set out within Criteria 1 of Policy EN18. Further, Criteria 2 of the Policy permits development within the AoS where proposals meet the outlined assessment requirements. See responses to comments made against Policy HS1 and	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						EC1 regarding Housing and Employment requirements respectively.		
A68.4	Rep'r	Wain Homes North West	Policy	Policy EN18: Areas of separation	The Area of Separation as shown on the policies map should be reviewed in the context of omission sites at Broughton. An Area of Separation should not include land where it is not necessary to maintain the strategic gap between the settlements. Excluding the omission site from the AoS would have no impact on the gap to Preston.	The Council's evidence base (LUC Open Land Designation Study: Landscape Assessment) details the methodological approach to the assessment of Preston's AoS and provides justification of the Council's approach. The omission site (SHELAA Site Ref 19P056) is assessed as being sited within a 'moderate' gap strength. The guiding principle of EN18 is to protect areas where there is a risk of coalescence as set out within Criteria 1 of Policy EN18. Further, Criteria 2 of the Policy permits development within the AoS, where proposals meet the outlined assessment requirements.	No	Yes
	Org.	Wain Homes North West	Site					
	Agent	Stephen Harris						
B65.7	Rep'r	Messrs Rankin, Patel and Briggs	Policy	Policy EN18: Areas of separation	Policy EN18 is not sound because it fails to give sufficient recognition to those circumstances where development has been accepted in Areas of Separation and how such proposals will be considered. The supporting text should be modified to explain in more detail how the policies of the Area of Separation will be applied with reference to 'Land West of Garstang Road, Broughton' (app ref: 06/2023/0030 Appeal ref: APP/N2345/W/23/3330709)	The Council's evidence base (LUC Open Land Designation Study: Landscape Assessment) details the methodological approach to the assessment of Preston's AoS and provides justification of the Council's approach. The omission sites (SHELAA Site Ref 19P021 & 19P305) are assessed as being located within an area of 'moderate' gap strength between Preston and Broughton. Housing monitoring evidence indicates the site is currently undeliverable with no housebuilder in-place to deliver the site, no plans have been suggested for a reserved matters application. Suggested amendment to supporting text rejected.	No	Yes
	Org.	Private Individual	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D07	Rep'r	Sue Whittam	Policy	Policy EN18: Areas of separation	Support policy approach of Areas of Separation and are pleased that these are being strengthened in the proposed new plan. We also support that no development should take place outside of Grimsargh settlement boundary.	Representation in support of policy approach noted and welcomed.	No	No
	Org.	Grimsargh Parish Council	Site					
	Agent							
D20.6	Rep'r	Mrs Julie Buttle	Policy	Policy EN18: Areas of separation	Whittingham Parish Council strongly supports the area of separation between Whittingham and Longridge but believes it should be extended to include sites HS4.13 and HS4.14.	Representation in support of policy approach noted and welcomed. The Council's evidence base (LUC Open Land Designation Study: Landscape Assessment) details the methodological approach to the assessment of Preston's AoS and provides justification of the Council's approach.	No	Yes
	Org.	Whittingham Parish Council	Site					
	Agent							
D26.17	Rep'r	Ms Rachel Whitaker	Policy	Policy EN18: Areas of separation	Policies for development in or adjacent to rural areas and urban fringe should ensure they reflect the character of the countryside, as well as seeking opportunities for enhancement and improved access to nature.	Representation noted. No modification proposed.	No	No
	Org.	Natural England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)				Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy EN19: Landscape character							Count of Representations against this policy/section:		1
D26.18	Rep'r	Ms Rachel Whitaker	Policy	Policy EN19: Landscape character	The Plan including site allocations, should give great weight to conserving and enhancing designated landscapes. Policies should help in furthering the statutory purposes of designated landscapes. Policies can be informed by landscape character and sensitivity assessments. Policy should require development in these areas to meet highest design standards, environmental quality and improve access to nature. Policy should set out a definition of major development and consider how development will be managed in the setting of a designated landscape. Plan should include a policy on light pollution.	The plan recognises the importance of protecting and enhancing the landscape character across the 3 council areas. Where necessary, as identified in the Councils' Validation Requirements, a landscape and visual impact assessment (LVIA) will be required which should identify the key characteristics of the landscape and enable the impact of the proposed development on the existing character and landscape of an area to be understood. There are other policies within the Plan (EN1) which require development to meet high design standards. The definitions of major development are set out in national guidance and therefore there is no need to duplicate in local policy. Policy ST2 requires construction management plans to be produced where appropriate; these would set out how the development will be managed in the setting of a designated landscape, where necessary. Light pollution and minimising the impact on the natural environment is addressed in the plan in Policy EN9 criterion 3, and para 7.62. Policy EN14 and the supporting text requires that development typologies proposing lighting schemes specified within the Council's validation requirements, should include a lighting plan, consistent	No	No
	Org.	Natural England	Site						
	Agent								

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				with national guidance. Any mitigation measures required to prevent light spill will be secured by condition. In addition to the proposed local policies, there is also guidance on light pollution in the NPPG, which is a material consideration in planning applications. A further policy on light pollution in the Plan is therefore not considered necessary.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Chapter 8: Climate change and sustainable energy				Count of Representations against this policy/section:	1			
D13.2	Rep'r	Mr Geoff Lavery	Policy	Chapter 8: Climate change and sustainable energy	The Lancashire and Cumbria Integrated Care Board recognises the impacts of Climate Change on health and supports the requirements of the Climate Change policies within the Plan.	The Councils welcome the representation of support.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy CC1 (Strategic Policy): Climate Change				Count of Representations against this policy/section:	9			
A06.09	Rep'r	Maple Grove Developments	Policy	Policy CC1 (Strategic Policy): Climate Change	Policy requires development proposals to maximise opportunities to contribute to the delivery of net zero greenhouse gas emissions and requires an Energy Statement to demonstrate how the net zero greenhouse gas emissions target will be met. This goes further than national policy and has not been justified. Furthermore, the policy should also recognise that meeting the appropriate target may not be achievable in all cases including due to viability. Proposed mod.: Amended to reflect current national planning policy and introduce an element of flexibility where schemes are not able to meet the energy/emissions targets due to valid, evidenced reasons.	Moving to a low-carbon economy, including producing low-carbon new developments as well as developing renewable energy infrastructure, is an overarching objective of the planning system (NPPF (2024) p.5(c)). Policy CC1 – 1 a) i-ix is in line with national policy, including the NPPF and the WMS of 13/12/2023 on Local Energy Efficiency Standards. Requiring an Energy Statement for major proposals is an established local planning policy requirement and its encouragement of ensuring a net-zero greenhouse emissions approach to development does not go further than national policy contained in the NPPF. The wording "where appropriate" in paragraphs a & b of Policy CC1 provides sufficient flexibility.	No	Yes
	Org.	Maple Grove Developments	Site					
	Agent	Mr Paul Newton						
A12.8	Rep'r	Tallentine	Policy	Policy CC1 (Strategic Policy): Climate Change	Policy wording does not provide sufficient clarity to applicants regarding the requirements of the policy, and the policy is inconsistent with the forthcoming Future Homes Standard. Proposed amendments to policy wording are suggested.	It is considered that the policy provides sufficient clarity and utilises language that is already established within national policy. The proposed amendments in the representation, regarding point 1, risk convoluting the policy. The proposed amendments to part b would lead to making the policy more stringent and not allow the flexibility that is necessary when designing and adapting to the evolving impacts of	No	Yes
	Org.	Tallentine	Site					
	Agent	Mr Jonathan Ainley						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				Climate Change. It is not considered that the policy is inconsistent with the general aims of the Future Homes & Building Standards which is to require new homes to be future-proofed with low carbon heating and high levels of energy efficiency. It is acknowledged that the Future Homes Standard is set to come into force in 2025; however, as this has not yet occurred and finalised details on what this standard would entail are limited, it would be premature to amend the policy to be bound by this. The proposed amendments to point 2 of the policy seeking to specify a WLC assessment methodology are not considered appropriate. The wording "nationally recognised" provides an element of flexibility which is required to ensure the policy remains relevant and does not rely on assessment schemes which may be discontinued in the future.		
A24.13	Rep'r: Mrs Joanne Harding Org.: Home Builders Federation Agent:	Policy: Policy CC1 (Strategic Policy): Climate Change Site:	Supports the Council in seeking to reduce the amount of energy used and to improve energy efficiency in development, but only in-line with the December 2023 WMS. Reference should also be made to the Future Homes Standard & Building Regs. as the appropriate standards for development. The policy requires the calculation of the whole life cycle carbon (WLC) emissions and actions to reduce them but is not	Moving to a low-carbon economy, including producing low-carbon new developments as well as developing renewable energy infrastructure, is an overarching objective of the planning system (NPPF (2024) p.5(c)). Policy CC1 is in line with national policy, including the NPPF and the WMS of 13/12/2023 on Local Energy Efficiency Standards. It is not considered that the policy is inconsistent with the general aims of	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			clear how it will be determined what is an appropriate level of emissions or reduction. Additionally, the planning stage may be too early in the process to assess the carbon impact of a design. Any WLC policy should have consideration paid as to monitoring, and potential implications for the decision-making process, and interaction with other policies. A transitional period should be written into the policy to allow development industry preparation. The Viability Assessment does not include a cost for undertaking a WLC assessment, or costs associated with addressing any subsequent matter identified in said assessment.	the Future Homes & Building Standards which is to require new homes to be future-proofed with low carbon heating and high levels of energy efficiency. It is acknowledged that the Future Homes Standard is set to come into force in 2025; however, as this has not yet occurred and finalised details on what this standard would entail are limited, it would be premature to amend the policy to be bound by this. Requiring a WLC for major proposals is an established local planning policy requirement and its encouragement of ensuring a net-zero greenhouse emissions approach to development does not go further than national policy contained in the NPPF. A transitional period is not considered to be necessary as much of what this policy is seeking to address is already established in wider policy. The Viability Assessment is considered to be robust and has given consideration to the various Climate Change policies within the emerging Plan.		
A26.11	Rep'r: Miss Georgina Cox Org.: Gladman Developments Agent:	Policy: Policy CC1 (Strategic Policy): Climate Change Site:	It is considered that the best way to ensure a consistency of approach in addressing Climate Change, via new development, is through the use of Building Regulations, rather than via Local Plan policy.	Moving to a low-carbon economy, including producing low-carbon new developments as well as developing renewable energy infrastructure, is an overarching objective of the planning system (NPPF (2024) p.8(c)). Policy CC1 is in line with national policy, including the NPPF and the WMS of 13/12/2023	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				on Local Energy Efficiency Standards. It is not considered that the policy is inconsistent with the general aims of the Future Homes & Building Standards which is to require new homes to be future-proofed with low carbon heating and high levels of energy efficiency. It is acknowledged that the Future Homes Standard is set to come into force in 2025; however, as this has not yet occurred and finalised details on what this standard would entail are limited, it would be premature to curtail the policy without these standards in place.		
A63.1	Rep'r PWA Planning Org. PWA Planning Agent Mr Paul Walton	Policy Site	Policy CC1 (Strategic Policy): Climate Change	Policy CC1 implementing WLC assessments is too prescriptive, overly rigid and ineffective due to the process becoming a box ticking exercise.	Requiring a WLC for major proposals is an established local planning policy requirement and its encouragement of ensuring a net-zero greenhouse emissions approach to development does not go further than national policy contained in the NPPF (p.161).	No	Yes
D02.38	Rep'r Emily Hrycan Org. Historic England Agent	Policy Site	Policy CC1 (Strategic Policy): Climate Change	Any proposals aimed at combatting Climate Change should not harm a heritage asset. Proposed amendment to include “avoiding harm to the historic environment” or give reference to other Local Plan policies.	The Local Plan should be read as a whole, and as such, it is considered that the protections afforded by Policy EN13 will ensure that harm to the historic environment is avoided if Policy CC1 is triggered as a result of a Planning Application.	No	No
D11.8	Rep'r Rebecca Housam Org. Defence Infrastructure Organisation	Policy Site	Policy CC1 (Strategic Policy): Climate Change	Policy wording does not provide sufficient clarity to applicants regarding the requirements of the policy, and the policy is inconsistent with the forthcoming Future Homes Standard.	It is considered that the policy provides sufficient clarity and utilises language that is already established within national policy. The proposed amendments in the representation,	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent				regarding point 1, risk convoluting the policy. The proposed amendments to part b would lead to making the policy more stringent and not allow the flexibility that is necessary when designing and adapting to the evolving impacts of Climate Change. It is not considered that the policy is inconsistent with the general aims of the Future Homes & Building Standards which is to require new homes to be future-proofed with low carbon heating and high levels of energy efficiency. It is acknowledged that the Future Homes Standard is set to come into force in 2025; however, as this has not yet occurred and finalised details on what this standard would entail are limited, it would be premature to amend the policy to be bound by this. The proposed amendments to point 2 of the policy seeking to specify a WLC assessment methodology are not considered appropriate. The wording "nationally recognised" provides an element of flexibility which is required to ensure the policy remains relevant and does not rely on assessment schemes which may be discontinued in the future.		
D16.25	Rep'r	Mrs Lindsay Alder	Policy	Policy CC1 (Strategic Policy): Climate Change	Express support for this policy.	The representation of support is welcomed by the Councils.	No	Yes
	Org.	National Highways	Site					

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent							
D26.19	Rep'r	Ms Rachel Whitaker	Policy	Policy CC1 (Strategic Policy): Climate Change	Natural England welcome Policy CC1 and also the reference to nature-based solutions.	The representation of support is noted and welcomed by the Councils.	No	No
	Org.	Natural England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy CC2: Renewable energy generation and district heating networks						Count of Representations against this policy/section:		3
A02.04	Rep'r	Mr. Roger Bracewell	Policy	Policy CC2: Renewable energy generation and district heating networks	Policy CC2 is generally supported however, the policy should be amended to reflect paragraph 160 of the NPPF: 'very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources'. The following point should be added: (4) Renewable energy projects in the Greenbelt will need to demonstrate very special circumstances if projects are to proceed. Special circumstances may include the environmental benefits associated with increased production of energy for renewable sources.	The proposed amendment is a duplication of national policy and is therefore not necessary for inclusion.	No	Yes
	Org.	GA Pet Food Partners	Site					
	Agent	Mr. Matthew Good						
D02.39	Rep'r	Emily Hrycan	Policy	Policy CC2: Renewable energy generation and district heating networks	Any proposals to provide for renewable energy should not harm heritage assets. Proposed amendment to include "avoiding harm to the historic environment" or give reference to other Local Plan policies.	The Local Plan should be read as a whole, and as such, proposals for renewable and low carbon energy generating development considered under policy CC2 will also be assessed under Policy EN13 to ensure that harm to the historic environment is avoided.	No	No
	Org.	Historic England	Site					
	Agent							
D16.26	Rep'r	Mrs Lindsay Alder	Policy	Policy CC2: Renewable energy generation and district heating networks	Express support for this policy.	The representation of support is welcomed by the Councils.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy CC3: Reducing energy consumption				Count of Representations against this policy/section: 6		
A12.9	Rep'r Tallentine Org. Tallentine Agent Mr Jonathan Ainley	Policy Policy CC3: Reducing energy consumption Site	Policy wording does not provide sufficient clarity to applicants regarding the requirements of the policy, and the policy is inconsistent with the forthcoming Future Homes Standard. Amendments to the Policy wording are proposed.	The policy provides sufficient clarity on its requirements and there are a number of established methodologies for conducting Energy Statements which can be considered appropriate or not at the Planning Application stage. It is also considered that points 1 and 2 of the policy are sufficiently clear and the proposed wording is not inconsistent with the general aims of the Future Homes and Building Standard. A SPD on Climate Change is not considered necessary to support this policy due to a sufficient level of detail within the existing policy. The proposed amendments to point 5 of the policy risk convoluting the policy and are not considered necessary.	No	Yes
A24.14	Rep'r Mrs Joanne Harding Org. Home Builders Federation Agent	Policy Policy CC3: Reducing energy consumption Site	It is not considered necessary for all major developments to produce an Energy Statement, and where this is necessary a proportional approach should be taken to the amount of information required. Concerned regarding the need to undertake an assessment of whole life carbon emissions (WLC) and encourage the Councils to work within the nationally set standards rather than introducing alternative requirements.	Requiring an Energy Statement and WLC assessments for major proposals are an established local planning policy requirement and its encouragement of ensuring a net-zero greenhouse emissions approach to development does not go further than national policy contained in the NPPF (p.161). The Viability Assessment is considered to be robust and has given consideration to the various Climate Change policies within the emerging Plan.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Question the value of parts 3 and 4 of the policy as they are addressed elsewhere in the Plan. The Viability Assessment does not include a cost for undertaking this WLC assessment, producing an Energy Statement, or any costs associated with addressing any issues raised by these assessments. Recommended that this policy is deleted.			
A26.12	Rep'r Miss Georgina Cox Org. Gladman Developments Agent	Policy Policy CC3: Reducing energy consumption Site	It is considered that the best way to ensure a consistency of approach in addressing Climate Change, via new development, is through the use of Building Regulations, rather than via Local Plan policy.	Moving to a low-carbon economy, including producing low-carbon new developments as well as developing renewable energy infrastructure, is an overarching objective of the planning system (NPPF (2024) p.5(c)). Policy CC1 is in line with national policy, including the NPPF and the WMS of 13/12/2023 on Local Energy Efficiency Standards. It is not considered that the policy is inconsistent with the general aims of the Future Homes & Building Standards which is to require new homes to be future-proofed with low carbon heating and high levels of energy efficiency. It is acknowledged that the Future Homes Standard is set to come into force in 2025; however, as this has not yet occurred and finalised details on what this standard would entail are limited, it would be premature to curtail the policy without these standards in place.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D02.40	Rep'r	Emily Hrycan	Policy	Policy CC3: Reducing energy consumption	Historic England welcomes the reference to the need to consider other Local Plan Policies, including the historic environment.	The representation of support is welcomed by the Councils.	No	No
	Org.	Historic England	Site					
	Agent							
D11.9	Rep'r	Rebecca Housam	Policy	Policy CC3: Reducing energy consumption	Policy wording does not provide sufficient clarity to applicants regarding the requirements of the policy, and the policy is inconsistent with the forthcoming Future Homes Standard. Amendments to the Policy wording are proposed.	The policy provides sufficient clarity on its requirements and there are a number of established methodologies for conducting Energy Statements which can be considered appropriate or not at the Planning Application stage. It is also considered that points 1 and 2 of the policy are sufficiently clear and the proposed wording is not inconsistent with the general aims of the Future Homes and Building Standard. A SPD on Climate Change is not considered necessary to support this policy due to a sufficient level of detail within the existing policy. The proposed amendments to point 5 of the policy risk convoluting the policy and are not considered necessary.	No	Yes
	Org.	Defence Infrastructure Organisation	Site					
	Agent							
D16.27	Rep'r	Mrs Lindsay Alder	Policy	Policy CC3: Reducing energy consumption	Where applicable, National Highways will work with Central Lancashire to implement the expansion of electric vehicle charging infrastructure, in adherence to this policy.	The representation is noted and the Councils appreciate the indication of support from National Highways.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy ST1 (Strategic Policy): Strategic transport priorities				Count of Representations against this policy/section:		1
D16.28	Rep'r Mrs Lindsay Alder Org. National Highways Agent	Policy ST1 (Strategic Policy): Strategic transport priorities Site	Supports policy.	Support is welcome.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy ST2: Sustainable and active travel				Count of Representations against this policy/section: 8		
A12.10	Rep'r Tallentine Org. Tallentine Agent Mr Jonathan Ainley	Policy Policy ST2: Sustainable and active travel Site	Modifications to criteria 4 and 5b are necessary to be consistent with NPPF paras 58 and 116 respectively. The representor proposes the following modifications: Criterion 4: Where evidence shows that it is required, contributions may will be sought towards projects identified within the Central Lancashire Local Cycling and Walking Infrastructure Plan. Criterion 5b: Any unacceptable detrimental impacts (in terms of capacity and congestion) upon the highway network are mitigated to the satisfaction of the relevant Highway Authority;	Criterion 4 makes the reasonable assumption that there will always be an evidential basis for seeking contributions. This modification proposed to Criterion 5b is unnecessary. The sentence "mitigated to the satisfaction of the relevant Highway Authority" already qualifies whether the determinantal impacts are "unacceptable".	No	Yes
A41.9	Rep'r Rowland Homes Limited Org. Rowland Homes Limited Agent Mr Brian O Connor	Policy Policy ST2: Sustainable and active travel Site	Several criteria lack clarity: Criteria 2d is unclear whether it exclusively refers to existing public transport. Criteria 4 and 7 should reference the tests set out in NPPF para 58.	Criterion 2d does not differentiate between existing and proposed public transport provision. Regarding criteria 4 and 7, it is not necessary or helpful to repeat national policy within the Local Plan. It is understood that not every scheme will be able to accommodate a bus route. Criteria 5c therefore qualifies the policy requirement with the term "where appropriate".	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					Criteria 5c is unreasonable as not all development can accommodate bus routes.			
A61.12	Rep'r	Mr Rob Haslam	Policy	Policy ST2: Sustainable and active travel	Contributions towards cycling/walking infrastructure and projects identified within Transport Statements required by criteria 4 and 7 should meet the tests in NPPF para 57.	Noted.	No	Yes
	Org.	Harworth Estates	Site					
	Agent	Mr Brian O Connor						
B33.1	Rep'r	Mr Nigel Healy	Policy	Policy ST2: Sustainable and active travel	Every home built in Longton makes it less safe to bike in the area. Housing plans are discouraging cycling. Housing should be bound to city centres and the countryside should not have housing. Stop all planning permission for Hutton and Longton and force Preston, Leyland, Chorley, who each have train stations, to increase their allocations. Housing in Longton needs to totally halt – it will worsen travel and create congestion.	The CLLP promotes sustainable development – Policy SS2 confirms that the scale and location of development growth and supporting investment across Central Lancashire will reflect a settlement hierarchy, with Preston urban area (Tier 1), Leyland and Chorley (Tier 2) being the primary and secondary focus of new development because they are more sustainable settlements with greater transport and service provision. However, as paragraph 3.16 explains, an appropriate and proportionate level of development in smaller and rural settlements is important in supporting the economic vitality and viability of local communities. Policy ST2 requires new development to promote sustainable and active travel. Major developments shall be accompanied by a Transport Assessment and Travel Plan. Travel Plans work to increase opportunities for walking, cycling or using public transport.	No	Yes
	Org.	Private Individual	Site	HS3.3				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B56	Rep'r	Mrs Caroline Smith	Policy	Policy ST2: Sustainable and active travel	Objection: 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.	Evidence received from the County Council does not suggest an increase in traffic congestion that would be unacceptable and/or could not be mitigated. The Plan's Transport Study is exploring solutions, which will prioritise sustainable transport. Note that at the planning application stage, a Transport Assessment and Travel Plan will be required by Policy ST2 which will set out the mitigation measures to be secured by planning condition and/or obligation.	No	No
	Org.	Private Individual	Site					
	Agent							
B58	Rep'r	Lee Johnson	Policy	Policy ST2: Sustainable and active travel	Objection: Chapel Lane suffers congestion, particularly at school opening/closing. There should be an access from the A59.	Evidence received from the County Council does not suggest an increase in traffic congestion that would be unacceptable and/or could not be mitigated. The Plan's Transport Study is exploring solutions, which will prioritise sustainable transport. Note that at the planning application stage, a Transport Assessment and Travel Plan will be required by Policy ST2 which will set out the mitigation measures to be secured by planning condition and/or obligation. Access from the A59 is unlikely to be feasible.	No	Yes
	Org.	Private Individual	Site					
	Agent							
D11.10	Rep'r	Rebecca Housam	Policy	Policy ST2: Sustainable and active travel	Modifications to criteria 4 and 5b are necessary to be consistent with NPPF paras 58 and 116 respectively.	See response to Representation ref: A12.10.	No	Yes
	Org.	Defence Infrastructure Organisation	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D16.29	Rep'r	Mrs Lindsay Alder	Policy	Policy ST2: Sustainable and active travel	Supports policy.	Support is welcome.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy ST3: Parking standards						Count of Representations against this policy/section:		2
D16.30	Rep'r	Mrs Lindsay Alder	Policy	Policy ST3: Parking standards	Supports policy.	Support is welcome.	No	Yes
	Org.	National Highways	Site					
	Agent							
D20.8	Rep'r	Mrs Julie Buttle	Policy	Policy ST3: Parking standards	2/3 bed houses are required to provide 2 car parking spaces. Schools are required to provide 2 spaces per classroom. In the rural area, more people are car dependent. A 3-bed home should provide 3 car parking spaces. Frequent parking/congestion problems around schools is a threat to child safety. Schools should therefore include a car park.	The proposed parking standards are well established and proportionate to their development typology. Criteria 3 enables the standards to be applied flexibly however, by adapting to local circumstances including evidence of existing parking congestion (3d)).	No	Yes
	Org.	Whittingham Parish Council	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy ID1 (Strategic Policy): Infrastructure Planning Principles						Count of Representations against this policy/section:		7
A61.10	Rep'r	Mr Rob Haslam	Policy	Policy ID1 (Strategic Policy): Infrastructure Planning Principles	An updated site specific viability appraisal should be undertaken for site allocation SS5: Preston West which factors in all relevant infrastructure requirements, and further engagement conducted with Harworth to understand all likely infrastructure requirements, how they are expected to be delivered, and additional funding mechanisms. The relevant infrastructure requirements that should be appraised in an updated viability appraisal should include a requirement to facilitate the delivery of a bridge over the existing railway line to provide a link between the development parcels at Phases A and B (land south of the railway) and/or a new junction off Edith Rigby Way.	The council are committed to continued working with Harworth and Tallentine on delivery of this site and in the preparation of a Masterplan for delivery which will consider in more detail delivery of key infrastructure. No changes to the viability assessment are considered necessary at this time.	No	Yes
	Org.	Harworth Estates	Site					
	Agent	Mr Brian O Connor						
B36	Rep'r	Mrs Joanna Whitworth	Policy	Policy ID1 (Strategic Policy): Infrastructure Planning Principles	The Chapel Lane – Longton large development, the plan is not showing specific evidence of how the infrastructure will be altered to accommodate the extra housing. The proposed change will not support the local community and environment, it will harm it as the extra housing will affect safety (traffic/access) and wellbeing of the existing residents of Longton.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including	No	No
	Org.	Private Individual	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. Detailed proposals for access and infrastructure to support the site would be brought forward at planning application stage.		
B37	Rep'r	Ms Janis Bowyer	Policy	Policy ID1 (Strategic Policy): Infrastructure Planning Principles	The Local Plan does not take into account that the local infrastructure cannot cope with the proposed increase in residents. Highways are already congested and unsuitable for the significant increase these developments will generate. The impact the development will have on schools, doctors, dentists and the environment must also be taken into consideration.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities, the highways authority and health and education providers, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. Detailed proposals for access and	No	No
	Org.	Private Individual	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						infrastructure to support the site would be brought forward at planning application stage.		
B68	Rep'r	Peter Smith	Policy	Policy ID1 (Strategic Policy): Infrastructure Planning Principles	The development proposed for Chapel Lane will exacerbate the existing drainage/ sewage issues in the locality. United Utilities are aware of the issue which should be rectified before any further development is considered.	The Councils have undertaken a series of assessments (including the SHELAA, SFRA and highways assessments) to inform the selection and allocation of residential development sites. The CLLP allocation is accompanied by a series of Key Development Considerations, informed by that evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage. The Councils continue to work with infrastructure providers, including United Utilities, to understand any relevant constraints and necessary mitigation. The KDCs confirm developers will be required to provide appropriate solutions through the development. Detailed proposals for infrastructure to support the site would be brought forward at planning application stage.	No	No
	Org.	Private Individual	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D13.5	Rep'r	Mr Geoff Lavery	Policy	Policy ID1 (Strategic Policy): Infrastructure Planning Principles	The Councils work closely with key stakeholders in the health and wellbeing sector, including the Lancashire and South Cumbria Integrated Care Board (ICB) and the Council's Public Health department, to ensure a coordinated approach for effective collection of developer contributions to fund new health facilities in the borough. The primary method of calculating developer contributions will consider the likely impact of new population. S106 / CIL contributions may be required to support construction or development plan costs for additional facilities/extension etc or new health facilities that may be co-located with other health or social care providers, as advised by ICB or relevant health provider. The ICB has a s106/CIL policy which sets out how the Board will engage with local authorities when planning applications impact on local health infrastructure, and, the principles upon which the ICB will exercise its responsibilities for making recommendations on the allocation of health related S106 and CIL allocations. As a strategic partner, the ICB will continue to engage with the Council throughout the plan period and respond where necessary to any windfall sites, planned or unplanned schemes.	Noted. The Council will continue to work with the ICB/NHS to ensure that there is adequate health provision as a result of new developments across the area.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D15.01	Rep'r	Andrew Leyssens	Policy	Policy ID1 (Strategic Policy): Infrastructure Planning Principles	Concerns regarding any large site allocations which are in multiple land ownerships. Encourage early contact with all landowners/site promoters and challenge those landowners on how they intend to work together, preferably as part of a legally binding delivery framework and / or masterplan. Future policy should require applicants to provide drainage strategies for foul and surface water. For larger sites, policy should require applicants to prepare an infrastructure phasing and delivery strategy. For strategic sites, early consideration should be given to the infrastructure strategy as part of the preparation of the local plan and to ensure a co-ordinated approach to the delivery of new development and infrastructure. We recommend the following policy is included Policy ID1: 'Where applications are submitted on land which is part of a wider allocation, applicants will be required to submit allocation-wide infrastructure strategies to demonstrate how the site will be brought forward in a co-ordinated manner. The strategies shall be prepared in liaison with infrastructure providers and demonstrate how each phase interacts with other phases and ensure coordination between phases of the development over lengthy time periods and by numerous developers.	The more complex CLLP allocations are accompanied by a series of Key Development Considerations, informed by evidence, that guide how development should be brought forward on the site, including requirements relating to flooding and drainage, highways / traffic and ecology. The Councils continue to work with infrastructure providers, including United Utilities. The KDCs confirm developers will be required to provide appropriate solutions through the development. Where deemed necessary, the KDCs require the production of an Infrastructure Delivery Schedule to support the proposals. The proposed modification to the policy is not considered appropriate. It would not be reasonable to require developers to produce allocation wide Infrastructure Delivery Schedules if they only control part of the site. The KDCs will require applicants to work with United Utilities and other infrastructure providers to ensure an appropriate solution for their scheme.	No	Yes
	Org.	United Utilties	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					Where necessary, the strategy must be updated to reflect any changing circumstances between phase(s) during the delivery of the development.'			
D16.31	Rep'r	Mrs Lindsay Alder	Policy	Policy ID1 (Strategic Policy): Infrastructure Planning Principles	National Highways is supportive of this approach to the phasing of larger developments and are open to working with both Central Lancashire and Developers at the early stages of proposals in order to identify any mitigation and / or phasing strategies which may be required to reduce the impact of proposals on the SRN.	Support noted.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy ID2: Developer contributions and planning obligations						Count of Representations against this policy/section:		11
A12.5	Rep'r	Tallentine	Policy	Policy ID2: Developer contributions and planning obligations	As drafted it is not clear what actions the decision maker should take if a scheme is unviable. Proposed additional wording "should a development be unviable, lesser or no contributions will be required towards the delivery and maintenance of those items listed under limb 2. The level of contribution will be assessed on an individual basis and linked to the extent which the development is unviable"	It is acknowledged that developer contributions can affect the financial viability of certain developments and will therefore not always be appropriate or reasonable to apply. Based on an independent viability assessment, developer contributions may be reduced or discounted where this would not make the development unacceptable in planning terms. The level of contribution required will be informed by the Viability Assessment and will be assessed on a site by site basis. As the policy already indicates that the level of contribution required will be based on the independent Viability Assessment, the suggested amendment is not considered necessary.	No	Yes
	Org.	Tallentine	Site					
	Agent	Mr Jonathan Ainley						
A38.6	Rep'r	Taylor Wimpey UK Limited	Policy	Policy ID2: Developer contributions and planning obligations	Acknowledge contributions are required however it is critical that level is reasonable and proportionate in accordance with NPPF. Monitoring fees should be fair and reasonable. Recognition of the specific requirements of the CIL Regulations should be referenced in the Policy.	Comments noted. The justification text for the proposed policy acknowledges that planning obligations must comply with paragraph 56 of the National Planning Policy Framework and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, including being: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind	No	Yes
	Org.	Taylor Wimpey UK Limited	Site					
	Agent	Ms Alexandra Gavi						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				to the development. Contributions, and monitoring fees, will always be required to a level that is reasonable and proportionate. All relevant national policies, such as the CIL regulations, are a material consideration in the planning application process and there is no need to duplicate in local policies.		
A41.8	Rep'r Rowland Homes Limited Org. Rowland Homes Limited Agent Mr Brian O Connor	Policy Site	Policy ID2: Developer contributions and planning obligations	Requirements for financial obligations should be fully justified and based on a credible evidence base. The financial contributions requested should meet the tests set out in Paragraph 58 of the NPPF. Rowland requests that the Policy is updated to make reference to the aforementioned tests and that it is made clear that any financial contributions will be considered in this context. Rowland is also concerned with the list of potential contributions listed at Part 2 of the Policy, in particular the inclusion of "biodiversity offsetting", as this is covered under separate Biodiversity Net Gain Legislation. It is not clear what is required, however there is concern that contributions toward this could be unviable if developers are seeking to purchase off site units/credits to meet a 10% net gain for biodiversity. This has not been fully addressed and evidenced	As national planning guidance, the NPPF is the overarching material consideration for planning applications. The policies within the Local Plan are written to be in accordance with the NPPF that is in place at the time. However, it is not considered necessary to duplicate large sections of the NPPF in local policy, when the NPPF is a material consideration in planning applications anyway. There is also the risk that the policy would become out of date if a new NPPF was published. The justification text for the policy acknowledges that planning obligations must comply with paragraph 56 of the National Planning Policy Framework and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, including being: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					in the viability report. CIL must not result in developments being subject to double charging. The monitoring fee must be proportionate and reasonable.	related in scale and kind to the development. Biodiversity offsets are conservation activities designed to provide biodiversity benefits to compensate for losses, and to help developers address the mitigation hierarchy and ensure 'no net loss'. Whilst BNG is now the main tool for securing biodiversity offsetting, there may be circumstances where alternative provision for offsetting measures is required – for example, under the BNG legislation and the transitionary arrangements not all planning applications will be subject to mandatory BNG and alternative offsetting may be required to make a development acceptable. The inclusion of biodiversity offsetting therefore provides appropriate flexibility within the policy. In relation to monitoring fees, these will be set at appropriate levels by the Councils		
A45.12	Rep'r Org. Agent	Taylor Wimpey UK Limited Taylor Wimpey UK Limited Megan Wilson	Policy Site	Policy ID2: Developer contributions and planning obligations	Acknowledge contributions are required however it is critical that their level is reasonable and proportionate in accordance with NPPF. Monitoring fees should be fair and reasonable. Recognition of the specific requirements in relation to this should be referenced in the Policy.	Comments noted. Development places additional demand on service and facilities, impacting on the ability of those services to meet the needs of the community. To address these demands new infrastructure or improvements to existing facilities will need to be provided. Developer contributions will be secured through a variety of means, including by planning conditions and legal agreements under	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				S106 of the Town and Country Planning Act (1990), where developments require local mitigation based on direct impact. Contributions, and monitoring fees, will be set by the Councils at appropriate levels. All relevant national policies, such as the CIL regulations, are a material consideration in the planning application process and there is no need to duplicate in local policies. The justification text for the policy acknowledges that planning obligations must comply with paragraph 56 of the National Planning Policy Framework and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, including being: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.		
A61.11	Rep'r Mr Rob Haslam Org. Harworth Estates Agent Mr Brian O Connor	Policy Site	Policy ID2: Developer contributions and planning obligations	Any Infrastructure requirements sought from this policy should meet the requirements set out in paragraph 57 of the NPPF. The policy should be updated to refer to the above tests. This will ensure developer contributions are considered in line with the NPPF. Biodiversity offsetting has been included as a potential contribution. Under BNG legislation a 10% net gain is required to be delivered on new developments. There is no reason for this to be included	As national planning guidance, the NPPF is the overarching material consideration for planning applications. The policies within the Local Plan are written to be in accordance with the NPPF that is in place at the time. However, it is not considered necessary to duplicate large sections of the NPPF in local policy, when the NPPF is a material consideration in planning applications anyway. There is also the risk that the policy would become out of date if a new NPPF was published. The	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			as it is already covered by statutory legislation. The use of CIL must not result in developments being subject to double charging. There should be greater clarity provided on when planning obligations will be sought and when CIL will be charged. NPPF and PPG are clear that monitoring fees must be proportionate and reasonable. Reference should be provided to the requirement for monitoring fees to be proportionate and reasonable, as required by the NPPF and PPG.	justification text for the policy acknowledges that planning obligations must comply with paragraph 56 of the National Planning Policy Framework and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, including being: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Biodiversity offsets are conservation activities designed to provide biodiversity benefits to compensate for losses, and to help developers address the mitigation hierarchy and ensure 'no net loss'. Whilst BNG is now the main tool for securing biodiversity offsetting, there may be circumstances where alternative provision for offsetting measures is required – for example, under the BNG legislation and the transitionary arrangements not all planning applications will be subject to mandatory BNG and alternative offsetting may be required to make a development acceptable. The inclusion of biodiversity offsetting therefore provides appropriate flexibility within the policy In relation to monitoring fees, these would always be charged in accordance with the NPPF and it is therefore not necessary to duplicate this in local policy.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A65.7	Rep'r	Bloor Homes Limited	Policy	Policy ID2: Developer contributions and planning obligations	Any Infrastructure requirements sought from this policy should meet the requirements set out in paragraph 57 of the NPPF. Bloor consider that the policy should be updated to refer to the above tests. This will ensure developer contributions are considered in line with the NPPF. The use of CIL must not result in developments being subject to double charging. There should be greater clarity provided on when planning obligations will be sought and when CIL will be charged. NPPF and PPG are clear that monitoring fees must be proportionate and reasonable. Reference should be provided to the requirement for monitoring fees to be proportionate and reasonable, as required by the NPPF and PPG.	As national planning guidance, the NPPF is the overarching material consideration for planning applications. The policies within the Local Plan are written to be in accordance with the NPPF that is in place at the time. However, it is not considered necessary to duplicate large sections of the NPPF in local policy, when the NPPF is a material consideration in planning applications anyway. There is also the risk that the policy would become out of date if a new NPPF was published. CIL allows local authorities to apply a standard charge which will contribute to the costs of infrastructure arising from new development. The levy is intended to provide infrastructure to support development of an area, which differs to the role of planning obligations (S.106s) which are used to ensure that individual developments are acceptable in planning terms. Any CIL monies raised are spent on projects listed in the Infrastructure Delivery Schedule, whereas S106 monies are spent on local works which would make the development acceptable in planning terms, and as such double charging does not occur. Monitoring fees set by the Councils will be reasonable and proportionate.	No	Yes
	Org.	Bloor Homes Limited	Site					
	Agent	Mr Harry Russell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D02.41	Rep'r	Emily Hrycan	Policy	Policy ID2: Developer contributions and planning obligations	The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable development and this is supported by the PPG as well. Heritage assets should be included on the list of developer contributions. This change will reflect the requirements of national policy on this matter.	Policy ID2 confirms that development is expected to contribute to mitigating its impact on services, facilities, infrastructure and the natural environment, as a result of additional demand and impacts caused by new development. It is not clear how heritage assets would commonly be impacted by new development to warrant a specific listing with part (2) of the policy. Any site-specific contributions which may arise can be addressed as item (k) within the list.	No	No
	Org.	Historic England	Site					
	Agent							
D11.11	Rep'r	Rebecca Housam	Policy	Policy ID2: Developer contributions and planning obligations	As drafted it is not clear what actions the decision maker should take if a scheme is unviable. Proposed additional wording “should a development be unviable, lesser or no contributions will be required towards the delivery and maintenance of those items listed under limb 2. The level of contribution will be assessed on an individual basis and linked to the extent to which the development is unviable”	It is acknowledged that developer contributions can affect the financial viability of certain developments and will therefore not always be appropriate or reasonable to apply. Based on an independent viability assessment, developer contributions may be reduced or discounted where this would not make the development unacceptable in planning terms. The level of contribution required will be informed by the Viability Assessment and will be assessed on a site by site basis. As the policy already indicates that the level of contribution required will be based on the independent Viability Assessment, the suggested amendment is not considered necessary.	No	Yes
	Org.	Defence Infrastructure Organisation	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
D13.6	Rep'r	Mr Geoff Lavery	Policy	Policy ID2: Developer contributions and planning obligations	The primary method of calculating developer contributions will consider the likely impact of new population. S106 / CIL contributions may be required to support construction or development plan costs for additional facilities/extension etc or new health facilities that may be co-located with other health or social care providers, as advised by ICB or relevant health provider. The ICB has a s106/CIL policy which sets out how the Board will engage with local authorities when planning applications impact on local health infrastructure, and the principles upon which the ICB will exercise its responsibilities for making recommendations on the allocation of health related S106 and CIL allocations. As a strategic partner, the ICB will continue to engage with the Councils throughout the plan period and respond where necessary to any windfall sites, planned or unplanned schemes.	Noted. The Councils will continue to work with the ICB/NHS to ensure that there is adequate health provision as a result of new developments across the area.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site					
	Agent							
D14.2	Rep'r	Mr Daniel Fleet	Policy	Policy ID2: Developer contributions and planning obligations	Draft Policy ID2 states that new development will be expected to contribute to mitigating its impact on infrastructure, services and environment and to contribute towards the requirements of the community. As drafted the policy is sound, accounting for healthcare infrastructure needs which arise from housing growth. We request that the Councils continue their engagement with the NHS to further refine the identified healthcare needs	Noted.	No	No
	Org.	NHS Property Services	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					and proposed solutions to support the level of growth proposed by the Local Plan, as identified in the IDP, prior to submission.			
D16.14	Rep'r	Mrs Lindsay Alder	Policy	Policy ID2: Developer contributions and planning obligations	National Highways are open to working with Central Lancashire and Developers on any required mitigation measures on the SRN which may be required to allow development to come forward. National Highways would also be likely to support any mitigations on the LRN which may indirectly benefit the SRN by reducing the overall requirements to travel to / from development sites by private vehicles. National Highways will work with stakeholders to identify any areas of funding such as those identified within the Policy to allow development to be bought forward whilst minimising financial impacts, as per the Circular 01/2022 paragraph 52.	Support noted.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Policy ID3: Digital and communications infrastructure						Count of Representations against this policy/section:		3
A24.15	Rep'r	Mrs Joanne Harding	Policy	Policy ID3: Digital and communications infrastructure	The inclusion of digital infrastructure such as high-speed broadband and fibre is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers. Service providers are the only ones who can confirm access to infrastructure. The HBF considers that in seeking to provide broadband and fibre to homes the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. As the Council are no doubt aware part R of the Building Regulations: Physical Infrastructure and network connections to new dwellings require all new build dwellings to be installed with the gigabit-ready physical infrastructure connections subject to a cost cap of £2,000 per dwelling. These requirements mean that there is no need for the inclusion of part 2 of this policy. Therefore, the HBF recommends that Part 2 of the policy is deleted from the local plan.	The NPPF states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Access to full fibre broadband is vital to delivering a sustainable local economy, supporting education and home working, and increasing community cohesion through digital communication. The policy does not require developers to provide the infrastructure themselves, but instead requires engagement with providers, to ensure that there is potential for full fibre broadband for future occupiers/ users and that details are provided on how the infrastructure provider will deliver this. There is therefore no need to amend the policy.	No	Yes
	Org.	Home Builders Federation	Site					
	Agent							
D02.42	Rep'r	Emily Hrycan	Policy	Policy ID3: Digital and communications infrastructure	The NPPF states that positively conserving and enhancing the historic environment is an important component of the drive to achieve sustainable	The policy as worded ensures that ecology, areas of landscape importance or the historic environment are protected from harm from development	No	No
	Org.	Historic England	Site					

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent				development and this is supported by the PPG as well. Any proposals to provide for Digital and Communications Infrastructure should not harm a heritage asset. This change will reflect the requirements of national policy on this matter. The text of 1c should read: Developments should not harm ecology, areas of landscape importance or the historic environment, unless it can be demonstrated that no technically acceptable alternative site is available, and the public benefits of the proposal outweigh the harm caused.	of digital and communications infrastructure. The requirement that development should not have an unacceptable impact allows for development whilst also ensuring that there are no adverse impacts. No modification is needed to the policy.		
D13.15	Rep'r	Mr Geoff Lavery	Policy	Policy ID3: Digital and communications infrastructure	We encourage the Local Plan to prioritise digital infrastructure as a foundational component of community development and to enable NHS partners to deliver virtual care models, real-time diagnostics and digital first primary and secondary care pathways.	Comments noted. The Plan recognises the importance of high quality, reliable digital infrastructure, and seeks to ensure there is high speed connectivity and access to this infrastructure for all.	No	No
	Org.	Lancashire & South Cumbria Integrated Care Board	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Appendix 1: Parking Standards					Count of Representations against this policy/section:		1
D16.35	Rep'r	Mrs Lindsay Alder	Policy	Appendix 1: Parking Standards	National Highways are supportive of this approach	Support is welcomed.	No	Yes
	Org.	National Highways	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Appendix 2 - The Monitoring Framework				Count of Representations against this policy/section:		4
A24.16	Rep'r: Mrs Joanne Harding Org.: Home Builders Federation Agent:	Policy: Appendix 2 - The Monitoring Framework Site:	The Monitoring Framework should provide details as to how the plan will be monitored, and identify when, why and how actions will be taken to address any issues identified by the Monitoring Framework.	It is considered that the 'Source' column in The Monitoring Framework sufficiently addresses how the indicators will be monitored. It is not considered necessary for The Monitoring Framework within the Local Plan to address matters such as when, why and how actions will be taken to handle issues identified as this will be adequately addressed by annual Authority Monitoring Reports following the adoption of the Local Plan.	No	Yes
A39.11	Rep'r: Castle Green Homes Org.: Castle Green Homes Agent: Mrs Kerry Walker	Policy: Appendix 2 - The Monitoring Framework Site:	The Monitoring Framework should provide details as to how the plan will be monitored, and identify when, why and how actions will be taken to address any issues identified by the Monitoring Framework.	It is considered that the 'Source' column in The Monitoring Framework sufficiently addresses how the indicators will be monitored. It is not considered necessary for The Monitoring Framework within the Local Plan to address matters such as when, why and how actions will be taken to handle issues identified as this will be adequately addressed by annual Authority Monitoring Reports following the adoption of the Local Plan.	No	Yes
A67.11	Rep'r: L&Q Org.: L&Q Agent: Mr Phil Robinson	Policy: Appendix 2 - The Monitoring Framework Site:	The Monitoring Framework should provide details as to how the plan will be monitored, and identify when, why and how actions will be taken to address any issues identified by the Monitoring Framework.	It is considered that the 'Source' column in The Monitoring Framework sufficiently addresses how the indicators will be monitored. It is not considered necessary for The Monitoring Framework within the Local Plan to address matters such as when, why and how actions will be taken to handle issues identified as this will be	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						adequately addressed by annual Authority Monitoring Reports following the adoption of the Local Plan.		
D02.43	Rep'r	Emily Hrycan	Policy	Appendix 2 - The Monitoring Framework	There is no section on how the historic environment will be monitored.	It is considered that there are sufficient national monitoring schemes, such as the annual Heritage at Risk register, to ensure a robust monitoring scheme is in place which covers the historic assets within the Plan area.	No	No
	Org.	Historic England	Site					
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Appendix 3: Housing trajectories						Count of Representations against this policy/section:		5
A17.2	Rep'r	Persimmon Homes and Charles Church Lancashire	Policy	Appendix 3: Housing trajectories	The Central Lancashire housing 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.	There is no requirement to provide a 20% buffer in Local Plans in relation to housing supply. There is a sufficient contingency. The housing trajectory is based on the housing land supply position on 1st April 2024. Prior to the Local Plan Examination an updated housing trajectory will be prepared with a base date of 1st April 2025. This will include all new permissions granted in 2024/25 on sites not already included in the supply which will further boost supply.	No	Yes
	Org.	Persimmon Homes and Charles Church Lancashire	Site					
	Agent	Stephen Harris						
A39.12	Rep'r	Castle Green Homes	Policy	Appendix 3: Housing trajectories	Request for the exact supply of homes and their trajectory to be provided for further scrutiny at the Examination.	Request noted. The Councils can provide this information if requested by the Inspector.	No	Yes
	Org.	Castle Green Homes	Site					
	Agent	Mrs Kerry Walker						
A67.12	Rep'r	L&Q	Policy	Appendix 3: Housing trajectories	Request for the exact supply of homes and their trajectory to be provided for further scrutiny at the Examination.	Request noted. The Councils can provide this information if requested by the Inspector.	No	Yes
	Org.	L&Q	Site					
	Agent	Mr Phil Robinson						
A68.5	Rep'r	Wain Homes North West	Policy	Appendix 3: Housing trajectories	The Central Lancashire housing trajectory has an additional supply which equates to an allowance of 9%. A greater supply is needed to meet this requirement. This is because a flexibility allowance is required to respond to changing circumstances i.e. slippage in the delivery from strategic	There is no requirement to provide a 20% buffer in Local Plans in relation to housing supply. There is a sufficient contingency. The housing trajectory is based on the housing land supply position on 1st April 2024. Prior to the Local Plan Examination an updated	No	Yes
	Org.	Wain Homes North West	Site					
	Agent	Stephen Harris						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					sites. Insufficient land has been allocated to meet the requirements of 23,625 dwellings. There should be a buffer of at least 20% to provide flexibility in the housing land supply.	housing trajectory will be prepared with a base date of 1st April 2025. This will include all new permissions granted in 2024/25 on sites not already included in the supply which will further boost supply.		
D04.08	Rep'r Org. Agent	Laura Marchant Homes England	Policy Site	Appendix 3: Housing trajectories	Homes England have provided housing trajectories for the sites they own.	Homes England previously provided the Councils with trajectories for their sites which were factored into the housing trajectories included in the Local Plan.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Appendix 4: Housing allocations - key development considerations					Count of Representations against this policy/section:		1
D16.36	Rep'r	Mrs Lindsay Alder	Policy	Appendix 4: Housing allocations - key development considerations	Noted. The Councils will continue to work cooperatively with National Highways.	No	Yes
	Org.	National Highways	Site				
	Agent						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Appendix 5: Employment allocations - key development considerations					Count of Representations against this policy/section:		1
D16.37	Rep'r	Mrs Lindsay Alder	Policy	Appendix 5: Employment allocations - key development considerations	Noted. The Councils will continue to work cooperatively with National Highways.	No	Yes
	Org.	National Highways	Site				
	Agent			A number of the sites in Appendix 5 are located within reasonable proximity of each other. For such sites, National Highways would expect the Councils to drive a coordinated approach to understanding the potential cumulative impacts and identify appropriate mitigation, whilst avoiding a detrimental impact on the SRN			

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Appendix 6: Mixed use allocations - key development considerations					Count of Representations against this policy/section:		1
D16.38	Rep'r	Mrs Lindsay Alder	Policy	Appendix 6: Mixed use allocations - key development considerations	Noted. The Councils will continue to work cooperatively with National Highways.	No	Yes
	Org.	National Highways	Site				
	Agent						

A number of the sites in Appendix 6 are located within reasonable proximity of each other. For such sites, National Highways would expect the Councils to drive a coordinated approach to understanding the potential cumulative impacts and identify appropriate mitigation, whilst avoiding a detrimental impact on the SRN.

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Omission Sites (Chorley)				Count of Representations against this policy/section: 21		
A02.02	Rep'r: Mr. Roger Bracewell Org.: GA Pet Food Partners Agent: Mr. Matthew Good	Policy: Omission Sites (Chorley) Site: SHELAA 19C050	There is a significant deficit against employment need proposed to be allocated in Chorley. Further allocations should therefore be provided. GA Pet Foods needs further room to expand its current operations within Buckshaw Village. A site at Euxton Park Golf Centre has been identified, yet only a small part has been assessed. It is unclear why the full extent of the sit was not assessed.	This site was previously suggested to the Council. It is located in the Green Belt and a small part of the site is previously developed. In accordance with the SHELAA only the previously developed part of the site was assessed through the SHELAA. The site was subsequently not selected for allocation as Green Belt release was not required to meet the employment need. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment growth. As the Councils can meet their need for employment within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes
A08.02	Rep'r: Applethwaite Ltd Org.: Applethwaite Ltd Agent: Mr Graham Love	Policy: Omission Sites (Chorley) Site: SHELAA 19C135	Applethwaite has proposed two sites for allocation for inclusively grouped age restricted specialist bungalow redevelopments. The release of the sites will not harm the function of the Green Belt in Chorley as a whole and there are no technical and environmental constraints to development.	These sites were previously suggested to the Council but were not considered for allocation as they are greenfield sites in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						need for homes within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.		
A11	Rep'r Org. Agent	Applethwaite Ltd Applethwaite Ltd Mrs Louise Leyland	Policy Site	Omission Sites (Chorley) SHELAA 19C421	The site has the potential to deliver a housing development on the edge of a thriving village. No environmental or technical issues have been identified. The site is located sustainably. Applethwaite seek to promote the site specifically for older persons housing. The site would comply with the definition of grey belt.	This site was previously suggested to the Council but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for homes within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes
A17.6	Rep'r Org. Agent	Persimmon Homes and Charles Church Lancashire Persimmon Homes and Charles Church Lancashire Stephen Harris	Policy Site	Omission Sites (Chorley) SHELAA 19C020	This site comprises a site area of approximately 26.3ha to the eastern edge of Adlington and is capable of accommodating approximately 500 dwellings. The release of Green Belt land for housing is necessary in order to meet unmet and future housing needs in Central Lancashire. This comprises exceptional circumstances. The site is highly sustainable.	This site was previously suggested to the Council but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						need for homes within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.		
A18.6	Rep'r Org. Agent	Mr Terry Cooper Private Individual Soulla Rose	Policy Site	Omission Sites (Chorley)	Promoting land at Toy Farm, Euxton for release from the Green Belt for residential development. The land has the potential to deliver 600 homes. The site is available, suitable, achievable and therefore deliverable. It will make an important contribution to meeting the future housing needs of Chorley. It should be allocated or at the very least safeguarded for future housing development. It is a sustainable location and in accordance with the spatial strategy. There are no known high level material constraints preventing the land being brought forward and it is within single ownership. A Development Statement has been submitted alongside the representation.	This site was previously suggested to the Council (various site suggestions received for different parts of the site) but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for housing within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes
A25.4	Rep'r Org. Agent	Mr Lee Bootle Private Individual Ms Hope Bleasdale	Policy Site	Omission Sites (Chorley) W. Blackburn Rd,	This site offers an opportunity to bring forward a deliverable site early in the plan period that will support the holistic growth of Chorley to support the adjacent mixed use and residential allocations (HS2.11 and EC5.5). The plan does not provide for the number of homes required across Central Lancashire and particularly in Chorley. The site is not considered inappropriate	This site is located in the Green Belt. It has not previously been suggested to the Council. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			development in the Green Belt following the introduction of grey belt. There are no environmental or technical constraints that would prevent development of the site. The site is in a sustainable location.	need for homes within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.		
A31.11	Rep'r: Mrs Emily Armstrong Org.: F1 Real Estate Management Agent: Mr John Francis	Policy: Omission Sites (Chorley) Site: SHELAA 19C409	There is necessity for a new policy to deal with need for a major strategic employment allocation along the M65 to meet the need for a logistic facility there.	This site was previously suggested to the Council but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment growth. As the Councils can meet their need for employment within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes
A32.10	Rep'r: Mr Stephen Glenn Org.: Northern Trust Land Ltd Agent: Mr Alexis De Pol	Policy: Omission Sites (Chorley) Site: Off Shelley Drive,	The proposed allocations in Eccleston will extinguish the current safeguarded land designations and the Green Belt boundaries are so tightly drawn around the remaining urban area that further development opportunities will be significantly limited without a review of Green Belt boundaries. It is considered more appropriate to review Green Belt boundaries around Eccleston to ensure adequate opportunities for growth	This site is located in the Green Belt. It has not been previously suggested to the Council. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for housing within existing	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			within this settlement over the plan period and beyond rather than directing Chorley's housing need elsewhere within Central Lancashire. This site is adjacent to the settlement boundary, is close to shops, services and public transport links and has no insurmountable constraints.	settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.		
A32.11	Rep'r Mr Stephen Glenn Org. Northern Trust Land Ltd Agent Mr Alexis De Pol	Policy Omission Sites (Chorley) Site SHELAA 19C110	The proposed allocations in Eccleston will extinguish the current safeguarded land designations and the Green Belt boundaries are so tightly drawn around the remaining urban area that further development opportunities will be significantly limited without a review of Green Belt boundaries. It is considered more appropriate to review Green Belt boundaries around Eccleston to ensure adequate opportunities for growth within this settlement over the plan period and beyond rather than directing Chorley's housing need elsewhere within Central Lancashire. This site is adjacent to the settlement boundary, is close to shops, services and public transport links and has no insurmountable constraints.	This site was previously suggested to the Council but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for housing within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes
A32.12	Rep'r Mr Stephen Glenn Org. Northern Trust Land Ltd Agent Mr Alexis De Pol	Policy Omission Sites (Chorley) Site SHELAA 19C022	The proposed allocations in Eccleston will extinguish the current safeguarded land designations and the Green Belt boundaries are so tightly drawn around the remaining urban area that further development opportunities will be significantly limited without a review of Green Belt boundaries. It is considered more appropriate to review Green Belt boundaries around Eccleston to ensure adequate opportunities for growth	This site was previously suggested to the Council but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			within this settlement over the plan period and beyond rather than directing Chorley's housing need elsewhere within Central Lancashire. This site is adjacent to the settlement boundary, is close to shops, services and public transport links and has no insurmountable constraints.	need for housing within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.		
A32.13	Rep'r Mr Stephen Glenn Org. Northern Trust Land Ltd Agent Mr Alexis De Pol	Policy Omission Sites (Chorley) Site Out Lane, Croston	Concerns as to whether the proposed allocation at Out Lane can be delivered in its current form. There are access constraints affecting this site which could be suitably addressed by extending the allocation to include the allocation of adjacent land to the south of Moor Road.	The site at Out Lane, Croston was proposed for allocation at preferred options but was subsequently discounted due to highways access issues. This adjacent site is located in the Green Belt. It has not been previously suggested to the Council. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for housing within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes
A35	Rep'r Mr J Charnley Org. Private Individual Agent Mr Robert Rawlins	Policy Omission Sites (Chorley) Site SHELAA 19C077	The Plan fails to allocate sufficient land to meet minimum requirements for housing. The site is in a sustainable location and its characteristics support allocation for residential development.	This site was previously suggested to the Council but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for homes within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.		
A45.13	Rep'r	Taylor Wimpey UK Limited	Policy	Omission Sites (Chorley)	Taylor Wimpey are promoting this site. It is expected it can deliver 750-800 new homes. The site is suitable and sustainable. We consider the site meets the tests of grey belt.	This site was previously suggested to the Council but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for homes within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes
	Org.	Taylor Wimpey UK Limited	Site	SHELAA 19C078				
	Agent	Megan Wilson						
A60.18	Rep'r	Ms Ashleigh Genco	Policy	Omission Sites (Chorley)	The site provides a very limited/no contribution to the purposes of including land in the Green Belt. It should therefore be allocated for development.	This site was previously suggested to the Council but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing	No	Yes
	Org.	Story Homes	Site	SHELAA 19C123				
	Agent	Mr Dan Mitchell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
				transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for homes within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.		
A60.23	Rep'r Ms Ashleigh Genco Org. Story Homes Agent Mr Dan Mitchell	Policy Omission Sites (Chorley) Site SHELAA 19C126	The site provides a very limited/no contribution to the purposes of including land in the Green Belt. It should therefore be allocated for development.	This site was previously suggested to the Council but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for homes within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes
A60.24	Rep'r Ms Ashleigh Genco Org. Story Homes Agent Mr Dan Mitchell	Policy Omission Sites (Chorley) Site SHELAA 19C394a	Story Homes objects to the Regulation 19 Local Plan which has deleted the allocation of this site since the preferred options stage. This change is unsound. It has been through a rigorous site selection process and should be reinstated. It represents an important site for allocation. It is a large brownfield	This site was previously suggested to the Council. It is located in the Green Belt and is previously developed. In accordance with the SHELAA the site was assessed as it is previously developed. The site was subsequently not selected for allocation as Green Belt release was not required to meet the	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					site.	housing need. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for housing within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.		
A65.13	Rep'r Org. Agent	Bloor Homes Limited Bloor Homes Limited Mr Harry Russell	Policy Site	Omission Sites (Chorley)	The Council needs to identify a significant number of additional developable sites as there is a shortfall in supply. Sites in the Green Belt should be allocated. This site can accommodate 200 dwellings, is deliverable and there are no constraints that would preclude it coming forward. A vision document has been prepared alongside the representation. The site forms a logical and well contained extension to Coppull and is located in walking distance to services and facilities. It is in single ownership and can be brought forward at the earliest opportunity. It is considered to meet the definition of grey belt.	This site was previously suggested to the Council but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for housing within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A70.7	Rep'r	Mr Farrington	Policy	Omission Sites (Chorley)	The allocation of employment sites needs to be reconsidered.	This site was previously suggested to the Council but was not considered for allocation as it is a greenfield site in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment growth. As the Councils can meet their need for employment within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes
	Org.	Trustees of the Worden Estate	Site	SHELAA 19C073 -				
	Agent	Mr Andy McMullan						
A73	Rep'r	Mr Glenn Stafford	Policy	Omission Sites (Chorley)	The plan does not allocate sufficient land for employment purposes. Further allocations are needed. The current Green Belt policy may permit employment development at this site as we consider the site to be grey belt. The site has no significant insurmountable constraints. It is considered a logical urban extension.	This site is located in the Green Belt. It has not previously been suggested to the Council. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment growth. As the Councils can meet their need for employment within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes
	Org.	Private Individual	Site	West of Wigan Rd,				
	Agent	Mr Robert Rawlins						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B60	Rep'r	Mr Craig Blatchford (Planner Montagu Evans)	Policy	Omission Sites (Chorley)	The distribution of housing across the area is skewed by the existing Green Belt designations in Chorley and does not fully reflect the spread of housing need. Nearly 30% of allocations in Chorley are on sites where a wintering bird survey is required therefore there is a material doubt whether any or all of these sites will come forward. Given this uncertainty additional housing sites should be included. The land at Lower Simpson Fold is proposed, it can accommodate around 75 dwellings which would make a significant contribution to mitigating the shortfall.	The site is in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Councils can meet their need for homes within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	No
	Org.	Private Individual	Site	No location plan				
	Agent							
C3.2	Rep'r	The Talbot Estate	Policy	Omission Sites (Chorley)	In accordance with Policy SS1, two parcels of land in Chorley should be considered for housing as they are within the settlement boundary.	These two parcels of land have never been suggested to the Council before. There have been four call for sites exercises throughout the Local Plan process which have allowed for sites to be put forward for consideration. They have therefore not been assessed through the SHELAA. The sites are located in the settlement of Chorley which is in Tier 2 of the settlement hierarchy and is the secondary focus for development. Housing development on these sites is therefore acceptable in principle, but there would need to be an assessment of the sites and any possible constraints. This could be done through the development management process. The sites do not need to be allocated in order to come forward for development.	No	Yes
	Org.	The Talbot Estate	Site	Land adjacent to				
	Agent	Mrs Claire Wilkinso						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Omission Sites (Preston)				Count of Representations against this policy/section: 15		
A12.3	Rep'r Tallentine Org. Tallentine Agent Mr Jonathan Ainley	Policy Omission Sites (Preston) Site Omission Site	Site 4 – Land off Blackpool Road This site is vacant land, located to the west of Preston and as such it could form part of the logical extension of the urban area which is extending in this direction. To the south of the site is the River Ribble, with Blackpool Road (A583) to the north and the junction to the new EWLR. The site is therefore well connected and in close proximity to the draft allocation set out in Emerging Policy SS5. The site currently comprises mostly vacant marshland, and arable farmland, with a new roadside/service station situated to the north west. The site is allocated partially as a Biological Heritage Site in the emerging CLLP, however Tallentine believe it should be considered as a future development site and potentially form part of Preston West.	The representation doesn't state the proposed use for the land. The site in this representation has not been submitted at any of the 4 call for sites stages and therefore has not been subject to any detailed assessments required to ascertain if the site is available, deliverable and achievable. The site submission notes part of the site is covered by a BHS which would be contrary to Policies EN5 to EN9, it is also notes the land is arable farmland which would be contrary to Policy EN16 The Plan allocates sufficient land for employment and housing growth.	No	Yes
A14.2	Rep'r P Wild and C & V Kerr Org. Private Individual Agent Mr Graham Love	Policy Omission Sites (Preston) Site Omission Site	Joint omission site: Land east and west of Dixons Lane, Grimsargh and Land to the rear of 203 Preston Road, Grimsargh. The draft Plan evidence base (SHELAA ref. 19P292) assessed the land east and west of Dixons Lane, Grimsargh as being available, suitable and achievable for housing development and was proposed to be allocated in the Preferred Options draft Plan as Site Allocation PC/HS1.38 with capacity for up to 196 no. dwellings.	Part of site (19P292) was assessed through the SHELAA process and ultimately discounted due to the Spatial Strategy, as the sites lie in an Area of Separation and within the Open Countryside. In line with NPPF paragraph 110, 115, and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)				Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						The adjoining land to the rear of 203 Preston Road, Grimsargh, was submitted at Call for Sites 4 but, potentially, was not considered by the joint authorities as no acknowledgement was received. The land to the rear of 203 Preston Road, Grimsargh has capacity to accommodate approximately 20 no. dwellings, but also provides an improved means of highway access to the land east and west of Dixons Lane, Grimsargh directly from Preston Road (B6243) and provides a further pedestrian and cycling connection to the centre of the village and location of the proposed new convenience store. The response states housing allocations have been made in tier 5 settlements, when Grimsargh is a tier 4 settlement and therefore on that basis it cannot be said Grimsargh is not a suitable and sustainable location for growth and that no housing allocations are proposed at Grimsargh because they would not be in accordance with the spatial strategy. Therefore the reason for discounting the site is not sound.	infrastructure. The Plan allocates sufficient land for employment and housing growth.		
A15.2	Rep'r	AAB Developments Ltd and Lester Developments Ltd	Policy	Omission Sites (Preston)	Site suggestion of land south of Broughton Park, Whittingham Lane, Broughton The site has a current planning application ref 06/2025/0343. The site also had a previous planning application 06/2018/0732 which was resolved for	This is a new site suggestion which has not previously been submitted through the Local Plan process, through any of the 4 call for sites, and therefore has not been subject to any detailed assessments required to ascertain if the site is available, deliverable and achievable. The Council note that there	No	Yes
	Org.	AAB Developments Ltd and Lester Developments Ltd	Site	Omission Site				

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
	Agent Mr Graham Love		approval in accordance with an officer recommendation to grant permission subject to a s106 agreement, at the 10th January 2019 meeting of the Preston City Council Planning Committee. The response states housing allocations have been made in tier 5 settlements, when Broughton is a tier 4 settlement and therefore on that basis it cannot be said Broughton is not a suitable and sustainable location for growth and that no housing allocations are proposed at Broughton because they would not be in accordance with the spatial strategy. The Illustrative Layout Plan shows a scheme of up to 100 no. dwellings (net developable area of 3.6 hectares which is 60% of gross site area), and a mix of detached, semi-detached and terraced dwellings to provide market sale and affordable housing tenures. The undeveloped 40% western part of the site will provide landscaping and amenity public open space. This area will also provide space for on-site biodiversity net gain habitat creation, including SuDS balancing ponds, swales and wildflower meadows and will achieve 12.23% in habitat units, 31.11% in hedgerow units and 43.36% in watercourse units. Full biodiversity net gain will be achieved on-site and no off-site provision is necessary. The public open space area will also accommodate acoustic earth mounding and/or an	is a current planning application on the site, the council have allocated sites with planning permission that will not be built out before the plan is adopted, not sites for which an application decision is pending. The site is therefore assessed through the Development Management process as to its suitability for a residential site.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					acoustic barrier alongside the M6 motorway. The site adjoins the settlement boundary of Broughton and is a sustainable location which is accessible to a range of local services and facilities for day to day needs.			
A17.5	Rep'r	Persimmon Homes and Charles Church Lancashire	Policy	Omission Sites (Preston)	Omission site: Land at Bartle, Preston The site is located in Bartle, and has a site area of approximately 6.4ha. The site comprises of a single field used as pastoral farmland. The perimeter of the site is defined by mature trees and hedgerows. The site is bound by Blackleach Lane to the south and west. Fields surround the site to the north and east. Vehicular access to the site can be achieved from Blackleach Lane. An ordinary watercourse is located towards the north of the site. The representation states the site is not in the Green Belt and developing the site for residential development would not lead to the unrestricted sprawl of large built-up areas, nor would it make a significant contribution to encroaching on the countryside. Representation states the site was discounted at Stage 2 of the SHLAA with the reasoning for discounting being that the "Site does not accord with Spatial	The site (19P323) was assessed through the SHELAA process and ultimately discounted due to the Spatial Strategy. In line with NPPF paragraph 110, 115, and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment and housing growth.	No	Yes
	Org.	Persimmon Homes and Charles Church Lancashire	Site	Omission Site				
	Agent	Stephen Harris						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Strategy - site within OC". Given that the site is immediately adjacent to SS3 and therefore would be an extension to Preston, they consider that the reason for discounting is not justified. The SHLAA does assess PCC001 (19P025) which has an outline permission (06/2020/0888) for 1100 units. Edith Rigby was used as the dividing line for open countryside and the proposed expansion of the urban area for Preston. As a result the omission site was outside this area and has not been taken forward. The site is however adjacent to Bartle Garden Village which has an extant consent. The result of this is that the SS3 Strategic Site Allocation goes beyond Edith Rigby Way and the next logical hard boundary is Blackleach Lane. It is considered that the site is capable of accommodating approximately 120 dwellings as either a site specific allocation or for inclusion into SS3.			
A26.5	Rep'r Miss Georgina Cox Org. Gladman Developments Agent	Policy Omission Sites (Preston) Site Omission Site	Omitted sites: 1: Land East of Garstang Road, Broughton The site was a draft allocation in the Central Lancashire preferred options plan (Allocation ref: PC/HS1.5). The site provides suitable land to contribute to the overall spatial strategy for growth as acknowledged in the CLLP preferred options draft plan. The site's proposed allocation was for 110 dwellings which	The sites were assessed through the SHELAA process and ultimately discounted due to the Spatial Strategy and Area of Separation policies. In line with NPPF paragraph 110, 115 and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			reflects its clear credentials for future development; the site is in an entirely suitable and sustainable location to accommodate growth. Gladman state that the site is suitable, available, and deliverable. 2. Land off Churchgate, Goosnargh (19P008) The site is proposed for up to 145 dwellings and is stated to be an entirely suitable and sustainable location to accommodate growth. The site is in an edge of settlement location and is not subject to any insurmountable technical or environmental constraints. The site is considered to be a logical extension west of the settlement and sits south of the approved scheme (Ref: 06/2018/1356) by Emery Planning for up to 26 dwellings which is now being built out. There were no technical constraints on the site identified by the Council through the submission of the previous planning application. Furthermore, the case officer concluded that the proposed development can be considered sustainable in terms of its accessibility.	infrastructure. The Plan allocates sufficient land for employment and housing growth.		
A33	Rep'r: Moto Hospitality Limited Org.: Moto Hospitality Limited Agent: Mrs Louise Leyland	Policy: Omission Sites (Preston) Site: Omission Site	Representation promotes 6.8ha omission site at land adjacent to M55 Junction 2 for allocation for a motorway service station, which Moto considers there is a need for in this location. Reference is made to the 'Strategic road network and the delivery of sustainable development' government circular (December 2022), the spacing requirements criteria of paragraph 81 within the circular and	The site is outside the Spatial Strategy criteria of Policy SS1: Development Patterns and Policy SS2 Settlement Hierarchy. There is currently no identified need for a Motorway Service Station in this location. National Highways have requested further information in respect of App Ref: 06/2024/1253 so it is not yet clear	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					drive time between existing motorway services.	whether the site is suitable or needed for a motorway service area in respect of highway issues.		
A44.1	Rep'r	Mr Jack Pikington	Policy	Omission Sites (Preston)	Omitted site: Land to the east of Garstang Road, Bilsborrow The site is located to the east of Garstang Road (A6) and immediately to the south of the settlement of Bilsborrow, Preston. The site is made up of agricultural land, constituting three individual fields in total. The site area covers approximately 6.88 hectares, of which 3.07ha would be occupied by the proposed residential development. The site was subject to two recent applications for residential (06/2020/1087 and 06/2019/1244), which sought permission for 100 and 105 homes respectively. Both of which were refused. The site is allocated in the draft plan as Open Countryside and within an Area of Separation. As such draft policies EN17 and EN18 apply. A transport statement, illustrative masterplan and Landscape and Visual Appraisal have been submitted.	The site (19P053) was assessed through the SHELAA process and ultimately discounted due to the Spatial Strategy and Area of Separation policies. In line with NPPF paragraph 110, 115 and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment and housing growth.	No	Yes
	Org.	Seddon Homes	Site	Omission Site				
	Agent	Mr Josh Hellawell						
A52.1	Rep'r	Mr Gerald Gornall	Policy	Omission Sites (Preston)	Omitted site: Land at Bushells Farm, Goosnargh, Preston The site has the potential to deliver around 140 new homes. No	Part of the site (19P060) with a slightly different boundary was assessed through the SHELAA process and ultimately discounted due to the Spatial Strategy.	No	Yes
	Org.	Private Individual	Site	Omission Site				
	Agent	Mr Daniel Hughes						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			environmental or technical issues have been identified (which was confirmed in the recent appeal) which would preclude residential use. The site is stated to be suitable, available and deliverable. The following applications relate to the site itself: 06/2018/0884 Outline planning application for up to 140no. dwellings with all matters reserved except for access. Refused. Appeal, ref APP/N2345/W/20/3258912, Dismissed 3rd February 2022. 06/2020/1141 Outline planning application for up to 140no. dwellings with all matters reserved except for access. Refused. The previous appeal decision identified a substantial number of positive attributes which provide a strong basis for reconsidering the site's status particularly in light of Central Lancashire's housing delivery challenges and the preparation of a new Local Plan.	In line with NPPF paragraph 110, 115 and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment and housing growth.		
A53.1	Rep'r Northern Trust Org. Northern Trust Agent Mr Daniel Hughes	Policy Omission Sites (Preston) Site Omission Site -	3 Omitted sites: Site A: Land South of Walker Lane The site is currently vacant grassland, with a number of trees and is adjacent the existing woodland. The site is approximately 2ha in size and is could deliver approximately 11 houses based on the constraints of the site. The site is described as suitable, available and deliverable, and would comprise an appropriate housing allocation for self/custom built homes.	The sites in this representation have not been submitted at any of the 4 call for sites stages for housing and therefore has not been subject to any detailed assessments required to ascertain if the site is available, deliverable and achievable. Site C was a SHELAA site 19P034 suggested for amenity and greenspace and therefore not taken forward through the SHELAA process. The Plan allocates sufficient land for	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Site B: Land to the north of Walker Lane The site was identified for open space within the original planning consent, on land adjoining Parcel H of the development. It is approximately 0.8ha in size and could deliver circa 20no. dwellings. No environmental or technical issues have been identified which would preclude residential use. The site is described as suitable, available and deliverable. Site C: Land to the east of Walker Lane The site is approximately 8ha in size and could deliver circa 200no. dwellings. No environmental or technical issues have been identified which would preclude residential use. The site is described as suitable, available and deliverable. The site has an extant planning permission for a training ground, which demonstrated that technical issues are limited, and a major development can be accommodated on the surrounding road network.	housing growth.		
A54.1	Rep'r Northern Trust Org. Northern Trust Agent Mr Daniel Hughes	Policy Omission Sites (Preston) Site Omission Site	Omitted site: Land North of Dodney Drive The site is approximately 5.5ha in size and is thought to be able to deliver approximately 150no. houses based on the constraints of the site. No environmental or technical issues have been identified which would preclude residential use. The site is described as suitable, available and deliverable.	The site (19P066) was assessed through the SHELAA process and discounted as the site is entirely in Flood Zone 3b.	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A56.4	Rep'r	Reaper Limited and Hulton Land Ltd	Policy	Omission Sites (Preston)	Omitted Site: Land off Longridge Road, Grimsargh The site is 11.39ha greenfield land, that is used for grazing purposes. The site is bounded by residential development to the north and south, with the former railway line dissecting the site to the west. The site has had 2 historic residential planning appeals, both of which were dismissed. The site is proposed for residential development with associated public open space including junior football pitch, and a Biodiversity Net Gain Habitat Bank. The site is designated as an AoS on the Policies Map, which the representor objects to (dealt with at A56.1)	The site in this representation has not been submitted at any of the 4 call for sites stages and therefore has not been subject to any detailed assessments required to ascertain if the site is available, deliverable and achievable. The site submission notes that the site is covered Area of Separation and therefore would be contrary to Policy EN18. The Plan allocates sufficient land for employment and housing growth.	No	Yes
	Org.	Reaper Limited and Hulton Land Ltd	Site					
	Agent	Mr Matthew Symo						
A60.19	Rep'r	Ms Ashleigh Genco	Policy	Omission Sites (Preston)	Multiple omitted sites: Land at Jepps Lane, Barton (19P062) The representation states no environmental or technical issues have been identified which would preclude residential use. The site is described as suitable, available and deliverable. The	The sites were assessed through the SHELAA process and ultimately discounted due to the Spatial Strategy and in the case of Barton and Grimsargh, the Area of Separation policy too. In line with NPPF paragraph 110, 115	No	Yes
	Org.	Story Homes	Site	Omission Site				
	Agent	Mr Dan Mitchell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			site could be developed to provide in between 200 and 225 new dwellings alongside improved pedestrian cycle links and public open space. Helms farm, Broughton (19P071) Land at Helms Farm is stated to perform exceptionally well in terms of its sustainability credentials and Story Homes has promoted the site for both housing and specialist housing, a specific sector not catered for anywhere else via allocations. Story Homes has raised concerns about the blanket approach the Council has used to discount sites as part of the site selection process. In the case of Helms Farm, Broughton, the Council has incorrectly dismissed a part brownfield site, as lying entirely in the open countryside and within a top tier settlement. The Council also dismissed the site from further assessment on the basis that it falls within a new Area of Separation that it is now proposing. The Councils' approach is therefore plainly flawed. Longridge road, Grimsargh (19P117) The Site lies on the eastern edge of Preston, the Tier 1 settlement. It is located adjacent to a major employment and services area with existing residential development to the northern and western boundary. Story Homes considers that the Council has failed to undertake a robust site selection assessment of the omission site.	and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment and housing growth.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A68.3	Rep'r	Wain Homes North West	Policy	Omission Sites (Preston)	Omission site: Land at Whittingham Lane/ James Towers Way, Broughton Representation states that the Broughton Bypass (James Towers Way) represents a strong physical barrier and that their site represents a logical infill opportunity. The site is within Wain Homes control, and they have a proven track record in the delivery of new homes, including at Keyfold Farm for 129 no. houses currently under construction in Broughton. The site could be brought forward quickly to make a meaningful contribution to housing land supply in the short-term, and accommodate circa 150 new dwellings, a care home, land for a new village hall and community building, and land for primary school expansion. Broughton is a thriving settlement and benefits from a range of amenities. The representor has liaised with the Parish Council in relation to the draft Broughton Neighbourhood Plan. The Regulation 14BNP (2025) included a Masterplan for our client's site and this Masterplan had already been subject to extensive engagement with the parish council and also consultation with the community prior to the Regulation 14 BNP being published.	Part of site (19P056) was assessed through the SHELAA process and ultimately discounted due to the Spatial Strategy and Area of Separation policies. The site in this representation is an amended boundary from 19P056 and has not been submitted at any of the 4 call for sites stages. In line with NPPF paragraph 110, 115 and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment and housing growth.	No	Yes
	Org.	Wain Homes North West	Site	Omitted Site Land at				
	Agent	Stephen Harris						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
B65.4	Rep'r	Messrs Rankin, Patel and Briggs	Policy	Omission Sites (Preston)	Omitted site: Land to the east of Preston Road, Grimsargh The representation site lies to the east side of Preston Road and abuts the southern boundary of the built-up settlement of Grimsargh. The site is approx. 22.75ha of land designated within the Open Countryside (EN1) and an Area of Separation (Policy EN4), but through considered assessment, it is contended that the site represents the most suitable and appropriate location for new development within the settlement and will continue to meet the housing needs of the area. The site is located in what is considered to be one of the most sustainable locations for new development in the Borough with enough supporting services and facilities to accommodate new residential development and support introducing families into the existing neighbourhood.	Several sites (19P022, 19P294 and 19P284) with different boundaries were assessed through the SHELAA process and ultimately discounted due to the Spatial Strategy and Area of Separation policy. In line with NPPF paragraph 110, 115 and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment and housing growth.	No	Yes
	Org.	Private Individual	Site	Omission Site				
	Agent							
D04.07	Rep'r	Laura Marchant	Policy	Omission Sites (Preston)	Omitted site: Bleasdale Road near Whittingham The site is in Homes England Ownership and is 2.75ha in size which could accommodate 80 dwellings. Homes England propose that Bleasdale Road should be allocated within this	The site (19P037) was assessed through the SHELAA process and ultimately discounted due to the Spatial Strategy and Area of Separation policies. In line with NPPF paragraph 110, 115 and 125 the CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most	No	Yes
	Org.	Homes England	Site	Omission Site				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Local Plan for specialist housing. The Site is: • Suitable: The Site is in an existing residential area and is considered suitable for residential development. • Available: The Site is within one single land ownership (Homes England) • Achievable: The Site can be delivered within Years 9 – 11 of the Plan period.	accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment and housing growth.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Omision Sites (South Ribble)						Count of Representations against this policy/section:		22
A07.01	Rep'r	Mr George Green	Policy	Omision Sites (South Ribble)	The Plan fails to allocate sufficient land to meet minimum requirements for housing and employment land. The site is in a sustainable location and its characteristics support inclusion within the settlement boundary.	The site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment and housing growth. As the Authorities can meet their need for homes and commercial development within existing settlements, and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.	No	Yes
	Org.	Private Individual	Site	SHELAA 19S111 (Land				
	Agent	Mr Robert Rawlins						
A09	Rep'r	Fr. Joseph Bibby	Policy	Omision Sites (South Ribble)	Land at Leyland St Mary's RC Church should not be designated as Green Infrastructure. The land should be allocated for residential development purposes albeit the southern portion can remain as Green Infrastructure to maintain connectivity with the other sites along the watercourse.	The Plan allocates sufficient land for housing and employment growth. It is therefore unnecessary to review the area's existing provision of Green Infrastructure.	No	Yes
	Org.	St Mary's RC Church	Site	SHELAA 19S362 - Land				
	Agent	Mr Peter Gilkes						
A12.2	Rep'r	Tallentine	Policy	Omision Sites (South Ribble)	The Plan fails to allocate sufficient land to meet minimum requirements for housing and employment growth and it is considered additional land should be allocated for residential and commercial development. The sites are in a sustainable location with few constraints and should therefore be allocated for development.	One of the sites lies in the Green Belt and the other is a green infrastructure site. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing and	No	Yes
	Org.	Tallentine	Site	SHELAA 19S108 (Bank				
	Agent	Mr Jonathan Ainley						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						employment growth. As the Authorities can meet their need for homes and commercial development within existing settlements and on other land outside the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt and green infrastructure sites are not considered for allocation.		
A12.4	Rep'r Org. Agent	Tallentine Tallentine Mr Jonathan Ainley	Policy Site	Omision Sites (South Ribble) SHELAA 19S105	The site lies in a sustainable location and is previously developed land in the Green Belt. It could be considered to be grey belt and should be considered for allocation.	The site is wholly within Flood Zone 3 and Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing and employment growth. As the Authorities can meet their need for homes and commercial development within existing settlements, and on other land outside the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.	No	Yes
A20	Rep'r Org. Agent	Mr George Green Private Individual Mr Robert Rawlins	Policy Site	Omision Sites (South Ribble) SHELAA 19S101 (Land	The Plan fails to allocate sufficient land to meet minimum requirements for housing and employment land. The site is in a sustainable location and its characteristics support inclusion within the settlement boundary.	The site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						employment and housing growth. As the Authorities can meet their need for homes and commercial development within existing settlements, and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.		
A22	Rep'r Org. Agent	Mr David Ashton Private Individual Mr Robert Rawlins	Policy Site	Omision Sites (South Ribble) SHELAA 19S001	The Plan fails to allocate sufficient land to meet minimum requirements for housing. The site is in a sustainable location and its characteristics support allocation for residential development.	The site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Authorities can meet their need for homes within existing settlements, and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.	No	Yes
A34	Rep'r Org. Agent	Mr J Charnley Private Individual Mr Robert Rawlins	Policy Site	Omision Sites (South Ribble) SHELAA 19S075	The Plan fails to allocate sufficient land to meet minimum requirements for housing. The site is in a sustainable location and its characteristics support allocation for residential development.	The site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Authorities can meet their need for homes within existing settlements, and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						sites are not considered for allocation.		
A36.2	Rep'r	Mr Neil Lucas	Policy	Omision Sites (South Ribble)	The CLLP does not robustly seek to meet the area's employment needs. The approach fails to take account of the true scale of employment demand and the need for realistic employment land supply, both now and including the National Cyber Force. The CLLP should address this shortfall in employment land through an employment led strategic site allocation at Cuerdale. Although the land is in the Green Belt, the only contribution the proposed Strategic Site makes to the purposes of the Green Belt is in relation to safeguarding the countryside from encroachment. Therefore, the site's strategic importance to regional economic growth and lack of impact on the Green Belt justify the inclusion of a Strategic Site allocation at Cuerdale.	It is considered that the CLA's evidence is robust. The Logik site is located in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment growth. As the Councils can meet their need for employment within existing settlements and in other locations outside of the Green Belt there is no requirement for Green Belt boundaries to be reviewed. As such, exceptional circumstances for Green Belt release cannot be demonstrated.	No	Yes
	Org.	Logik Strategic Land	Site	Cuerdale (non SHELAA)				
	Agent	Mr Neil Lucas						
A37.4	Rep'r	Mr Andrew Dewhurst	Policy	Omision Sites (South Ribble)	Maple Grove Developments are concerned with the lack of economic growth ambition identified through the CLLP Publication consultation document which does not align with the wider aspirations across Lancashire. There is a significant shortfall of employment land supply identified in policies EC1-6 and ultimately potential employment site allocations, which would support the economic growth strategy in a sustainable and suitable manner	The site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment growth. As the Authorities can meet their need for commercial development within existing settlements and in other locations outside of the Green Belt, there is no requirement for	No	Yes
	Org.	Maple Grove Developments Ltd	Site	19S119				
	Agent	Mr Justin Cove						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			(including Land at Lodge Lane, Flensburg Way and Penwortham Way, PR26 6PH), have been excluded due to their current Green Belt status, despite no comprehensive Green Belt review having been undertaken. Ultimately, the Council has placed greater importance on avoiding Green Belt release than meeting recognised employment land needs and directing development to the most sustainable locations. Land at Flensburg Way is a suitable, sustainable and deliverable site for employment uses promoted by Maple Grove Developments, who have an excellent track record of delivering employment led schemes across Central Lancashire and the North West. The Site should be allocated through the CLLP to meet identified employment land requirements.	Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.		
A43.2	Rep'r PJM Property Investment Limited Org. PJM Property Investment Limited Agent Mr Andrew Taylors	Policy Omision Sites (South Ribble) Site 19S054	The Plan fails to allocate sufficient land to meet minimum requirements for housing. The site is in a sustainable location and its characteristics support allocation for residential development.	The site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Authorities can meet their need for homes within existing settlements and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						sites are not considered for allocation.		
A51.1	Rep'r	Mr Eric Derbyshire	Policy	Omision Sites (South Ribble)	The Plan fails to allocate sufficient land to meet minimum requirements for housing. The site is in a sustainable location and its characteristics support allocation for residential development.	The site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Authorities can meet their need for homes within existing settlements and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.	No	Yes
	Org.	Private Individual	Site	19S155				
	Agent	Mr Daniel Hughes						
A58.1	Rep'r	Reaper Limited and Hulton Land Ltd	Policy	Omision Sites (South Ribble)	The land should not be designated as Green Infrastructure (GI) but should be allocated for residential development.	The Plan allocates sufficient land for housing and employment growth. It is therefore unnecessary to review the area's existing provision of Green Infrastructure.	No	Yes
	Org.	Reaper Limited and Hulton Land Ltd	Site	SHELAA 19S062 (Land				
	Agent	Mr Matthew Symo						
A60.20	Rep'r	Ms Ashleigh Genco	Policy	Omision Sites (South Ribble)	The CLLP does not robustly seek to meet the area's housing and employment needs. The Plan is unsound as it fails to account for development needs across the plan period and beyond. The Plan is at odds with Framework growth ambitions and local growth initiatives. The CLLP relies on an evidence base that does not properly consider the need for employment land whilst failing to take account of a substantial investment	The Cuerdale Garden Village site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing and employment growth. As the Authorities can meet their need for homes within existing settlements and on other land	No	Yes
	Org.	Story Homes	Site	SHELAA 19S107 &				
	Agent	Mr Dan Mitchell						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			project, the NCF. The Plan also provides and overestimation of housing land supply and does not positively address housing need. No other single area benefits from the locational attributes of CGV, reflected in its relationship with the Samlesbury Enterprise Zone and the NCF, its situation at Junction 31 of the M6 and its accessibility to Preston and Blackburn. The land is considered to be grey belt. Development within the site would result in localised impact on the Green Belt and would not fundamentally undermine the purposes of the remaining Green Belt within the Plan area. The CLLP should address shortfalls in housing and employment land through a strategic site allocation at Cuerdale or alternatively through a strategic reserve policy. The site's strategic importance to regional economic growth and lack of impact on the Green Belt justify the inclusion of a Strategic Site allocation at Cuerdale.	outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.		
A64.4	Rep'r Mr Matthew Banks Org. Private Individual Agent Mr Luke Banks	Policy Omision Sites (South Ribble) Site	Allocating land off Hugh Barn Lane aligns with the objectives of the Plan by providing sustainable housing growth within a rural community, utilising land that can be integrated with existing infrastructure. Allocating land off Hugh Barn Lane, New Longton, aligns with national and local planning objectives, offering a sustainable, deliverable solution to meet	The site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Authorities can meet their need for homes within existing settlements and in other locations outside of the Green Belt there	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
					housing needs in a rural community. The current omission of this site raises concerns regarding the Plan's legal compliance and soundness. We respectfully request the Plan be modified to include this site, ensuring a justified and effective strategy for sustainable development.	is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.		
A70.2	Rep'r	Mr Farrington	Policy	Omision Sites (South Ribble)	The Plan fails to allocate sufficient land for housing and employment growth, and it is considered additional land should be allocated for residential and commercial development. The sites are in a sustainable location with few constraints and should therefore be allocated for development.	The sites lie in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing and employment growth. As the Authorities can meet their need for homes and commercial development within existing settlements and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.	No	Yes
	Org.	Trustees of the Worden Estate	Site	SHELAA 19S085 - Land				
	Agent	Mr Andy McMullan						
A70.4	Rep'r	Mr Farrington	Policy	Omision Sites (South Ribble)	The Plan fails to allocate sufficient land for housing and employment growth, and it is considered additional land should be allocated for residential and commercial development. The site is in a sustainable location with few constraints and should therefore be allocated for development.	The sites lie in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing and employment growth. As the Authorities can meet their need for homes and commercial development within existing settlements and on other land outside of the Green Belt, there is	No	Yes
	Org.	Trustees of the Worden Estate	Site	SHELAA 19S096 (Land				
	Agent	Mr Andy McMullan						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.		
A70.5	Rep'r	Mr Farrington	Policy	Omision Sites (South Ribble)	The Plan fails to allocate sufficient land for housing and employment growth, and it is considered additional land should be allocated for residential and commercial development. The site is in a sustainable location with few constraints and should therefore be allocated for development.	The sites lie in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing and employment growth. As the Authorities can meet their need for homes and commercial development within existing settlements and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.	No	Yes
	Org.	Trustees of the Worden Estate	Site	SHELAA 19S102 (Land				
	Agent	Mr Andy McMullan						
A70.6	Rep'r	Mr Farrington	Policy	Omision Sites (South Ribble)	The Plan fails to allocate sufficient land for housing and employment growth, and it is considered additional land should be allocated for residential and commercial /leisure development.	The sites lie in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing and employment growth. As the Authorities can meet their need for homes and commercial development within existing settlements and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.	No	Yes
	Org.	Trustees of the Worden Estate	Site	SHELAA 19S092 - Land				
	Agent	Mr Andy McMullan						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A72	Rep'r	Mr George Green	Policy	Omision Sites (South Ribble)	Land south of Strylands (Hutton) is suitable for employment use (B8) or as a Solar Park. Insufficient land has been allocated to meet employment needs. The plan does not allocate areas for renewable and low carbon energy sources necessitated by NPPF para 165b.	The site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for employment growth. As the Authorities can meet their need for commercial development within existing settlements and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation. Collectively, the CLLP's climate change policies (CC1, CC2 + CC3) are a robust response to the climate emergency. Allocating sites exclusively for renewable energy generation is therefore unnecessary.	No	Yes
	Org.	Private Individual	Site	19S078 / Land south				
	Agent	Mr Robert Rawlins						
B04	Rep'r	Mrs Jennifer Hall	Policy	Omision Sites (South Ribble)	Map 4 excludes site 74 Howick Hill Farm from the Green Belt and BHS and puts it in the settlement boundary which is unsuitable.	Howick Hall Farm (site 74) is not within the Green Belt. In the 2015 adopted Local Plan, the site is allocated as G4: Protected Open Land and G16: Biological Heritage Sites, and is within the settlement boundary . The site was previously allocated as Safeguarded Land in the 2000 Local Plan. The G4 protected open land designation is not being carried forward in the new Local Plan but the Biological Heritage	No	No
	Org.	Private Individual	Site	SHELAA 19S217 -				
	Agent							

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
						Site designation remains on the site. The site remains in the settlement boundary and no changes are being made to the Green Belt boundary. All of the inset map areas are showed greyed out on Map 4, the designation is shown on Map 4.2		
B70	Rep'r Org. Agent	Robert French Private Individual	Policy Site	Omision Sites (South Ribble) SHELAA 19S003 - Land	The Plan fails to allocate sufficient land to meet requirements for housing In Salmesbury which is becoming an employment hub. Lack of housing in Salmesbury, close to employment areas will result in a significant impact on climate change due to travel by private car and may result in loss of prime agricultural land to meet the shortfall in housing demand.	The site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth including a housing allocation close to Salmesbury at Mellor Brook. As the Authorities can meet their need for homes within existing settlements and on other land outside of the Green Belt, there is no requirement for Green Belt boundaries to be reviewed and therefore Green Belt sites are not considered for allocation.	No	Yes
D03.7	Rep'r Org. Agent	Helen Holland Blackburn with Darwen Borough Council	Policy Site	Omision Sites (South Ribble)	The Plan should not proceed to formal submission stage. Instead, in accordance with paragraph 148 of the NPPF, a detailed Green Belt review should be carried out to identify potential further housing and employment allocation sites, with priority given to previously developed land and grey belt locations which promote sustainable patterns of development. The result will be a revised Plan which is sound and robust in allocating sufficient land to meet	The site lies in the Green Belt. The CLLP supports a brownfield first, regeneration focused strategy, promoting development in the most accessible and sustainable locations with access to existing transport and infrastructure. The Plan allocates sufficient land for housing growth. As the Authorities can meet their need for homes within existing settlements and other locations outside of the Green Belt there is no requirement for Green Belt boundaries	No	Yes

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			objectively assessed housing and employment needs in full over the whole Plan period, thereby also maximising the economic potential of the Plan area at the same time. As part of this Green Belt review process, our representation shows that the subject land at Mellor Brook does not perform a strong role in respect of Green Belt purposes a), b) and d) as set out within paragraph 143 of the NPPF. The subject land therefore constitutes 'grey belt' as defined by the NPPF. In accordance with paragraph 145 of the NPPF, there are exceptional circumstances to justify release of the subject land from the Green Belt.	to be reviewed and therefore Green Belt sites are not considered for allocation.		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
Evidence						Count of Representations against this policy/section:		15
A01.03	Rep'r	Mr. Michael Linfoot	Policy	Evidence	Concern that the GTAA does not provide a robust evidence base to establish accommodation needs. Three main concerns relating to 1) the low need from gypsies and travellers in bricks and mortar housing, 2) the absence of evidence of need for net migration to the area and 3) the impact of the change in definition of gypsies and travellers introduced in PPTS December 2024. All of these may lead to an underestimation of need.	The GTAA was updated in December 2024 and provides an up to date and robust evidence base for the Local Plan. The need from gypsies and travellers living in bricks and mortar accommodation is based on the 2021 Census and the findings of national studies undertaken by the consultants. In-migration has been taken into consideration through the analysis of household survey data which identifies that zero households have moved into Central Lancashire and onto a pitch in the past 5 years. The change in definition of gypsies and travellers in the updated PPTS has been addressed in the GTAA.	No	Yes
	Org.	Private Individual	Site					
	Agent	Mr. Michael Hargre						
A17.4	Rep'r	Persimmon Homes and Charles Church Lancashire	Policy	Evidence	1. 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. 2. The Pragmatic Scenario has different assumptions compared to Worst Case Scenario: Construction costs - Lower quartile costs are adopted for all schemes rather than just for those schemes of 50+ units. Smaller schemes will not be completed	1. The rationale for presenting a "Pragmatic Scenario” is robust and explained in detail within the report. 2. The Pragmatic Scenario was accepted at the Wirrall EiP, which considers the current economic climate. It is not expected this would be the case across the whole plan period. Construction Costs - The ‘Pragmatic’ testing assumes that housebuilders would find ways to reduce build costs, such as MMC.	No	Yes
	Org.	Persimmon Homes and Charles Church Lancashire	Site					
	Agent	Stephen Harris						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			by national housebuilders and it is essential that higher construction costs in line with BCIS Median Costs are adopted. Profit - Reduced from 20% on open market sales to 18%. With current uncertainties in the market a profit level equating to 20% of GDV is regarded as essential. Also, the introduction of the Residential Property Developer Tax, which reduces developer profits by 4% requires that profit is maintained at 20%. BLVs - Reduced to £100,000 per net acre across the lower and medium value zones. This reduces what were already insufficient BLVs. 3. The report makes references to a BLV caveat, stating that "the BLVs contained herein are for 'high-level' Plan viability purposes" ...and... "no way implies that this figure can be used by applicants to negotiate site specific planning applications". This approach is contrary to Planning Practice Guidance: Viability ('PPGV')3, which states that "Where a viability assessment is submitted to accompany a planning application this should be based upon and refer back to the viability assessment that informed the plan". 4. 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. Unit typologies will vary, depending upon	Profit + BLVs - The 'Pragmatic' testing assumes that concessions must be made on all sides to make development happen. 3. The nature of a Whole Plan Viability Study means that not every scenario can be modelled at the plan-making stage. This is a standard caveat used by the consultants. 4. The housing mix was based on the Central Lancashire Housing Market Assessment and was agreed by the Councils. 5. The Gross/Net ratio is used primarily for establishing BLV, i.e. what is purchased, not what is built. On brownfield sites, often the whole site would be purchased at a single rate. On large strategic greenfield sites, the developable parcels may be purchased at EUV+, whereas the parcels that will not be developed are often purchased at EUV. 6. Further variation in unit types would increase the amount of testing exponentially and is unnecessary for the level of detail expected in a Local Plan Viability Study. 7. Current sale prices for new builds have been considered alongside recent transactions. Unfortunately, developers are not always transparent regarding dwelling sizes when they were contacted. Additional evidence was also		

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			location and site type with more terraced and semi-detached homes of smaller sizing in lower value areas and more detached of larger sizing in higher value areas. A mix including 7% apartments is contrary to market expectations. This assumption should be amended. For sites of 10+ units, there is no open market demand for 1+2-bedroom apartments outside of town centre locations. 5. 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. No explanation of why the Net Site Area for brownfield sites should be 100%. Any development will lose developable area to public open space, biodiversity net gain, roads etc. This overstates the viability of brownfield sites. 6. There should be variation in unit typology for different value areas. 7. Sales values are assessed with reference to historic sold prices from the past three years, with very little regard given to current new build asking prices, mainly due to the lack of comparable data regarding unit sizes. A full breakdown of £ per sq ft values could have been easily obtained by contacting the developers directly. 8. BLVs are adopted at £150,000,	requested during the consultation phase. 8. Unfortunately, no evidence of this nature was received during the consultation phase. The EUV+ approach was used in accordance with RICS Viability guidance. The report's Land Paper explains further. 9. The uplifts consider both Net and Gross area to establish a multiplier that appeared reasonable when looking at it from both perspectives. 10. An allowance of £50,000 per acre is included for site clearance and remediation on brownfield sites. Costs above this should be reflected in the land value. This is an additional contingency and does not preclude site-specific viability assessments where more significant abnormals are identified. 11. It is not usual practice for cash flows to be provided at the plan making stage and providing these would be disproportionate. 12. The Strategic Site appraisals contain commercial sensitive information provided to us by the site promoters / landowners. Unredacted versions will be available to the Inspector. 13. Regarding the examples given (para 6.20, and the same issue with 6.21), the text refers to the results at 35% affordable housing, rather than 30% affordable housing. For brownfield sites		

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			£200,000 and £250,000 per net developable acre for low, medium and high value greenfield sites, with £150,000, £210,000 and £275,000 per net developable acre for brownfield in low, medium and high value areas. Strategic greenfield sites are assessed at £166,666 per net acre. Evidence is provided in respect of previous Local Plan and CIL Viability Assessments, site specific viability assessments (confidential), agricultural land transactions and greenfield residential site transactions. The evidence base would appear appropriate; however, the greenfield residential site transaction evidence mainly relates to very small sites of 0.25-0.6 acres, with one larger site of 6.8 acres having no achieved land value and another larger site of 36 acres having a very low value equating to £58,611 per acre per acre (gross/net not stated). PPGV states that "land transactions can be used but only as a cross-check to the other evidence". It is important for benchmark land values to be sense checked against policy compliant land transactions. We have evidence of seven land sale transactions in Central Lancashire equating to £237,826 - £1,334,036 per gross acre, averaging at £441,848 per gross acre. Each of these developments was policy compliant regarding affordable housing provision and S106 contributions.	within settlements, the 30% figure should have been used, and the figures in Table 6.2 and the appendix are therefore correct. The example demonstrates that the difference in viability between 30% and 35% is relatively small, and that the viability impact (especially in lower value areas), is influenced more by other factors than the level of affordable housing. This is also demonstrated by the sensitivity charts included in our appraisals. Table 6.10 should be labelled 'pragmatic' rather than 'worst case'. The rest of the figures are considered to be correct. 14. Policy HS7, criteria 5 and Policy ID2, criteria 4 enables consideration of viability with regards to affordable housing and S106. Policy HS7 requires different levels of affordable housing depending upon which Tier of the Settlement Hierarchy the site is located. 15. The evidence presented is robust. 16. The £7,000 per unit assumption was informed by the Lancashire County Council's Education Contribution Methodology planning guidance: https://www.lancashire.gov.uk/media/954708/annex-2-education-methodology.pdf. 17. Abnormal costs on Greenfield sites are unlikely and therefore do not feature in the consultant's		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			9. 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. 10. The report clarifies that the assessment of BLV does not allow for abnormal costs contradicting PPG and RICS guidance. PPGV states that "As far as possible, costs should be identified at the plan making stage." "Costs include: build costs based on appropriate data, for example that of the Building Cost Information Service abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value." The testing should set the minimum 'cut-off' point determining the price a landowner should expect and not be subject to further adjustments. The BLVs adopted are too low and cannot be reasonably adjusted downwards any further. 11. No cash flows are provided to support the appraisals in Appendix 8. Sample cash flows should be provided to enable stakeholders to check that timescales and sales rates flow appropriately.	methodology. These costs should be addressed through either the land price or site-specific viability assessment. 18. The consultants are not aware of this evidence. Not all homes include a garage. Consequently, if a small cost increase was applied, it would not materially impact the viability results. 19. Costs regarding M4 have been increased in line with inflation. There is a lack of evidence regarding how BNG costs could be inflated, however. Every site is unique, and in many cases the impacts can be addressed on-site with lower/nil costs (potentially even adding value through green premiums and placemaking). See the report's Impact Assessment. 20. Disagree. EV charge points have been mandatory for several years now so and should be included within BCIS. 21. The Building Safety Levy has not yet been applied to any Viability Studies and its impact is yet unknown. There are no studies which include the impact of changes to red diesel. 22. £500 is robust. 23. 7.5% is robust. 24. 6% is robust		

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			12. Viability Appraisals for the four strategic sites are not included in the report. 13. Unfortunately, many of the reported appraisal results do not match the results which are shown on the summary tables on pages 72 – 100. For example, the lower value brownfield – "Worst Case Scenario" reports an RLV for the 30 unit/within settlement scheme at -£694,852 per acre and a deficit of -£844,8442 per acre. The appraisal summary table reports a RLV of -£669,911 per acre and a deficit of -£819,911 per acre. Also, the 100-unit scheme/within the settlement is incorrect, meaning that 50% of the reported values are wrong. For the Preston City Centre testing, five of the reported seven (71%) RLVs and deficits are incorrect. It appears that the actual RLVs are improved from those included within the reporting, meaning that reductions in build costs and grant required will be slightly reduced when the values are corrected. This calls into question the credibility of the report. 14. The Local 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.			

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			Consideration must be given to zoned affordable housing policy requirements to reflect the negative appraisal outputs, as adopted by many other local authorities. 15. Some evidence is provided to support the adopted values, but one of the three registered providers suggests lower values. Affordable housing values should be reduced. 16. The S106 cost applied to public open space is the average across each Council area. However, a £7,000 per unit education contribution is adopted without evidence. 17. No abnormal costs are applied to greenfield sites. This unrealistic. All sites incur abnormal costs whether brownfield or greenfield. 18. £8,000 per Garage. Following their assessment of national housebuilder garage construction costs, our surveyor considers that £12,500 per garage is more realistic. 19. M4(2), M4(3) and Biodiversity Net Gain – these costs are adopted in line with nationally published documents. They are appropriate, subject to confirmation that they are inflated to present day levels. 20. Costs of mandatory electric vehicle (EV) charging points are too recent to have been factored into BCIS data. A			

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			separate cost allowance is therefore required. 21. No reference is made to Building Safety Levy and removal of Red Diesel costs (which has increased the duty paid on fuel five-fold). 22. Sales legal fees - £500 per unit. These are usually £750 per unit. 23. Debit interest – 7.5%. Considering the current base rate, a debit interest charge of 8% Should be the minimum. 24. Profit on affordable housing – 6%. Following our own discussions with registered providers, this should be 8%. 25. The consultation period of the viability study was too short.			
A31.19	Rep'r Mrs Emily Armstrong Org. F1 Real Estate Management Agent Mr John Francis	Policy Evidence Site	The representor submits the attached report Land adjacent to M65 J3, Stanworth, Chorley, prepared by ICENI, April 2025 as a critical review of the BE Group 2024 Update and previous version. The Executive Summary sets out the following conclusions: Illogical progression of BEG employment evidence updates supporting the plan. Specifically, that through using different data and historic periods of assessment, the reported employment need has fallen. This is against a background of	The Representor has submitted this Executive Summary as an independent representation. Please note other comments/responses recorded against Representor ID: A31 for further detail. The councils consider that the evidence as presented is robust and no changes to the employment supply are required.	No	No

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			market signals for industrial need which identify ongoing low vacancies rates and rising rents, pointing to an increased not decreased requirements. The inconsistency in methodology is unsuitable and opaque in terms of Plan making. The employment evidence does not consider strategic employment needs which the PPG expects that plan making authorities should undertake (Paragraph: 031 Reference ID: 2a-031-20190722). This is stated explicitly in past iterations of the evidence but not in the 2024 work, albeit that the strategic supply is excluded from the balancing implies that strategic need is also not considered. The Iceni evidence does consider strategic need through the lens of a wider property market areas assessment, and finds a high level of need that the BEG work. Iceni's assessment of strategic needs taking into account demand and supply and points to the need for additional large scale facilities in Central Lancs and notably Chorley. This is defined as focusing on the need for larger units of 9,300 sqm or 100,000 sqft and above, over a property market area larger than Central Lancs considered suitable for the occupiers of such units.			

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A39.13	Rep'r	Castle Green Homes	Policy	Evidence	The CLLP needs to acknowledge the NPPF expecting strategic Policies to consider a vision and strategy to look further ahead, up to 30 years. Given the success of the safeguarded land approach previously, safeguarded sites should be accommodated within this Plan. Given the heavily constrained Green Belt nature of Central Lancashire, Safeguarded Sites should be covered in an additional evidence base document setting out how needs have been calculated and to include an assessment of non-Green Belt sites, then previously developed Green Belt sites, grey belt sites and thereafter Green Belt options. Once selected, these should be identified and annotated on the Proposals Map and an accompanying Policy developed. This provides further flexibility in the supply of potential sites and can assist in quickly addressing any shortfall in housing, should identified sites not deliver as expected and/or other triggers within the monitoring requirements are met. It will also cover a position if the Councils adopt this Plan, as they expect, and then fail to progress its replacement immediately as the Government expects. Without the above alterations, the CLLP, as drafted, is not justified nor positively prepared as it seeks to plan for a significant shortfall in housing in Chorley against the Council's own evidence. It will also be effective in managing and maintaining a supply of housing sites should circumstances require this.	NPPF para 149 states that safeguarded land should only be identified where necessary, for the purposes of delivery after the plan period. Plans also must be updated every five years following adoption. The Plan provides sufficient land for housing and employment growth until 2041, with plan review being the best mechanism to address any shortfalls identified through monitoring. Allocating additional safeguarded land is therefore not considered necessary.	No	Yes
	Org.	Castle Green Homes	Site					
	Agent	Mrs Kerry Walker						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)		Comments made against		Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
A67.13	Rep'r	L&Q	Policy	Evidence	With the introduction of BNG, the quantum of development for many sites will be overestimated and this should be factored into the overall supply of homes from the sites selected. The density studies provide a retrospective view of sites completed prior to the introduction of BNG. There is a minor inconsistency between the wording at paragraph 3.4 of the site selection paper and the SHELAA. The Landscape Assessment does not indicate that the land south of Factory Lane performs strongly from a landscape perspective. The Level 1 and 2 SFRAs indicate that the land south of Factory Lane can be allocated if development avoids the area at modelled fluvial risk along the eastern boundary of the site. The HIA and HRA do not identify any constraints to development of the site that cannot be mitigated at planning application stage.	The Council's evidence base is robust and supports the allocation of the Factory Lane site for development.	No	Yes
	Org.	L&Q	Site					
	Agent	Mr Phil Robinson						
A68.06	Rep'r	Wain Homes North West	Policy	Evidence	1. 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. 2. The Pragmatic Scenario has different assumptions compared to Worst Case	1. The rationale for presenting a "Pragmatic Scenario” is robust and explained in detail within the report. 2. The Pragmatic Scenario was accepted at the Wirrall EiP, which considers the current economic climate. It is not expected this would be the case across the whole plan period.	No	Yes
	Org.	Wain Homes North West	Site					
	Agent	Stephen Harris						

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Scenario: Construction costs - Lower quartile costs are adopted for all schemes rather than just for those schemes of 50+ units. Smaller schemes will not be completed by national housebuilders and it is essential that higher construction costs in line with BCIS Median Costs are adopted. Profit - Reduced from 20% on open market sales to 18%. With current uncertainties in the market a profit level equating to 20% of GDV is regarded as essential. Also, the introduction of the Residential Property Developer Tax, which reduces developer profits by 4% requires that profit is maintained at 20%. BLVs - Reduced to £100,000 per net acre across the lower and medium value zones. This reduces what were already insufficient BLVs. 3. The report makes references to a BLV caveat, stating that "the BLVs contained herein are for 'high-level' Plan viability purposes" ...and... "no way implies that this figure can be used by applicants to negotiate site specific planning applications". This approach is contrary to Planning Practice Guidance: Viability ('PPGV')3, which states that "Where a viability assessment is submitted to accompany a planning application this should be based upon and refer back to the viability assessment that informed the plan". 4. 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.	Construction Costs - The 'Pragmatic' testing assumes that housebuilders would find ways to reduce build costs, such as MMC. Profit + BLVs - The 'Pragmatic' testing assumes that concessions must be made on all sides to make development happen. 3. The nature of a Whole Plan Viability Study means that not every scenario can be modelled at the plan-making stage. This is a standard caveat used by the consultants. 4. The housing mix was based on the Central Lancashire Housing Market Assessment and was agreed by the Councils. 5. The Gross/Net ratio is used primarily for establishing BLV, i.e. what is purchased, not what is built. On brownfield sites, often the whole site would be purchased at a single rate. On large strategic greenfield sites, the developable parcels may be purchased at EUV+, whereas the parcels that will not be developed are often purchased at EUV. 6. Further variation in unit types would increase the amount of testing exponentially and is unnecessary for the level of detail expected in a Local Plan Viability Study. 7. Current sale prices for new builds		

Rep ID	Representor Details; and Organisation; and Agent (if applicable)	Comments made against	Council Summary of Rep.	Council Response	Mods proposed? / (If Y then) Schedule Ref	Requested to speak at EIP?
			Unit typologies will vary, depending upon location and site type with more terraced and semi-detached homes of smaller sizing in lower value areas and more detached of larger sizing in higher value areas. A mix including 7% apartments is contrary to market expectations. This assumption should be amended. For sites of 10+ units, there is no open market demand for 1+2-bedroom apartments outside of town centre locations. 5. 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. No explanation of why the Net Site Area for brownfield sites should be 100%. Any development will lose developable area to public open space, biodiversity net gain, roads etc. This overstates the viability of brownfield sites. 6. There should be variation in unit typology for different value areas. 7. Sales values are assessed with reference to historic sold prices from the past three years, with very little regard given to current new build asking prices, mainly due to the lack of comparable data regarding unit sizes. A full breakdown of £ per sq ft values could have been easily obtained by contacting the developers directly. 8. BLVs are adopted at £150,000, £200,000 and £250,000 per net	have been considered alongside recent transactions. Unfortunately, developers are not always transparent regarding dwelling sizes when they were contacted. Additional evidence was also requested during the consultation phase. 8. Unfortunately, no evidence of this nature was received during the consultation phase. The EUV+ approach was used in accordance with RICS Viability guidance. The report's Land Paper explains further. 9. The uplifts consider both Net and Gross area to establish a multiplier that appeared reasonable when looking at it from both perspectives. 10. An allowance of £50,000 per acre is included for site clearance and remediation on brownfield sites. Costs above this should be reflected in the land value. This is an additional contingency and does not preclude site-specific viability assessments where more significant abnormals are identified. 11. It is not usual practice for cash flows to be provided at the plan making stage and providing these would be disproportionate. 12. The Strategic Site appraisals contain commercial sensitive information provided to us by the site promoters / landowners. Unredacted versions will be available to the Inspector.		

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			developable acre for low, medium and high value greenfield sites, with £150,000, £210,000 and £275,000 per net developable acre for brownfield in low, medium and high value areas. Strategic greenfield sites are assessed at £166,666 per net acre. Evidence is provided in respect of previous Local Plan and CIL Viability Assessments, site specific viability assessments (confidential), agricultural land transactions and greenfield residential site transactions. The evidence base would appear appropriate; however, the greenfield residential site transaction evidence mainly relates to very small sites of 0.25-0.6 acres, with one larger site of 6.8 acres having no achieved land value and another larger site of 36 acres having a very low value equating to £58,611 per acre per acre (gross/net not stated). PPGV states that "land transactions can be used but only as a cross-check to the other evidence". It is important for benchmark land values to be sense checked against policy compliant land transactions. We have evidence of seven land sale transactions in Central Lancashire equating to £237,826 - £1,334,036 per gross acre, averaging at £441,848 per gross acre. Each of these developments was policy compliant regarding affordable housing provision and S106 contributions. 9. The report adopts BLVs based on Net Developable Site Areas. Landowners however expect payment for the full Gross Site Area. BLVs should be assessed	13. Regarding the examples given (para 6.20, and the same issue with 6.21), the text refers to the results at 35% affordable housing, rather than 30% affordable housing. For brownfield sites within settlements, the 30% figure should have been used, and the figures in Table 6.2 and the appendix are therefore correct. The example demonstrates that the difference in viability between 30% and 35% is relatively small, and that the viability impact (especially in lower value areas), is influenced more by other factors than the level of affordable housing. This is also demonstrated by the sensitivity charts included in our appraisals. Table 6.10 should be labelled 'pragmatic' rather than 'worst case'. The rest of the figures are considered to be correct. 14. Policy HS7, criteria 5 and Policy ID2, criteria 4 enables consideration of viability with regards to affordable housing and S106. Policy HS7 requires different levels of affordable housing depending upon which Tier of the Settlement Hierarchy the site is located. 15. The evidence presented is robust. 16. The £7,000 per unit assumption was informed by the Lancashire County Council's Education Contribution Methodology planning guidance: https://www.lancashire.gov.uk/media/954708/annex-2-education-		

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			on this basis. 10. The report clarifies that the assessment of BLV does not allow for abnormal costs contradicting PPG and RICS guidance. PPGV states that “As far as possible, costs should be identified at the plan making stage.” “Costs include: build costs based on appropriate data, for example that of the Building Cost Information Service abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value.” The testing should set the minimum ‘cut-off’ point determining the price a landowner should expect and not be subject to further adjustments. The BLVs adopted are too low and cannot be reasonably adjusted downwards any further. 11. No cash flows are provided to support the appraisals in Appendix 8. Sample cash flows should be provided to enable stakeholders to check that timescales and sales rates flow appropriately. 12. Viability Appraisals for the four strategic sites are not included in the report. 13. Unfortunately, many of the reported appraisal results do not match the results which are shown on the summary tables	methodology.pdf. 17. Abnormal costs on Greenfield sites are unlikely and therefore do not feature in the consultant’s methodology. These costs should be addressed through either the land price or site-specific viability assessment. 18. The consultants are not aware of this evidence. Not all homes include a garage. Consequently, if a small cost increase was applied, it would not materially impact the viability results. 19. Costs regarding M4 have been increased in line with inflation. There is a lack of evidence regarding how BNG costs could be inflated, however. Every site is unique, and in many cases the impacts can be addressed on-site with lower/nil costs (potentially even adding value through green premiums and placemaking). See the report’s Impact Assessment. 20. Disagree. EV charge points have been mandatory for several years now so and should be included within BCIS. 21. The Building Safety Levy has not yet been applied to any Viability Studies and its impact is yet unknown. There are no studies which include the impact of changes to red diesel. 22. £500 is robust. 23. 7.5% is robust.		

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			on pages 72 – 100. For example, the lower value brownfield – "Worst Case Scenario" reports an RLV for the 30 unit/within settlement scheme at -£694,852 per acre and a deficit of -£844,8442 per acre. The appraisal summary table reports a RLV of -£669,911 per acre and a deficit of -£819,911 per acre. Also, the 100-unit scheme/within the settlement is incorrect, meaning that 50% of the reported values are wrong. For the Preston City Centre testing, five of the reported seven (71%) RLVs and deficits are incorrect. It appears that the actual RLVs are improved from those included within the reporting, meaning that reductions in build costs and grant required will be slightly reduced when the values are corrected. This calls into question the credibility of the report. 14. The Local 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. Consideration must be given to zoned affordable housing policy requirements to reflect the negative appraisal outputs, as adopted by many other local authorities. 15. Some evidence is provided to support the adopted values, but one of the three	24. 6% is robust. 25. The consultation period was appropriate.		

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			registered providers suggests lower values. Affordable housing values should be reduced. 16. The S106 cost applied to public open space is the average across each Council area. However, a £7,000 per unit education contribution is adopted without evidence. 17. No abnormal costs are applied to greenfield sites. This unrealistic. All sites incur abnormal costs whether brownfield or greenfield. 18. £8,000 per Garage. Following their assessment of national housebuilder garage construction costs, our surveyor considers that £12,500 per garage is more realistic. 19. M4(2), M4(3) and Biodiversity Net Gain – these costs are adopted in line with nationally published documents. They are appropriate, subject to confirmation that they are inflated to present day levels. 20. Costs of mandatory electric vehicle (EV) charging points are too recent to have been factored into BCIS data. A separate cost allowance is therefore required. 21. No reference is made to Building Safety Levy and removal of Red Diesel costs (which has increased the duty paid on fuel five-fold). 22. Sales legal fees - £500 per unit. These			

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			are usually £750 per unit. 23. Debit interest – 7.5%. Considering the current base rate, a debit interest charge of 8% Should be the minimum. 24. Profit on affordable housing – 6%. Following our own discussions with registered providers, this should be 8%. 25. The consultation period of the viability study was too short.			
A70.9	Rep'r Mr Farrington Org. Trustees of the Worden Estate Agent Mr Andy McMullan	Policy Evidence Site	Transitional arrangements The growth and ambition proposed within the draft Local Plan is clearly the minimum that the Council needs to be compliant with the NPPF Transitional Arrangements. It shows no ambition. Housing supply The supply of housing over the plan period is based heavily (18%) on windfall allowances. This is justified based on previous delivery. The high windfall delivery was when the Council were required to deliver only 169 units a year and therefore had far fewer allocations over the plan period. The CLLP also proposes allocations as few as 5 units.	The representor makes broad / brief comments regarding some of the Plan's evidence. Transitional arrangements Acknowledgment that NPPF Transitional Arrangements have been met is noted. The CLLP proposes ambitious housing requirements to deliver growth. Housing supply The representor's argument regarding windfall allowance is not logical. Several allocations from the adopted Local Plans (2015) are being continued into the	No	Yes

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			This would suggest that there are far fewer opportunities. Open Land Designations Study / Green Belt Assessment (2022). It should be noted that this evidence base to support the Local Plan was written under a different national planning policy context (i.e. pre- NPPF 2024). Employment Land Study (2025) The study notes that South Ribble largest employment allocation: Cuerden, is yet to deliver. Consequently, South Ribble should consider opportunities along its strategic road corridors, particularly for B2/B8 premises. South Ribble Retail and Leisure Study (2017) The retail and leisure evidence base that underpins the draft Local Plan dates back to 2017. In accordance with the requirements of the NPPF (2023 and	CLLP. Smaller allocations are also proposed within the CLLP as this is necessitated by NPPF (2023), para 70a. Open Land Designations Study / Green Belt Assessment (2022). The 5x purposes of the Greenbelt did not change between NPPF 2023 and 2024. The study therefore remains robust. Employment Land Study (2025) Cuerden is deliverable. Most of the site has planning permission. The employment land supply is sufficient to meet the identified need for the Plan period. South Ribble Retail and Leisure Study (2017) The study was updated in 2025 (see doc ER07a). This explains the difficult market conditions retailers currently experience. Consequently, no allocations are proposed.		

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			2024), evidence base should be updated to reflect the revised growth ambitions from Central Government. Given the recommendations of the report (albeit 7.5 years out of date) it is surprising that the Regulation 19 Draft Local Plan does not propose any retail allocations. Transitional arrangements The growth and ambition proposed within the draft Local Plan is clearly the minimum that the Council needs to be compliant with the NPPF Transitional Arrangements. It shows no ambition. Housing supply The supply of housing over the plan period is based heavily (18%) on windfall allowances. This is justified based on previous delivery. The high windfall delivery was when the Council were required to deliver only 169 units a year and therefore had far fewer allocations over the plan period. The CLLP also proposes allocations as few as 5 units. This would suggest that there are far fewer opportunities.			

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			Open Land Designations Study / Green Belt Assessment (2022). It should be noted that this evidence base to support the Local Plan was written under a different national planning policy context (i.e. pre- NPPF 2024). Employment Land Study (2025) The study notes that South Ribble largest employment allocation: Cuerden, is yet to deliver. Consequently, South Ribble should consider opportunities along its strategic road corridors, particularly for B2/B8 premises. South Ribble Retail and Leisure Study (2017) The retail and leisure evidence base that underpins the draft Local Plan dates back to 2017. In accordance with the requirements of the NPPF (2023 and 2024), evidence base should be updated to reflect the revised growth ambitions from Central Government.			

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					Given the recommendations of the report (albeit 7.5 years out of date) it is surprising that the Regulation 19 Draft Local Plan does not propose any retail allocations.			
B50.2	Rep'r	Taylor Wimpey and Homes England	Policy	Evidence	The Developers have reviewed the Main Viability Report prepared by Aspinall Verdi (CD13) which forms part of the CLLP evidence base and makes comments on the viability and deliverability of each strategic allocation within the CLLP. With regards to the viability and deliverability of the Pickering's Farm allocation, the report summarises on Page 123 that: "At this stage there is poor transparency from the site promoters on the option agreements and minimum land values, and no cost information has been provided on strategic infrastructure costs. Therefore, as the financial viability of the site is currently shown as unviable, and no external funding has been identified, the site is currently RAG rated, but this should be reviewed as more detailed information becomes available." The above text implies that the allocation	The comments regarding the viability of the strategic site are noted.	No	Yes
	Org.	Taylor Wimpey and Homes England	Site					
	Agent							

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			is not viable because information regarding land values and costs has not been shared with Aspinall Verdi. Whilst The Developers accept that limited information has been provided, when asked to provide detailed financial information, The Developers have continually clarified to Aspinall Verdi that there are contractual requirements in place, which are commercially sensitive and subject to CMA rules which prevents the ability to share any commercially sensitive information with third parties and particularly those who could release this information into the public domain. If The Developers were to breach their development contracts or break CMA rules by sharing commercially sensitive information this could result in either loss of control of the development site or fines calculated at a percentage of company GDV, neither would be a reasonable request for “proportionate evidence”. The viability of the outline applications was rigorously tested at the appeal stage and therefore the appeal decisions should provide sufficient comfort that the outline consents are viable and deliverable. It is also relevant that the land subject to the outline consents is controlled by Homes England who are the			

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			government's housing and regeneration agency and Taylor Wimpey who are one of the UK's major PLC house builders. Homes England have extensive experience of delivering housing on greenfield development sites across Central Lancashire. They have a track record of successfully bringing land to market whilst achieving positive land values and being policy compliant on all Homes England consented City Deal sites with developer contributions. Their promotion and disposal of similar greenfield residential sites have attracted strong market interest and multiple, compliant bids from developers. Likewise, Taylor Wimpey is one of the leading house builders in the UK and also a have strong evidence of housing delivery, building over 15,000 homes a year. The involvement of these two partners should give confidence to the attractiveness of the market and support for the delivery of development on this site. The Developers are willing to cooperate with the preparation of the CLLP evidence base and are happy to liaise further with Aspinall Verdi, in so far as providing updates, which are non-commercially sensitive, including with regards to the progress of future			

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			applications. As with any project, The Developers reserve the right to explore viability in more detail throughout the lifetime of the project including the construction phase.			
D04.12	Rep'r Laura Marchant Org. Homes England Agent	Policy Evidence Site	There are currently some gaps and missing information in the IDP; including infrastructure related to Homes England land ownership. Detail has not been provided on the necessity of this infrastructure, more evidence on why these are required to support Local Plan growth (such as the Cowling Farm Highway Improvement and Cross Borough Link Road) and therefore Homes England questions whether this is justified.	It is considered that the 'Review and Update of the Infrastructure Delivery Plan' evidence base document provides sufficient reasoning as to the requirements of the schemes contained within the Infrastructure Delivery Plan. Additionally, transport evidence has been commissioned which exemplifies the necessity of a number of the identified transport infrastructure projects within the IDP.	No	Yes
D04.13	Rep'r Laura Marchant Org. Homes England Agent	Policy Evidence Site	In relation to the Viability Appraisal, it is considered that: The 'Pragmatic scenarios' modelled are too optimistic. Abnormal costs should be modelled on greenfield sites. A developer's profit of 20% should be modelled.	It is considered that the Viability Appraisal is robust.	No	Yes

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D04.17	Rep'r Org. Agent	Laura Marchant Homes England	Policy Site	Evidence	The Central Lancashire Playing Pitch Strategy & Action Plan (2018) identifies a need for sports pitch provision linked to anticipated housing growth across Preston. The majority of this housing growth is set to be delivered in the west of the North West Preston area, some distance from the Eastway Site. To align with the concentration of this housing growth, and ensure they are easily accessible by the local community, we consider a more appropriate strategy for the provision of new sports pitches would be to locate them to the west of North West Preston and not on the Eastway Site	This is noted. The playing pitch evidence base and OSSRS are currently being updated. These will be the basis for OS assessments once adopted.	No	Yes
D12.4	Rep'r Org. Agent	Richard Sharples Lancashire County Council	Policy Site	Evidence	Policy wording for each proposed allocation's Key Development Considerations (KDCs), is too limited to ensure resilience against all types of flooding. Consideration should be given to the Environment Agency's updated National Flood Risk Mapping (NaFRA2) (published December 2025).	Where flood risk is identified as a significant constraint on a proposed allocation, this is detailed sufficiently within each site's KDC. The KDCs should be read alongside the Plan's suite of other policies regarding flooding (EN10-EN12) and national policy. NaFRA2 was published after the Reg 19 consultation closed. The councils have however signed a Statement of common Ground with the Environment Agency covering NaFRA2.	No	No
D15.15	Rep'r Org. Agent	Andrew Leyssens United Utilties	Policy Site	Evidence	There are a number of reservoirs within Central Lancashire, each with its own reservoir flooding zone, showing how far flood water would spread from the reservoir in the unlikely event that a reservoir failed. In relation to reservoir flood zones, we draw your attention to	Flood risk from reservoirs is considered in the Council's Level 2 SFRA's. It is not considered necessary to amend the wording of existing site allocation policies and KDC's.	No	No

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			the advice within the National Planning Practice Guidance on Flood Risk and Coast Change. This states that the local planning authority will need to evaluate the potential damage to buildings or loss of life in the event of dam failure, compared to other risks, when considering development downstream of a reservoir. Local planning authorities will also need to evaluate in Strategic Flood Risk Assessments (and when applying the Sequential Test) how an impounding reservoir will modify existing flood risk in the event of a flood in the catchment it is located within, and/or whether emergency draw-down of the reservoir will add to the extent of flooding. When allocating land for development within a reservoir flood zone, local planning authorities should also discuss their proposed site allocations with reservoir undertakers (such as United Utilities) at the earliest opportunity. We request that where sites are located in a reservoir flood risk location, the issue must be reflected as a constraint in a site-specific policy / key development consideration.			
D25.1	Rep'r Mr Richard Sewell Org. Sport England Agent	Policy Evidence Site	Allocations on, or affecting, sports sites should be based on an up to date Playing Pitch Strategy. Additionally, new development will generate demand for sporting provision.	It is considered that the evidence base supporting the Plan policies regarding open space & playing pitches is robust, and it should also be noted that the playing pitch evidence base and OSSRS are currently being updated. These will	No	No

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			Therefore, new developments should contribute towards meeting the demand generated through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base.	be the basis for Open Space assessments once adopted.		
D26.22	Rep'r: Ms Rachel Whitaker Org.: Natural England Agent:	Policy: Evidence Site:	Natural England notes that the HRA has been produced by LUC. As competent authority the Councils will need to adopt the HRA to fulfil their duties. Natural England notes that an Appropriate Assessment has been carried out in accordance with Regulation 63 of the Conservation of Species and Habitat Regulations 2017 (as amended). This concluded that the proposals will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment and the measures proposed to mitigate for all adverse effects that could potentially occur, we generally concur with the comments made. However, the AA should be amended to align with our comments regarding the Liverpool City region recreation mitigation strategy. NE advise a strategic approach for Sefton Coast habitat sites may not be necessary and advise removal. We advise that the Liverpool Bay SPA is removed from the Screening and Appropriate Assessment stage. Consequently, we advise that participation within the Liverpool City Region recreation mitigation strategy is not required.	These comments and support for policies are noted and addressed further in the Statement of Common Ground with Natural England.	No	No

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			Natural England welcome the commitment within Section 5.2 of the HRA to work with neighbouring authorities and Natural England regarding the ongoing recreational disturbance work around Morecambe Bay Habitat Sites. However, we advise this work is still in its early stages, and the progress of this work and your Local Plan timescales may not align. Therefore, you may wish to remove the wording of having the commitment 'before the Local Plan is adopted'. We advise having the correct policy hook which demonstrates that you will accept the future outputs of the Morecambe Bay work will be sufficient. NE support the general aim of policies, HS5, EN5 EN7, EN10, EN11, and EN12			

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Duty to Co-operate						Count of Representations against this policy/section:		2
A45.14	Rep'r	Taylor Wimpey UK Limited	Policy	Duty to Co-operate	Consider councils not sufficiently engaged with neighbouring authorities and fail the test of the duty. Interim DTC statement only refers to three meetings and would be expected further progress would have been made ahead of the Regulation 19 consultation commencing. Should cross-boundary infrastructure or unmet need be identified further Regulation consultation would be required.	The Councils have fulfilled the duty to cooperate and an updated summary of the engagement that has taken place will be prepared for the Inspector alongside signed statements of common ground with relevant partners.	No	Yes
	Org.	Taylor Wimpey UK Limited	Site					
	Agent	Megan Wilson						
A64.3	Rep'r	Mr Matthew Banks	Policy	Duty to Co-operate	Evidence in the DTC Statement is insufficient and does not clearly demonstrate meaningful collaboration has occurred with surrounding LPAs regarding specific matters.	The Councils have successfully discharged their duties with regards the Duty to Cooperate as set out in the Localism Act 2011 section 110 (inserted into Part 2 of the Planning and Compulsory Purchase Act 2004 (local development) Section 33A. The Councils have engaged constructively, actively and on an ongoing basis with all neighbouring Councils in addition to prescribed bodies. The Councils have also fully complied with the provisions of NPPF including demonstrating effective and on-going joint working, by preparing and maintaining one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. NPPF paragraph 27 (December 2024) states 'Plans come forward at different	No	Yes
	Org.	Private Individual	Site					
	Agent	Mr Luke Banks						

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				times, and there may be a degree of uncertainty about the future direction of relevant development plans or the plans of infrastructure providers. In such circumstances strategic policy-making authorities and Inspectors will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities.' With regards transport evidence this has been applicable with this matter requiring collaboration between the Councils and the County Council as the Transport Authority.		

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Integrated Assessment						Count of Representations against this policy/section:		6
A37.1	Rep'r	Mr Andrew Dewhurst	Policy	Integrated Assessment	1. The Integrated Assessment (IA) fails to meet the requirements of national policy, the 2004 SEA Regulations and the SEA Directive. Consequently, the CLLP cannot be an appropriate strategy pursuant to NPPF para 36. 2. Sustainability Appraisal (SA) help promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve its vision and objectives. The IA should justify its policy choices and be clear about why some options have been progressed or rejected. If the evidence base for key matters such as highways and transport is not available, then it is impossible for the SA to justify its policy choices alongside undertaking a comparative and equal assessment of each reasonable alternative. 3. The Councils have placed greater importance on avoiding Green Belt release through the Local Plan preparation process rather than directing development to the most sustainable locations and away from areas at risk of Flood Risk. The Councils should have determined the most sustainable development options before	1. Table 1.1 of the IA (CD05) outlines where each requirement of the SEA Regulations has been met. The requirements of the SEA Regulations are reiterated in the NPPF and PPG. 2. The role of the SA (undertaken as part of the IA) is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve environmental, social and economic objectives. Reasonable alternatives were considered throughout the plan-making process as follows: - Housing + Employment quantum options and spatial strategy options (Chapter 4 of the IA) - Site options (Chapter 5 of the IA) - Policy options (Chapter 6 of the IA) The IA report sets out in Chapter 4 and Appendix D, the Council's reasons for selecting or rejecting each option. While some of the reasoning relates to the SA, it is appropriate for the Council to consider other planning matters alongside the SA findings, and it is not the role of the SA to dictate which options should be taken forward. The SA of site options was based on evidence available at the time and was	No	Yes
	Org.	Maple Grove Developments Ltd	Site					
	Agent	Mr Justin Cove						

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			determining whether there were exceptional circumstances to justify Green Belt release.	in an appropriate format for appraising all reasonable alternative options on a consistent basis. As set out in the IA report, the appraisal of site options was undertaken largely on a spatial basis using GIS data. Transport and highways evidence is unlikely to be of a format that is appropriate for use in site appraisals of this nature. In any case, evidence such as this referring to infrastructure and delivery would typically be considered by the Councils alongside the IA conclusions rather than feeding directly into the IA. The IA has considered transport matters in the context of a SA. Regarding Transport, numerous sources of data informing the IA's evidence base are set out in Appendix B of the Integrated Assessment Final Report (CD05). The framework against which the emerging plan has been appraised comprises 19 objectives. One of these, IA objective 9: Promote sustainable modes of transport, focuses on reducing the need to travel and encouraging more walking, cycling and public transport use. For IA objective 9, each reasonable alternative site option was assessed in terms of proximity to railway stations, bus stops, in addition to settlements as these are a good proxy for where services and facilities are within close proximity of one another which reduces the need to travel.		

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				The Transport Study (IT06a) explores the deliverability of transport infrastructure and consequently not directly relevant to the IA objective. Instead, it sits alongside the IA as another piece of evidence to help inform the emerging plan. 3. The representor's comment regarding Green Belt relates more to the Plan itself than the IA. However, Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, consideration is not given to the Green Belt in IA.		
A45.1	Rep'r Taylor Wimpey UK Limited Org. Taylor Wimpey UK Limited Agent Megan Wilson	Policy Integrated Assessment Site	1. We object to the Integrated Appraisal process and the identification and assessment of reasonable alternatives. With reference to the quantum of housing, it is confirmed at paragraph 2.23 that despite the Central Lancashire Housing Study having identified nine scenarios for assessing local housing needs, the IA only tests four scenarios. It is stated that this is on the basis that the five excluded scenarios were formulated on trend-based projections, which have historically been volatile in Central Lancashire and are 'considered unlikely' to accurately capture all circumstances to be considered in assessing housing needs. The five scenarios set out have been group into three options tested through	1. Chapter 4 ('Integrated Assessment findings for the quantum and spatial strategy options') presents an appraisal of the housing quantum options (Table 4.1) followed by an appraisal of the spatial strategy options (Table 4.2). Although each housing quantum option indicates what percentage of development would be provided in each of the three authorities, they do not go into any further detail on where in the three authorities the growth would be located (this is further developed through the appraisal of the spatial distribution options and the individual site options). Therefore for this initial appraisal of high-level quantum options, the focus of the appraisal was mainly on	No	Yes

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			the IA as follows: Option 1: LHN Baseline – 944 dwellings Option 2: POPGROUP 5-Year – 1,212 dwellings Option 3: Employment-Led Projections – 1,275 dwellings The Councils preferred approach is Option 3 which out of the three tested scenarios, would deliver the highest quantum of growth, but which would result in a significant redistribution of growth across the three authorities compared with LHN. Significantly higher levels of growth would be required within South Ribble, higher growth would be required in Preston, with a significant reduction in growth directed to Chorley as set out below; Table 1: Comparison of distribution of growth LPA% of requirement – Option 1 LHN% of requirement – Option 3 Employment led% difference Chorley54%33-38%Between -16% and -21% Preston29%30-36%Between +1 and +7% South Ribble18%31-33%Between +13% and +15% It is surprising to note that the IA fails therefore to explicitly consider the redistribution of growth proposed in Option 3 and focuses more generally on the quantum of growth (with the notable exception of noting in regard to criteria IA9 that Option 2 would promote sustainable transport to a greater degree). The simple fact is that LHN indicates that	the total housing quantum for the whole plan area with reference to the proportional split of development between the three authorities where particularly relevant. 2. The IA appraised the Central Lancashire Local Plan against environmental, social and economic IA objectives. This is in accordance with the SEA Regulations, which require assessment of effects in relation to the following 'SEA topics': biodiversity, population, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage) and landscape, and the inter-relationship between these. 3. As described in the IA, the spatial strategy in the Central Lancashire Local Plan is primarily based on Option 1 and contains elements of Options 2 and 3. We explain in our summary of the IA of the spatial strategy options that of all five spatial strategy options, Option 2 performs most positively across the objectives (based on the number of significant positive and significant negative effects) and Option 5 performs most poorly (also based on the number of significant positive and significant effects), although this is only marginal. The Council's preferred strategy does not need to be based on whichever option performs more positively (IA is a decision-aiding tool not a decision-making tool). As explained in paragraph 2.20 of the IA, the IA findings are not the		

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			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. The Councils should treat this exercise in the same way they would any assessment of unmet needs and should consider, as part of the IA, the impact of additionally car journeys for work, leisure and socialising on air quality, congestion and the wider environmental and climate aspirations of the Plan. 2. Despite the narrow definition of environmental benefit and harm, the IA does not give enough weight to economic and social objectives. The socioeconomic benefits of providing housing and job growth in the most suitable locations to fulfil need where said need arises is not sufficiently taken into account in the Plan making process as outlined in the IA. 3. In regard to spatial strategy options, the IA tests four options; Option 1: Roll forward the current approach Option 2: Urban intensification Option 3: More urban extensions Option 4: A more dispersed pattern of development Option 5: a New Settlement The Councils' preferred Option is 1: Roll forward the current approach, which it is suggested seeks to focus growth on the most sustainable locations whilst not seeking to fundamentally restrict development elsewhere in the plan area.	only factors taken into account when plan-makers are determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the IA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for the plan. The Council's reasons for selecting the spatial strategy as included in the Publication Local Plan are explained at paragraphs 4.14 to 4.15 of the IA report. 4. Chapter 5 ('Integrated Assessment findings for the Local Plan site options') of the IA presents an appraisal of all reasonable alternative site options. These were identified by the Central Lancashire Authorities who following three 'Call for Sites' exercises and a range of other sources, including council owned land, sites on the Brownfield Register and a desktop review to identify any other potential sites, undertook an assessment of each site that considered their suitability for development and any environmental constraints. This led to a number of sites being discounted as reasonable alternatives. We explain in the IA that following the Regulation 18/Preferred Options stage, many more reasonable alternative site options were identified and		

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			Whilst we have concerns over the testing of reasonable alternatives, we do consider that Option 4, even in the Councils' own assessment, performs slightly more favourably against the identified criteria than Option 1. As such it appears that the Councils' chosen strategy has been pre-determined with further testing of reasonable alternatives seemingly dismissed. We support a more dispersed spatial strategy, whilst acknowledging the need to focus as much growth as possible on urban areas, we consider that the limitations in terms of highway capacity and air quality, set out in the IA, in Preston in particular, are not sufficiently reflected in the scoring set out in the IA. 4. Turning to the assessment of sites, it is noted that within the supporting text of the Plan it is confirmed that the assessment of sites within the Green Belt was 'parked' whilst seeking to establish if needs could be met outside of the Green Belt. It is noted that the Plan has been prepared against the provisions of the NPPF 2023, but in the context of the need to urgently boost delivery and with the revisions to national policy and the introduction of Grey Belt and clearer guidance on inappropriate development in the Green Belt, we do not consider it justified to fail to consider sustainable Green Belt sites, which could deliver more significant environmental and socio-economic benefits than many Brownfield sites. The IA therefore does not consider all reasonable alternatives.	subsequently appraised, as Preston City Council and South Ribble Borough Council reinstated a large number of sites that they had previously discounted prior to the Preferred Options consultation. A small number of additional sites were also taken forward following their submission during the Preferred Options consultation. The Councils did not consider Green Belt sites (with the exception of previously developed sites in the Green Belt) to be reasonable alternative site options until it had been established if there was sufficient land available outside of the Green Belt to meet the identified housing and employment needs. Although, in error, two sites were provided to LUC for appraisal (19P308a and 19S119) in the Green Belt and do not comprise previously developed land. 5. Each element of the Central Lancashire Local Plan has been appraised against the IA framework. IA objective 7 covers community infrastructure by seeking to "Ensure access to and provision of appropriate social infrastructure." The IA is undertaken at a strategic scale where the timing of site delivery has not yet been determined. 6. Table 1.1 of the IA outlines where each requirement of the SEA Regulations (also referred to as The Environmental Assessment of Plans and Programmes Regulations 2004) has been met in the IA. Responses to the specific points raised by the consultee		

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						5. The scoring of the SA should take into account the advantages of early site delivery and the delivery of community benefits, and it should be acknowledged that the delivery of community infrastructure is essential for attaining the SA's goals. As drafted the SA fails in this regard. 6. We fundamentally consider the IA to be inadequate and legally non-compliant. We consider that the IA fails to adequately, accurately and consistently test reasonable strategic options and specific sites.	are provided above.		
A64.2	Rep'r Org. Agent	Mr Matthew Banks Private Individual Mr Luke Banks	Policy Site	Integrated Assessment		1. 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. 2. 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. The Environmental Report lacks proper consideration of cumulative effects, especially on landscape, biodiversity, and traffic, particularly where large housing allocations are proposed near sensitive	1. The consideration of reasonable alternatives has been a key focus of attention within the IA process. Chapter 4 ('Integrated Assessment findings of the quantum and spatial strategy options') presents the IA findings for the reasonable alternative quantum and spatial strategy options that have been considered for the Local Plan. Paragraph 4.7 provides the reasoning behind the Councils' preferred quantum option, while paragraphs 4.14 to 4.15 provide the reasoning behind the Councils' preferred spatial strategy option. Chapter 5 ('Integrated Assessment findings for the Local Plan site options') presents the IA findings for the reasonable alternative site options that have been considered for the Local Plan. Appendix D ('Reasons for selecting or rejecting site options') provides the Councils' reasons for selecting site	No	Yes

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			or overburdened areas. 3. Revise the Environmental Report to include a more robust assessment of the cumulative impact of all proposed allocations on traffic, biodiversity, landscape and air quality. This will ensure compliance with Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 and satisfy the justified test under paragraph 35 of the NPPF by demonstrating that the preferred spatial strategy is based on sound comparative evidence. 4. Revise the Environmental Report to include a more robust assessment of reasonable alternatives to major site allocations, including smaller-scale dispersal and urban intensification options. This will ensure compliance with Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 and satisfy the justified test under paragraph 35 of the NPPF by demonstrating that the preferred spatial strategy is based on sound comparative evidence. 5. Amend the Sustainability Appraisal and relevant policy wording to more explicitly support active travel, public transport, climate resilience, and net biodiversity net gain. Suggested addition to policy wording: “All major developments must demonstrate measurable net gains for biodiversity, integrate sustainable	options for allocation and rejecting others. 2. Table 1.1 of the IA outlines where each requirement of the SEA Regulations (also referred to as The Environmental Assessment of Plans and Programmes Regulations 2004) has been met in the IA. Chapter 7 (‘Cumulative effects’) of the IA presents an assessment of the cumulative effects of the Publication Local Plan against each IA objective (these cover landscape, biodiversity and transport). This incudes an assessment of cumulative effects on geographical areas, i.e. where large housing allocations are proposed near sensitive or overburdened areas. 3. The IA already contains a robust assessment of the cumulative effects of the Local Plan against each IA objective. Traffic is not one of the SEA topics identified in the SEA Regulations; however IA objective 3 considers transport and utilities while IA objective 9 covers sustainable transport. IA objective 11 covers biodiversity and the cumulative effects of the Local Plan on biodiversity are outlined in paragraphs 7.28 to 7.31 of the IA. IA objective 10 covers air quality and the cumulative effects of the Local Plan on air quality are outlined in paragraphs 7.26 to 7.27 of the IA. 4. Chapter 4 (‘Integrated Assessment findings for the quantum and spatial strategy options) in the IA presents an		

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			drainage systems (SuDS), and maximise accessibility via active and sustainable travel modes." This will bring the plan in line with key principles of sustainable development in the NPPF and legal duties under the Environmental Act 2021. 6. Additionally, I request a revision to the Sustainability Appraisal (SA) to ensure that land off Hugh Barn Lane is properly and fairly assessed against alternative site options. The current SA and site selection methodology do not provide transparent or consistent criteria for exclusion of this site and fail to demonstrate that the preferred allocations perform better against sustainability objectives.	appraisal of spatial strategy options. A more dispersed (transport led) pattern of development has been appraised (Option 4), in addition to an urban intensification option (Option 2). Option 1 involved rolling forward the existing 'settlement hierarchy' approach, enabling development at a scale proportionate to settlement size. This approach is supported by national planning policy and considered most sustainable. 5. This comment relates more to the Local Plan than the IA. The IA assesses the extent to which elements of the Local Plan judged against reasonable alternatives will help achieve relevant environmental, social and economic objectives. 6. Chapter 5 ('Integrated Assessment findings for the Local Plan site options') of the IA presents an appraisal of all reasonable alternative site options. As explained in that chapter, these were identified by the Central Lancashire Authorities who following three 'Call for Sites' exercises and a range of other sources, including council owned land, sites on the Brownfield Register and a desktop review to identify any other potential sites, undertook an assessment of each site that considered their suitability for development and any environmental constraints. This led to a number of sites being discounted as reasonable alternatives. We explain in the IA that following the Regulation 18/Preferred Options stage,		

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						many more reasonable alternative site options were identified and subsequently appraised, as Preston City Council and South Ribble Borough Council reinstated a large number of sites that they had previously discounted prior to the Preferred Options consultation. A small number of additional sites were also taken forward following their submission during the Preferred Options consultation. The sites at Hugh Barn Lane, New Longton are within the Green Belt. The Councils did not consider Green Belt sites (with the exception of previously developed sites in the Green Belt) to be reasonable alternative site options until it had been established if there was sufficient land available outside of the Green Belt to meet the identified housing and employment needs.		
B25	Rep'r Org. Agent	Ms Susan Fox Private Individual	Policy Site	Integrated Assessment	Habitats Regulation Assessment requires builders/ property developers to comply with wildlife legislation with a responsibility on the LPA to enforce this according to the NERC Act. 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. Wording of policies/ KDC's should be amended to ensure compliance with wildlife legislation. Development should deliver mixed	Comment does not relate directly to the IA. There are policies in the plan which protect wildlife EN6-9. As set out in Appendix C ('Site assessment criteria'), the appraisal of site options against IA objective 17 gives consideration to agricultural land and if a site is classed as Grade 1 or 2 agricultural land (using the Agricultural Land Classification), it receives a significant negative effect in relation to IA objective 17. If it is classed as Grade 3 agricultural land, it receives a significant negative effect with uncertainty, as the	No	Yes

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					housing types focusing on affordable and social housing.	GIS data does not distinguish between Grades 3a (classed as high quality) and 3b (not classed as high quality) agricultural land. Protection of agricultural land is also covered by policy EN16. Housing mix and affordable housing are secured by polices HS6 and HS7.		
D02.19	Rep'r Org. Agent	Emily Hrycan Historic England	Policy Site	Integrated Assessment	1. Historic England disagrees with the IA scores for a number of policies. In relation to the spatial vision which scores '+?' against IA objective 16b: Historic environment, the policy as drafted does not correctly refer to the historic environment/heritage assets as reinforced within national policy and legislation that is needed to manage these. 2. For the following policies, Historic England disagrees with the effects given in the IA against IA objective 16b: Historic environment, stating that the policy as drafted does not tie into the Local Plan, the HIA, and its content undertaken by the MOD/Council. - Policy SS3 (scores -?); - Policy SS4 (scores -?); - Policy SS5 (scores -?); - Policy HS2 (scores -?) (it also does not seek to enhance heritage assets and only mitigates harm); - Policy HS3 (scores -?); - Policy HS4 (scores -?); - Policy EC2 (scores 0?); - Policy EC3 (scores -?);	As explained in paragraph 6.5 of the IA (final bullet point), the spatial vision is considered to have a minor positive effect in relation to IA objective 16b: Historic environment, as it refers to the conservation of heritage assets in Central Lancashire. We explain in paragraph 6.7 that all the effects of the vision are subject to some uncertainty since their achievement will depend on the details of the Local Plan policies and site allocations which are designed to implement it (and have been appraised separately). The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are site allocation policies that generally allocate sites likely to have adverse effects on the significance and setting of the built and buried historic environment and so generally receive negative scores against IA objective 16b. Note that Policy SS4 receives a minor positive effect with uncertainty in	No	No

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			- Policy EC4 (scores -?); and - Policy EC5 (scores -?). 3. With regard to Policy HS6 which scores '0' against IA objective 16b: Historic environment, we disagree with the IA. The policy as drafted does not refer to the impact on the historic environment as reflected in national policy and legislation that is needed to manage these. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment. 4. With regard to Policy HS8 which scores '0' against IA objective 16b: Historic environment, we disagree with the IA. The policy as drafted does not correctly refer to the character and identity of the settlement and the historic environment. This is needed so that it reflects the policy and legislation that is needed to manage these. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment. 5. With regard to Policy HS11 which scores '+?' against IA objective 16b: Historic environment, we disagree with the IA. The policy as drafted does not correctly refer to heritage assets, a HIA, and other site policies. This is needed so that it reflects the policy and legislation that is needed to manage these.	relation to IA objective 16b. It is the policy-off appraisal of site 19P005 that receives the minor negative effect with uncertainty. Policy SS4 receives a minor positive effect because it requires sympathetic redevelopment of the site and the careful consideration of heritage and conservation requirements, following a detailed HIA. With regard to Policy HS2, the IA acknowledges in paragraph 6.129 that key considerations relating to the historic environment are only identified for 3 of the 37 sites allocated in this policy. Policy HS6 is considered to have a minor negative effect shown by the symbol '-' and not '0' against IA objective 16b. The policy will conserve the character, appearance and distinctiveness of the area, as well as encourage the protection of rural landscapes through promoting appropriate density outside settlement boundaries. However, it promotes high density development in Preston City Centre, which contains some of Central Lancashire's most sensitive heritage assets and so it could cause harm to these assets (paragraph 6.64). There is no need for the policies contained within the Local Plan to repeat national policy and legislation. Policy HS8 is found to have a negligible ('0') effect against IA objective 16b as it does not contain any wording regarding the historic environment and is not considered to have adverse effects on the historic environment. That is not to		

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			If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment. 6. With regard to Policy HS13 which scores '0' against IA objective 16b: Historic environment, we disagree with the IA. The policy as drafted does not correctly refer to avoiding harm to heritage assets or the historic environment. This is required so that it reflects the policy and legislation that is needed to manage these. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment. 7. With regard to Policy EC12 which scores '+' against IA objective 16b: Historic environment, we disagree with the IA. The policy as drafted does not seek to enhance heritage assets. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment. 8. With regard to Policy EN5 which scores '+' against IA objective 16b: Historic environment, we disagree with the IA. The policy as drafted incorrectly refers to enabling development and seeks to allocate land which may affect a designated heritage asset. If the Local Plan is amended as	say that additional wording would not result in positive effects. Policy HS11 is found to have a potential minor positive ('+?') effect against IA objective 16b. This is due to the fact the policy states that plots proposed in areas with sensitive heritage constraints should include a Design Code, supplemented by individual 'Plot Passports' setting out detailed design limitations. Additionally, custom and self-build houses must meet local design standards and characteristics (paragraph 6.99). Policy HS13 has a negligible ('0') effect against IA objective 16b. This is due to the fact that both sites allocated under this policy are pre-existing and so despite their proximity to heritage assets, effects on the historic environment will be limited (paragraph 6.111). Policy EC12 is considered to have a minor positive ('+') effect against IA objective 16b, as it requires Preston Markets to be protected and maintained as heritage assets, which will aid in conserving Central Lancashire's heritage assets and their settings(paragraph 6.211). Although the policy does not seek to enhance Preston Markets, IA objective 16b seeks to conserve and/or enhance heritage assets and their settings, so by protecting and maintaining Preston Markets Policy EC12 will have a positive effect on the achievement this objective.		

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			recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment. 9. With regard to Policy EN13 which scores '++' against IA objective 16b: Historic environment, we disagree with the IA. The policy as drafted does not include a locally specific strategic policy for the historic environment. It also incorrectly references the management of various elements of the historic environment. If the Local Plan is amended as recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment. 10. For the following policies, Historic England disagrees with the effects given in the IA against IA objective 16b: Historic environment, stating that the policy as drafted does not include reference to the historic environment. - Policy HC4 (scores 0); - Policy HC5 (scores 0); - Policy EN17 (scores 0); - Policy CC1 (scores 0); - Policy CC2 (scores +); and - Policy ID2 (scores -?). 11. With regard to Policy ID3 which scores '+/-' against IA objective 16b: Historic environment, we disagree with the IA. The policy as drafted does not seek to avoid harm to the historic environment. If the Local Plan is amended as	Policy EN5 is considered to have a minor positive ('+') effect against IA objective 16b, as it requires development to incorporate diverse green infrastructure that is appropriate to the local landscape and reflective and complementary of the historic character of the area (paragraph 6.401). Policy EN13 is considered to have a significant positive ('++') effect against IA objective 16b for a number of reasons. It requires proposals to conserve, enhance or better reveal the significant of an asset (including its setting), giving specific consideration to the siting/location, scale/height, layout and materials, and the re-instatement repair and/or revealing of features, elements and historic fabric, which contribute to the asset's significance and/or character and appearance (paragraph 6.436). The reasoning behind the effects identified for these policies is presented throughout Chapter 6 ('Integrated Assessment findings for the Pre-Submission Local Plan') of the IA. These are development management policies that do not generally contain any wording relating to the protection and enhancement of the historic environment. As such, most receive a negligible effect against IA objective 16b. Policy ID3 is found to have a mixed ('+/-') effect against IA objective 16b because		

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						recommended in my comments (see separate letter on the Local Plan), then the impact of this policy would be positive on the historic environment.	it states that development should not have an unacceptable impact on the historic environment unless it can be demonstrated that no technically acceptable alternative site is available, and the public benefits of the proposal outweigh the harm caused. Therefore, while the policy provides some mitigation there is still potential for some adverse effects (paragraph 6.537).		
D26.20	Rep'r Org. Agent	Ms Rachel Whitaker Natural England	Policy Site	Integrated Assessment		1. Chapter 3 – Sustainability context Baseline information Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment are considered where applicable to the plan area: - Green and Blue infrastructure strategies - Local Nature Recovery Strategies - Biodiversity plans and strategies - Rights of Way Improvement Plans - River basin management plans - National Landscape and National Park management plans. - Relevant landscape plans and strategies Please see the attached Annex A for our advice on sources of local plan evidence on the natural environment which was updated in 2025. 2. Key sustainability issues and likely evolution without the plan We highlight that the document has	Appendix B ('Review of policies, plans and programmes and baseline information') of the IA lists the policies, plans and programmes relevant to the Local Plan and IA. This includes plans and strategies of the type suggested by Natural England. We acknowledge in the 'Difficulties encountered' section of the IA that the number of policies, plans and programme documents and guidance produced by a range of statutory and non-statutory bodies means that it would not be proportionate or practicable for the IA to consider every potentially relevant document when establishing the policy context and baseline conditions. Instead, the IA sought to identify the key information relevant to the preparation of the Central Lancashire Local Plan and IA. The IA identifies key sustainability issues (Table 3.1), as this is one of the requirements of Schedule 2 of the SEA Regulations (Schedule 2). These can be interpreted as areas of opportunity,	No	No

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			focussed upon key sustainability issues but has not included reference to areas of opportunity which can also influence decision making and policies. We strongly recommend amendment is made. 3. In relation to Table 3.1, it is advised that the relevant IA objectives fully reflect IA11: Biodiversity and Geodiversity and policies referring to green infrastructure. It should be emphasised that designated sites and other biodiversity assets are increasingly vulnerable to changes in air quality, and climate impacts, requiring stronger protection. For quality of life, the plan should address unequal access to green space across different user groups. For the economy, greater emphasis is needed on supporting green jobs and skills to reduce unemployment and promote sustainable economic growth, highlighting the link between environmental and economic sustainability. 4. The alignment of relevant policies to include IA10: Air quality and IA11: Biodiversity and geodiversity is welcomed, although the relationship between the natural environment with Green Infrastructure and climate change resilience must be considered. It is advised to reference the specific statutory designated sites. 5. Natural England recommends the relationship between land and natural	where the Local Plan has the opportunity to address these issues. Appendix B ('Review of policies, plans and programmes and baseline information') of the IA contains a review of relevant policies, plans and programmes at international, national, regional/sub-regional and local levels for each baseline topic, with a summary provided at the end of the relevant aims and objectives, and therefore opportunities identified from that review (see headings throughout Appendix B). Additionally, Chapter 3 ('Sustainability context') considers and provides a summary of the implications of the review of national policies, plans and programmes (see green boxes) on the Local Plan and IA. The IA objectives were originally developed by the Central Lancashire Authorities from the analysis of international, national, regional, sub-regional and local policy objectives, baseline information and key sustainability issues identified in the plan area. They were presented in the IA Scoping Report and consulted upon with the statutory bodies, including Natural England, between August and October 2019. LUC reviewed these objectives and made some revisions to them, re-presenting them in the November 2022 IA Report consulted upon between		

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			resources and IA11: Biodiversity and geodiversity and climate change resilience is included. 6. Natural England welcomes the reference to Best and Most Versatile (BMV) land, although advises further consideration of any soils of high environmental value in light of their role in ecological connectivity. 7. Natural England support reference to the carbon storage that peat can provide, although it is advised to make an amendment to extend to wider peat assets. 8. Natural England do not support the principle of developing on peat and wish to see this reflected in Local Plan policy. 9. Whilst the development of brownfield sites is supported, it is noted that some brownfield sites are important for historic importance and wildlife, and as such the table [Table 3.1] should be updated to reflect the balance which must be met. 10. IA framework Natural England advise that Table 3.2 is largely generic and not specific to the Local Plan area. Appraisal criteria/sub-objectives should be added to the following objectives: IA3: Ensure that there is sufficient coverage and capacity of transport and utilities to support growth and	December 2022 and February 2023. Each IA objective covers a different topic but there is inevitably a lot of crossover between them. Some aspects of this comment relate more to the Local Plan than the IA. The purpose of Table 3.1 is to identify the key sustainability issues for Central Lancashire and likely evolution without the new Local Plan. Please see the response of (4) Please see the response of (4) Please see the response of (4) This comment relates more to the Local Plan than the IA. The purpose of Table 3.1 is to identify the key sustainability issues for Central Lancashire and likely evolution without the new Local Plan. The IA objectives against which the plan has been assessed were originally developed by the Central Lancashire Authorities from the analysis of international, national, regional, sub-regional and local policy objectives, baseline information and key sustainability issues identified in the plan area. As such, they were specific to the Local Plan area. They were presented in the IA Scoping Report and consulted upon (including with Natural		

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			development Natural England recommends that appraisal criteria/sub objectives be added to demonstrate commitment to designated sites such as "will air quality improve or have an insignificant effect on designated sites and other biodiversity assets?" 11. IA6: Support improved health and well-being of the population and reduce health inequalities We strongly recommend assessment criteria is created which references connecting people with nature and enhancing provisions of recreational resources & assets. Should baseline information indicate specific regions or group users which require more support or access this must be considered. Assessment criteria may include will it create, maintain or enhance local green space provision?, will it create an accessible open space for those groups identified as having deficient access?, will it create or enhance open space in areas which are deficient?, will it avoid impacts on the quality and extent of existing recreational assets, such as formal or informal footpaths? 12. IA10: Improve air quality Certain development proposals can affect the ability of the natural environment to adapt to climate change, including its ability to provide adaptation	England) between August and October 2019. As outlined in Appendix A ('Consultation comments'), changes were made to the IA at the time (including to the IA framework) in response to comments received from Natural England. LUC also reviewed these objectives and made some revisions to them, re-presenting them in the November 2022 IA Report consulted upon between December 2022 and February 2023. At this late stage in the process, the IA objectives are no longer subject to change. Natural England previously commented on the assessment criteria accompanying IA objective 6 at Scoping stage. They advised that the assessment criteria be updated to include access to the natural environment. The Central Lancashire Authorities added reference to the importance of access to the natural environment in response to this comment. At this late stage in the process, the IA objectives are no longer subject to change. Natural England previously commented on the assessment criteria accompanying IA objective 10 at Scoping stage. They advised that the assessment criteria be updated to include reference to the threats to designated sites which are air quality sensitive. The Central		

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			for people. Species may also find it difficult to move through fragmented habitat. As such, Natural England recommend that assessment criteria are added to demonstrate commitment to designated sites such as will air quality improve or have an insignificant effect on designated sites and other biodiversity assets? 13. IA11: Conserve and enhance biodiversity, green infrastructure and geodiversity assets This section of the table requires amendment to ensure all natural environment issues and opportunities are addressed. This should be tailored to the Plan area. We advise that this section could be strengthened by referring to the challenging issue which are specific to the designated sites. When referring to European and nationally designated sites, you may wish to draw on more detailed information on specific features from Designated Sites View, the Conservation Objectives and Site Improvement Plans. Further information at Designated Sites View (https://designatedsites.naturalengland.org.uk/) and Natural England's Impact Risk Zones (IRZ) on MAGIC maps (www.magic.defra.gov.uk) can identify potential development impacts. The Local Plan should aim to identify and pursue opportunities for securing measurable net gains for biodiversity.	Lancashire Authorities added reference to air quality sensitive areas in response to this comment. At this late stage in the process, the IA objectives are no longer subject to change. Natural England previously commented on the assessment criteria accompanying IA objective 11 at Scoping stage. They advised that the assessment criteria be updated to include reference to biodiversity net gain. The Central Lancashire Authorities added reference to biodiversity net gain in response to this comment. At this late stage in the process, the IA objectives are no longer subject to change. Green infrastructure is covered by IA objective 11, which covers biodiversity and geodiversity. The SEA Regulations require assessment of effects in relation to the following SEA topics: biodiversity, population, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage) and landscape, and the inter-relationship between these. There is a lot of crossover between the IA objectives and the assessment criteria provide a guide for the appraisal of options, identifying issues relating to the IA objective that should be considered where relevant. Given the large number		

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			This should include setting a percentage target level of provision of at least 10% net gain, higher targets should be supported by evidence. In order to strengthen this section, we recommend the following assessment criteria: - Will it protect, create and enhance the borough's biodiversity, geodiversity, and wildlife habitats in line with mandatory 10% Biodiversity Net Gain? - Will it protect and promote effective management of designated sites? - Will it align with Local Nature Recovery Strategy (LNRS)? - Will it encourage enhancement and restoration of designated wildlife sites, habitats and species and protected and unique geological features? - Will it promote the protection and recovery of priority species and habitats? - Will it ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not compromised? - Will it provide habitat connectivity? - Will it provide opportunity to restore and reconnect peat based habitats? - Will it remove an irreplaceable habitat or asset? 14. You may wish to consider green infrastructure under a separate IA objective. Our suggested assessment criteria coincide with comments made under IA6. Natural England's Green Infrastructure	of issues relating to each IA objective, it is not possible to list all those that are related and relevant and therefore the assessment criteria should not be considered to be prescriptive or exhaustive. In effect the criteria act as a starting point for the identification of effects and the appraisal work considers wider issues as appropriate. Natural England previously commented on the IA framework at Scoping stage. They did not comment on the wording of the assessment criteria accompanying IA objective 13. One of the criteria accompanying IA objective 13: Flood risk considers sustainable drainage systems. As noted above, at this late stage in the IA process when the assessment work has been iteratively undertaken over a number of years, there is no longer scope to amend the assessment criteria. Natural England previously commented on the IA framework at Scoping stage. They did not comment on the wording of the assessment criteria accompanying IA objective 14. At this late stage in the process, the IA objectives are no longer subject to change. One of the criteria accompanying IA objective 17: Resources considers peat. Natural England previously commented on the IA framework at Scoping stage.		

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			Framework provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). GI mapping resources are available here and here. These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision. 15. IA12: Ensure communities, developments and infrastructure are resilient to the effects of climate change This IA should also extend to the natural environment to reflect the proposed assessment criteria. The role of nature-based solutions should be referred to within this section. The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition, factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation. 16. IA13: Reduce the risk of flooding to people and property Sustainable urban drainage systems can	They did not comment on the inclusion of National Character Areas in the assessment criteria accompanying IA objective 16a (formerly referred to as IA objective 16). At this late stage in the process, the IA objectives are no longer subject to change. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, consideration is not given to the Green Belt in the IA. Natural England previously commented on the IA framework at Scoping stage. They did not comment on the wording of the assessment criteria accompanying IA objective 18. One of the criteria accompanying IA objective 17: Resources considers peat. It is not the role of the IA to make a commitment to no future commercial peat extraction. At this late stage in the process, the IA objectives are no longer subject to change. The proposed monitoring indicators were mostly taken from Appendix 2 of the Local Plan which lists the indicators used to monitor the Local Plan policies. The Council will work with Natural England throughout the examination stage to consider whether other monitoring indicators should be added		

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			be designed to have wildlife enhancing measures and the link to the natural environment should be made. You may wish to consider this within the assessment criteria. 17. IA14: Protect and improve the quality and availability of water resources Our water remit focusses on ensuring that habitats and designated sites are protected from water-related development impacts, which may also extend beyond a development's boundary (including peat-based habitats). Increased nutrients (including nitrogen and phosphorus) can cause eutrophication in fresh waters and estuaries. This causes harm to water dependent sites and wildlife. Excessive nutrients can come from wastewater, farming pollution & industrial processes. This can place sites in unfavourable condition, this means the area is not being adequately conserved and qualifying features of the site are not meeting targets. We also highlight the importance of nature based solutions. We suggest the following assessment criteria: will it minimise the risk of pollution arising from new development?, will it encourage water efficiency and promote the use of grey-water recycling / rainwater harvesting? 18. IA15: Increase energy efficiency, encourage low carbon generation and reduce greenhouse gas emissions	to the IA. Please see the response of (21) Please see the response of (21) Please see the response of (21) Please see the response of (21) Please see the response of (21) Please see the response of (21) Please see the response of (21)		

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			We strongly recommend assessment criteria are created for peat. This may include will it protect peat resources? Will it result in the loss of peat? Will it result in the enhancement of peat? 19. IA16a: Conserve and/or enhance landscape, townscape, in addition to the local character and distinctiveness of the CLLP area Designated landscapes should be given great weight to conserving and enhancing designated landscapes such as Areas of Outstanding Natural Beauty (AONBs). These can be informed by landscape character and sensitivity assessments. We are also aware that the Forest of Bowland is in the process of creating a new 5 year Management Plan for the AONB, using recently published guidance. We advise you should have regard for this emerging Management Plan throughout your plan preparation, to ensure that your plan is based on the most up-to-date information. Natural England strongly support the emphasis on beauty, placemaking, access to nature and good design. Nature and green infrastructure are integral to creating and maintaining high quality, beautiful places and should be fully embedded into local design codes. We would also expect reference to National Character Areas (NCAs) within the assessment criteria.			

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			You may wish to consider associated assessment criteria of will it protect, maintain and enhance local character and distinctiveness?, will it lead to further light pollution?, will it affect areas of tranquillity?, will it follow design codes? Plan policies and proposals should all positively enhance land within the Green Belt. This should include compensatory improvements to environmental quality and accessibility of remaining Green Belt where land is removed from the Green Belt. Green Belt land can often be degraded 'urban fringe' landscapes. Therefore, there will be opportunities to 'green' the Green Belt and deliver environmental benefits such as landscape enhancement, habitat creation and enhancement and improved access to nature. As such we would expect associated assessment criteria. 20. IA18: Promote sustainable consumption of resources and support the implementation of the waste hierarchy We recommend the following assessment criteria: will it safeguard existing supply of natural resources?, will it encourage a reduction in the amount of waste produced?, will it encourage increased recycling and composting and achieve the diversion targets for waste away from landfill?, will it result in improvement in the management of fly tipping?			

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			Natural England would support an assessment criteria question which committed to no future peat extraction as a commercial operation. 21. Chapter 8 – Monitoring Natural England welcome that that each IA objective has a proposed monitoring indicator. However, some measures appear to be more generalised. Bespoke indicators should be chosen relating to the outcomes of development management decisions. Natural England highlight monitoring indicators must quantify the success of the sustainability objectives and criteria. Typically, indicators are specific, measurable, accepted, realistic and time bound. As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117). Whilst it is not Natural England's role to prescribe what indicators should be adopted, we have provided example monitoring indicators in the sections below. IA6: Support improved health and well-being of the population and reduce health inequalities Other general monitoring indicators may include: percentage of people who will utilise social prescribing; percentage increase of local green spaces; percentage of the plan areas population			

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			having access to a natural greenspace within 400 metres of their home; length of greenways constructed; hectares of accessible open space per 1000 population; number of new and retrofitted urban green infrastructure, such as living roofs, living walls, planters. 22. IA10: Improve air quality Monitoring indicators may include: Recognising the value of nature-based solutions, such as: Number of trees planted, Hectares of flood plain; Percentage increase in green space; Area within plan area enhanced through Biodiversity Net Gain; Hectares of peat engaged in restoration efforts; Hectares of trees planted and enhanced; Number of tonnes of NOx emitted annually from road transport. 23. IA11: Conserve and enhance biodiversity, green infrastructure and geodiversity assets Monitoring indicator examples include: number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance; percentage of major developments generating overall biodiversity enhancement; net gain in biodiversity using the DEFRA metric. Green infrastructure general monitoring indicators may include: percentage of people who will utilise social prescribing; percentage increase of local green spaces; percentage of the plan area's			

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			population having access to a natural greenspace within 400 metres of their home; length of greenways constructed; hectares of accessible open space per 1000 population; number of new and retrofitted urban green infrastructure, such as living roofs, living walls, planters. 24. IA12: Ensure communities, developments and infrastructure are resilient to the effects of climate change Monitoring indicators may include: Recognising the value of nature-based solutions, such as: Number of trees planted, Hectares of flood plain; Percentage increase in green space; Area within plan area enhanced through Biodiversity Net Gain; Hectares of peat engaged in restoration efforts; Hectares of trees planted and enhanced; Number of tonnes of NOx emitted annually from road transport. 25. IA14: Protect and improve the quality and availability of water resources Monitoring indicators may include: number of planning applications which have met net neutral aims, percentage of relevant development incorporating SUDs and water quality/ecological status of rivers. 26. IA15: Increase energy efficiency, encourage low-carbon generation and reduce greenhouse gas emissions Monitoring indicators can include: hectares of peat in restoration; number			

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			of planning applications on peat; hectares of peat lost or retained. 27. IA16a: Conserve and/or enhance landscape, townscape, in addition to the local character and distinctiveness of the CLLP area We advise monitoring indicators include reference to AONBs, NCAs, light, tranquillity and design codes. 28. IA18: Promote sustainable consumption of resources and support the implementation of the waste hierarchy Monitoring indicators may include: tonnage of waste diverted from landfill; number of recycling facilities.			

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zz						Count of Representations against this policy/section:		1
D02.10	Rep'r	Emily Hrycan	Policy	zz	DELETED REP - DUPLICATION	DELETED REP - DUPLICATION	No	No
	Org.	Historic England	Site					
	Agent							