

## MATTER 7.

1. I am concerned about the current apparent 'loophole' with lack of Biodiversity 'net gain' in 'self build' dwellings in in the Biodiversity and Ecology section of the CLLP proposals and that the 'loophole' can be closed by the proposals suggested in the plan.

MHCLG originally proposed 'self-build' dwellings to be constructed in order to encourage development, however in the current Biodiversity & Ecology emergency with England being the most nature depleted country of the four nations of the UK and also in Europe, it is more essential than ever that the 'loophole' is closed.

2. In the Central Lancashire Local Plan, policy HS8 specifically acknowledges that certain areas could be considered appropriate for Rural Exception Sites to enable the development of affordable housing to meet local needs. However in my opinion in what constitute country lanes in rural areas, there have already been excessive dwellings constructed on the basis of 'infill' development according to Greenbelt Regulations in the National Planning Policy Framework (NPPF) from Permission in Principle (PIP) despite the fact that PIP should only apply in residential areas, not in the Green Belt (according to my understanding of PIP). Such housing should be incorporated into larger scale developments.

Therefore my concern is that it would be inappropriate to release additional land in any rural area for truly affordable and social housing in Green Belt (even Green Field) rural areas where an agricultural land assessment would apply anyway. The general principles of a "rural exception site," as outlined above, are guided by national planning policy (the NPPF), but the specific criteria and implementation details (such as those in a local policy like HS8) are determined by the local planning authority.

3. a) Does Policy HS13 provide an adequate framework to ensure the need for accommodation for Gypsy and Travellers and Travelling Show people can be met as required by national policy? Is the Central Lancashire Gypsy and Traveller and Travelling Show people Accommodation Assessment 2024 Update robust in its identification of needs for pitches and plots?

To my knowledge, there are no such sites officially set aside in the SRBC region or anywhere else in Central Lancashire area. This is an issue which should be addressed.

4. Regarding the construction of truly affordable and social housing as directed by MHCLG, I would suggest that this becomes a mandatory part of the Central Lancashire Local Plan for developers. There is a conspicuous lack of such housing in the SRBC regional area, instead there are many preposterously expensive and 5/6 bedroom dwellings already constructed, in an era of a declining birth rate, which seems illogical and unnecessary. .

Also such dwellings are classified as so called 'Windfall' developments and are not incorporated into SRBC housing numbers, therefore the combination of these dwellings with existing housing numbers would satisfy MHCLG requirements.