

**ALL REPRESENTATIONS RECEIVED UP TO AND INCLUDING 24 OCTOBER 2012**

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
1	1	Chapter C - Policy C3 - Site W	<p>We are writing with reference to the proposed development site W on your map, plot surrounded by Moss Lane, Flensburg Way, Heatherleigh and Croston Road. We feel that developing the site with a proposed 650 homes and any relevant amenities would be the final straw for us as we moved to Leyland 11 years ago to a lovely tranquil spot which admittedly has already been marred by the stench from the non-smelling waste plant! We feel the proposed development will potentially:</p> <ul style="list-style-type: none"> <li>- spoil any views currently enjoyed</li> <li>- cause a lack of privacy by being overlooked</li> <li>- increase the general noise level</li> <li>- have a detrimental effect on wildlife</li> <li>- increase traffic on a very busy bypass</li> </ul> <p>There are many new homes available on development areas in and around Leyland which appear to be struggling to sell so why is it deemed necessary to build 650 homes in this area?</p> <p>We request to be sent any information regarding the proposed development in our area, ie outcome of government decision next April, any interim consultation and future masterplans produced, as we will no doubt want to object to them. We are happy to receive any information by email to avoid any postage cost.</p> <p>Thank you for your attention in this matter.</p>
2	3	Proposals Map	<p>Bell Ingram acts on behalf of Essar Oil (UK) with regard to monitoring the progress of Development Plans along the route of the NW Ethylene Pipeline, which extends from Grangemouth in Falkirk to Stanlow in Cheshire and passes through the South Ribble Borough Council area. The NW Ethylene Pipeline is operated by Essar Oil (UK) and is a significant Pipeline asset of strategic importance in the supplies of oil and gas from the North Sea. The North West Ethylene Pipeline is classified by the Health and Safety Executive as a major accident hazard pipeline (MAHP) and as such is subject to land use planning constraints.</p> <p>Our client has instructed us to bring to the Council's attention any matters which could affect their pipeline interests. Having reviewed the Publication Version, including the Proposals Map, we note that no reference has been made to the North West Ethylene pipeline as a land use planning constraint. We recommend that careful consideration is given to the including the North West Ethylene Pipeline as a constraint on the Proposals Map to usefully inform any future land allocations.</p> <p>For clarification, I have enclosed a copy of the up-to-date map of the pipeline route (Nos 16) for the South Ribble Borough Council area. We would also wish to draw your attention to the fact that the pipeline varies along its route between Standard and Heavy Wall sections. Please be aware that we issued this information to you previously in our letter dated 19 September 2011.</p> <p>On behalf of Essar Oil (UK), it is requested that your Council also checks all existing and proposed site allocations against these maps to ensure that our client's pipeline interests are protected. We can also provide the maps in GIS format for inclusion in the Council's own system. If you require these please contact Robin Palmer at r.palmer@greystaruk.com.</p> <p>Please contact myself in the first instance should you require any further information or should you wish to discuss the matters raised in this letter in any more detail.</p> <p>In the meantime, I would be grateful if you could acknowledge receipt of this letter and information at the earliest opportunity.</p>
3	6	Chapter D - Policy D1 - Site S	<p>I have read the document "Preferred Options Site Allocations and Development Management Policies Development Plan Document Nov/Dec 2011". With reference to "Land Off Brindle Road, Bamber Bridge sections 7.52 to 7.55 " page 37. Although I understand, having met Mr. David Porter of S.R.B.C. the housing plan has been reduced from 375 down to 250 dwellings this still gives me great concern the affect of at least another 250 vehicles a day using The Hospital Inn level Crossing/junction.</p> <p>As you will know, the Bamber Bridge area has grown enormously since the 1950's. There are now 3 major motorways , new housing developments and industrial sites all about the Bamber Bridge area. The Hospital Inn level Crossing/junction , however seems to be constantly over looked. As local maps can prove this crossing/junction has not change in over 150 years and yet more and more traffic use the crossing/ junction to gain access to either the motorway net works or Walton Summit, which at the last count employs circa 5,000 people.</p> <p>It is therefore my belief that a study is done to assess the crossings capacity to take yet more traffic BEFORE any further developments either housing or industrial are under taken.</p> <p>Although I make reference to the land off Brindle Road I would like to add the document mentioned above does include other developments in the Bamber Bridge area that will add further to the traffic pressure placed on the Hospital Inn Crossing/junction.</p> <p>I hope that the above can be taken into account before any final proposals of developments are forged and I look forward to receiving your response.</p>
4	4	Chapter C - Policy C2 - Moss Side Test Track	<p>We have responded to earlier versions of the DPD for South Ribble.</p> <p>We have viewed the new Local Plan for the Borough, with particular reference to the proposed development of the Moss Side Test Track site.</p>

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			<p>We live at 143 Longmeanygate and the boundary of our property backs onto the Test Track site. We have lived here now for nearly thirty years.</p> <p>In the latest plan we are glad to see that the Green Belt is preserved and that a green corridor has been designated around what is now the test track. What we cannot understand, however, is why a strip of the present green area, virtually all around the outside of the track, has been incorporated into the brown area set for development. Given the Council's commitment to protecting and enhancing the environment, surely there is enough area to develop without having to cut down the trees in this small belt?</p>
4	7	Chapter C - Policy C3 - Site W	We also wonder if the whole of the area labelled W, which we believe is presently farm land, has to be built on. Is it not possible to leave a green corridor along the road to enhance people's environment when driving into South Ribble? We are also unsure what an "area of separation" means. This again is farmland. Is this also going to be built on at some stage?
6	8	Chapter G - Policy G7	We would suggest that Policy G8 be changed to read “. . . natural resources, bio- and geodiversity.”
6	9	Appendix 7	<p>Appendix 7 Nature Conservation Sites – add the current Geological Heritage Sites alongside the Biological Heritage Sites as follows:</p> <p>Roach Bridge Bannister Hall Weir Penwortham Bridge – this straddles the boundary with Preston City</p>
7	10	General	On this occasion I can advise you that the Trust has no specific comments that it wishes to submit.
8	11	Chapter C - Policy C3 - Site W	I don't know why you bother to put plans on show in South Ribble as they are always ignored. People in Croston Road and other places strongly objected to the waste plant, but were ignored. Now you want to spoil things again. The plans you have will spoil our view over fields, destroy wildlife and will make the bypass worse that it is now, will also increase traffic on our road and what about our privacy? Think again.
8	103	Chapter C - Policy C3 - Site W	<p>I strongly object to the proposed 'Masterplan'. The proposal will bring about increased road traffic which will severely compromise road safety in the area.</p> <p>In the area there is a significant amount of wildlife. The proposal is likely to have a detrimental effect on the wildlife in the area due to the increased noise and air pollution.</p> <p>Currently the Croston Road area of Farington is a desirable location to reside. Many of the properties benefit from open land to the rear. The proposal will without doubt reduce the desirability of the area and the value of the homes.</p> <p>As a resident of this area we have already been subjected to the development of a waste disposal facility near to the area. This has already had a huge impact on the value of properties within this area and the 'Masterplan' would only double the impact and further reduce the value.</p>
9	12	Chapter D - Policy D1 - Site Y	<p>Paragraphs 7.56, Page 40</p> <p>This section states that the Walmer Bridge Village Plan supports residential use of the above site. We refer to our letter of 12 January 2009, responding to the Central Lancashire Local Development Core Strategy – September 2008. This letter clearly states a preference for mixed use – including SOME housing. The Village Plan has never stated the desire for this site to be used solely for residential use.</p> <p>Please can you ensure that any reference to this is deleted from future documents?</p> <p>(FILE NOTE: Please also see letter from Parish Council 12/1/09)</p>
10	13	Chapter G - Policy G4 - adjoining Site Q	<p>At present, this land is classed as 'dark green' for planning purposes. I feel this is an appropriate site for residential development purposes and request that this request is considered and the land should be allocated for residential purposes as the adjacent land is currently being considered subject to planning approval (access via Chapel Meadow).</p> <p>I would not be averse to discussing a quota above current legislative requirements for affordable housing. Having lived in the village for most of my life, I feel strongly that many families and young people have to move out of the area as they cannot afford to purchase/rent property locally. If this site can improve this situation, I would be interested in discussing further with the relevant parties.</p>
11	15	Habitats Regulations Assessment	<p>Thank you for your recent consultation with regard to the above. Fylde Borough Council has no formal comments to make on the document.</p> <p>However the Council is pleased to note that, under reference to the Habitats Regulations Assessment in paragraph 2.26, the document refers to the fact that it is important to ensure that sites and policies identified in the DPD do not detrimentally affect designated areas such as the Ribble and Alt Estuary Special Protection Area and Ramsar site which crosses our adjoining boundaries.</p>
11	16	Chapter G	The Council is also pleased to note that Chapter G, paragraph 10.20, refers to the fact that all sites with international, national and local environmental designations are recognised by the Central Lancashire Core Strategy and are given a level of protection from any adverse impacts of development through Core Strategy Policy 22.
12	17	Chapter C - Policy C3 - Site W	There is no established need for additional housing in this area. There are a large number of properties being offered for sale by local estate agents, many of which have been for sale for a considerable time and are at reduced prices and available immediately.

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			<p>The increased population nationally is due to uncontrolled immigration in recent years. As it is government policy to control immigration in future, and the average family size is falling for the indigenous population is falling (less than two children per couple) it is unlikely that a big increase in housing will be required in the long term.</p> <p>As the name implies, Farington Moss is a very wet area and there have been large areas of standing water for most of the year. This problem will be exacerbated if a large area is covered in concrete.</p> <p>The extra houses will probably mean an extra 500 cars. Flensburg Way is already congested at peak hours.</p> <p>The site is very attractive countryside and agricultural land. It is a valuable source of food and a haven for wildlife, it is particularly useful for country walks due to its proximity to the town centre.</p> <p>The large number of trees and other plant material absorbs large amounts of carbon dioxide that is thought to cause climate changes.</p> <p>There is already significant unemployment in the area due to the loss of manufacturing capacity – Royal Ordnance Chorley, British Leyland, Leyland Paints, Leyland Rubber, etc. Additional housing would be bound to increase the number of people seeking employment in the area</p>
13	19	Chapter G - Policy G4 - between sites X/M & Q	<p>Land to the south of Chapel Lane, Longton – to the rear of Whitehall Farm and Laburnum and land to the south of Chapel Lane, Longton – between Whitehall Farm and Laburnum.</p> <p>All land presently allocated as G4 “Protected Open Land”. Suggest land should be re-allocated D1 “New Residential Allocation” as indicated V, X, M and Q on plan using former railway line as natural development boundary.</p> <p>Application for 2 no detached dwellings similar to previously approved and developed site for 2 no dwellings to west on Chapel Lane.</p> <p>Extract from Plan attached with areas annotated.</p> <p>Details of current land owner and applicant included</p>
14	21	Chapter C - Policy C3 - Site W	<p>I am raising objection to the proposed extension of the Policy C3 site Map Ref.W Land north of Heatherleigh, from Bannister Lane, further North to Moss Lane. This is referenced in the SRBC document “Changes from PO to Publications Stages 020712”.</p> <p>Not enough consideration is being given to the use of Brownfield sites to meet the borough’s housing needs, having allocated the Greenfield site adjacent (between Heatherleigh and Bannister Lane), this is a further, permanent, Greenfield site loss. The development of the full 40Ha will complete the urbanisation of a previously rural area. The Site Allocation document itself defines the use of the site as “Not a sustainable use of resources”.</p> <p>Access to the north of proposed site is quoted as Moss Lane. This is for the most part a single track lane without pavement, and not suitable to serve a residential area of the proposed size. Road infrastructure changes would therefore be required around the entire site, not just to Moss Lane, but Croston road, Bannister Lane and any new entry/exit route onto Schleswig Way.</p> <p>I do not believe the Borough Council has done enough to inform the affected local residents of the allocation and of the current status of the proposal, and its amendment. It is not unreasonable to expect as a council tax payer, to be involved, or at least informed, of matters that will directly impact one’s quality of life. Perhaps using the council’s own Forward magazine could give at least a quarterly view of any consultations of interest.</p>
15	22	Chapter G - Policy G4	I agree to the G4 policy relating to Protected Open Land contained in the 15 year development plan.
16	23	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
17	24	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
18	25	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
18	615	Chapter G - Policy G4	I agree the G4 policy relating to Protected Open Land contained in the 15 year development plan.
19	26	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
20	27	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
21	28	Chapter G - Policy G4	G4 Policy
22	29	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
23	30	Any	[No comments entered on form]
24	31	Chapter G - Policy G1e	We wish to express our dissatisfaction with the reply we received from SRBC’s Planning Department to our letter of 30/11/11 as it fails to acknowledge a number of significant issues raised, especially in relationship to the Central Lancashire Development Framework. We were led to believe that the SRBC Local Framework had to fit within the policies of Central Lancashire and would like confirmation of this.

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			<p>In our letter, we make reference to Central Lancashire Policies 21, 12, 27 and 28, but your reply does not refer to them in any way, even though they are very significant to changes proposed in policy G1(e).</p> <p>We have no objection to forms of renewable energy in Green Belt in the form of solar panels or hydroelectricity but object to commercial enterprises involving engineering structures such as wind turbines or waste energy plants. It should be made clear to developers that applications for commercial wind turbines in the Green Belt are not acceptable and this would save a considerable waste of time and money on applications that are contrary to national, county and local policy.</p> <p>Recently there has been a planning application for a 24.8 metre wind turbine at Flag Lane, which is in Safeguarded Land. At the first planning meeting, the application was rejected by nine votes to three. The applicant reapplied and the application was refused by thirteen votes to nil. There were 400 objections to the application. The SRBC Planning Officer's recommendation was for refusal, giving the following reasons "The development, by virtue of its size and proximity to neighbouring residential properties, would have a detrimental impact on residential amenity in terms of appearing overbearing and be detrimental to the character and appearance of the rural area, contrary Policy QD1 criterion "a" and ENV26 criterion "a" and "b" in the South Ribble Local Plan and Core Strategy Policy 28.</p> <p>If so much protection was given to an application in Safeguarded Land, how much greater the need to protect the Green Belt from such inappropriate development. It is appreciated that in certain circumstances Safeguarded Land is given the same status as Green Belt, which only reinforces the argument that commercial wind turbines are not appropriate in the planning policy G1.</p> <p>Last year there was a planning application for four wind turbines in the Moss area of Hoole. There was considerable objection to this commercial enterprise within the Green Belt and over 200 people attended the first protest meeting in Walmer Bridge Village Hall and over 300 letters of objection were sent to the Planning Office. This application has been withdrawn and should not be encouraged to re-apply if changes are made to the current D5 Policy by introducing item (e) in the new G1 Policy. This application was not only contrary to the same planning policies, which resulted in the refusal of the Flag Lane application, it also contravened National Policies for the Green Belt and the Central Lancashire Policy 21 – Landscape Character Areas, as the area is referred to by name.</p> <p>Currently there is an application for a 34.2m wind turbine at Coxhead's Nursery in New Longton. This is taller and noisier than the Flag Lane application and contravenes the same local policies as well as Policy 21 and the National Planning Policy for Green Belt (SN/SC/934).</p> <p>Apart from failing to meet the request Planning Policies, all three planning applications have the following in common.</p> <p>a) They all pretend to possess green credentials, whilst they are noisy, obtrusive engineering developments.  b) They are commercial enterprises that only require 25% to 30% of their output for their own use. The remainder being a source of income from sales to the grid.  c) They have been strongly opposed by the local community.  d) They are sited far too close to residential property, as accepted by responsible authorities.</p> <p>In our letter we refer to the fact that Policy G1(e) contradicts the essence of National Policy PPG2 and in your reply have stated that PPG2 has now been replaced. We have examined the new National Planning Policy Framework section related to the Green Belt and have found that this is not different to PPG2, in that "engineering operations" are considered in appropriate. Planning Inspectors have defined in numerous appeals, that commercial wind turbines are "engineering operations" and unacceptable in Green Belt.</p> <p>We have participated in every consultation process since 2006, of Central Lancashire and South Ribble and believe we have the right to a response that deals with the issues raised.</p> <p>We believe that the Local Plan should reflect the wishes of the people in preserving what they wish to preserve and developing a common vision for the future. The inclusion of item (e) in G1 does not do this, and therefore we shall be making a formal "Representation" for its removal or at least a rewording that does not encourage inappropriate and unwanted development.</p>
24	42	Chapter G - Policy G1e	<p>Thank you for your letter of 25 July 2012. There now appears to be a way forward that would clarify allowable developments within the Green Belt that would not conflict with either the National Planning Framework, the Central Lancashire Core Strategy or the wishes of the residents of South Ribble.</p> <p>(a) As stated in your letter, section 91 of the National Planning Policy Framework (NPPF) is the relevant to Renewable Energy and the Green Belt. This policy makes the point that certain types of renewable energy should not be developed within the Green Belt. To quote, "When located in Green Belt, elements of many renewable energy projects will comprise inappropriate development".</p> <p>(b) We are pleased that the Central Lancashire Core Strategy is in place especial as we made special reference to a number of policies in our original letter of the 30/11/2011. In your letter, you refer to Policy 28, as justifying item (e) in Policy G1. We find this confusing as one of the reasons given by your Planning Department for refusing planning permission for a wind turbine at Flag Lane, was that it did not meet the requirements of Policy 28. To quote, "The proposal would have an unacceptable impact on the landscape character and visual appearance of the local area, including urban environment". Policy 28 applies certain criteria and they should be recognised when related to Policy G1.</p> <p>(c) As the Local Plan should not run contrary to the Central Lancashire Core Strategy. We made special reference to Policy 21 "Landscape Character Areas as this includes Longton, Walmer Bridge, and the moss lands at Hoole and Farington. These areas also lie in the Green Belt and would be affected by Policy G1(e). This Policy states "New Development will be required to be well integrated into existing settlement patterns, appropriate to the landscape character type and designation within which it is situated and contribute positively to its conservation, enhancement or</p>

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			restoration or the creation of appropriate new features". Any form of commercial wind turbine would fail to meet the requirements of this Policy.  It has been suggested by our MP, Lorraine Fullbrook, that in order to bring clarity to Policy G1(e) and prevent unwanted and unnecessary planning applications for commercial wind turbines in the Green Belt, that a Supplementary Policy is produced to make this clear and we would like you to respond to this request.
24	613	Chapter G - Policy G1e	LATE SUBMISSION - RECEIVED 29/8/12  Within the Western Parishes information of common interest to local organisations is readily exchanged and a copy of your letter to Lorraine Fullbrook MP dated 9/8/12 came to our attention.  We were greatly disturbed by its contents, for having brought to the attention of Ms Jeni Barnes of your Forward Planning Department (30/7/12), that Policy G1(e) was not in line with the National Planning Policy Framework, no mention of this is made in your letter. In fact your letter gives a divergent view of supporting all renewable energy proposals within the Green Belt.  To quote, "The National Guidance, the NPPF, supports all renewable energy proposals, including wind turbines, subject of course to certain criteria being met. The Site Allocations DPD has to comply with this national policy.  The point we wish to raise is that Policy G1 relates to the Green Belt and allowable development. It is therefore necessary that this conforms with the correct National Policy. The correct National Policy is the NPPF, Policy 91, which is related to the Green Belt and its Development (Standard Note SN/SC/934). This Policy states "When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if the project is to proceed."  Even though the production of renewable energy may be permissible in Green Belt, such as solar panels and hydroelectric schemes, the policy makes it clear that forms of renewable energy that would conflict with concepts of the Green Belt would not be acceptable. Wind turbines with their high engineering structures and noisy whirling blades "will compromise inappropriate development".  We would remind you, that a great deal of Green Belt related to the Western Parishes also is controlled by Policy 21 of the Central Lancashire Core Strategy – Landscape Character Areas and as such is not suitable for wind farm installations.  In its current form G1(e) has already been the cause of 4 inappropriate applications for wind turbines and the need for either its removal or the addition of a Supplementary Planning Document is essential.  Would you please advise us as to what progress is being made on this issue.
25	32	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
26	33	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
27	34	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
28	35	General	Having reviewed your document, I confirm that we have no specific comments to make at this stage.
29	36	Chapter C - Policy C3 - Site W	I submitted comments in December 2011 as part of the initially feedback detailing my objections to the proposed development of this area. I stand by and maintain these comments, your responses to which do not change my views.  In your recently published documents, there are one or two respondents comments in support of these proposals. These are a small number of residents who see the proposed development as an oppurtunity to cash in and move away from the area. They have no interest in what is left behind for the rest of us who love living on Bannister Lane because of the nature of the surroundings.  You have been unable to demonstrate a need for additional housing accommodation in this area. Over recent years there has been considerable residential development on the likes of Heatherleigh, Barn Hey Drive, the former BTR works and of course the ongoing massive site at Buckshaw Village.  This has put huge pressure on the existing infrastructure as it is. What are your proposals to upgrade highways and drainage, provide additional health care facilities and schools to deal with the increase in population and all their demands? Increasing the population of the area will only serve to increase the number of unemployed or the number of cars on the road for people to commute out of the area to work as there is no generation of new business or industry in the area to support additional employment.  This area is Moss land, densely planted with trees which assist in the reduction of greenhouse gases. What damage are you doing to the environment by clearing these areas of trees and adding between 600 and 1200 more cars into the area? How does this sit with the Council's environmental policies?  Look around the estate agents in Leyland and see the mass of unsild property available in the area. Please advise what research has been done to calculate and ascertain the need for such a massive amount of additional residential property in the area. I would request your specific and detailed responses to these points as I and the majority of other residents of this area do not find any validity in these proposals.



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			I reiterate my whole hearted objection to these proposals.
29	582	Chapter C - Policy C3 - Site W	<p>Further response following Lea Hough consultation event - received by email.</p> <p>I am a resident of Bannister Lane, Farington Moss, and have received through the post the attached development proposal from LeaHough Chartered Surveyors in connection with the above site.</p> <p>All the residents are alarmed that this proposal includes the following which you have either stated in writing, or advised at meetings, would not be permitted :</p> <ul style="list-style-type: none"> <li>- Access off Bannister Lane</li> <li>- Construction of affordable housing</li> <li>- Construction of apartments</li> </ul> <p>Please confirm by return that the LeaHough proposals will be rejected on these grounds.</p>
30	37	General	<p>West Lancashire Borough Council considers the South Ribble Site Allocations Publication Version DPD to be sound.</p> <p>The Council made four representations to SRBC at Preferred Options stage, two in support of the draft plan, one commenting on the "Trampower" proposals, and one expressing concern over the lack of a site for Gypsies and Travellers.</p> <p>Having considered the SRBC responses to our representations, along with the changes to the wording of the SADPD with regard to the Trampower proposals and Gypsy sites, West Lancashire Borough Council considers that its concerns have been satisfactorily addressed in the Publication Version of the site Allocations DPD, and that it has no further issues with the emerging DPD.</p>
31	38	Chapter E - Policy E1	Would like to make a comment that the revised plan to unallocate the land on Kellett Lane as employment status is good news in light of traffic problems in area and also the fact that many units are empty or up for let on Walton Summit and sceptre nearby. Would not make sense in current climate to develop.
32	39	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
33	40	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
34	41	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
35	43	Chapter C - Policy C2 - Moss Side Test Track	<p>Horse count survey 2012 – South Ribble and surrounding area</p> <p>Over the last few weeks, the Bridleways Group have carried out an extensive survey in and around the South Ribble area, but most especially close to the Test Track on Moss Side, Leyland.</p> <p>The purpose of this exercise was to ascertain exactly how many horses are currently stabled in the area, and which could, at any given time, be ridden on the local highways.</p> <p>We appreciate that new housing will come to the area, and with it more vehicles. As our local roads become increasingly busy, the safety of our local riders and other road users is paramount.</p> <p>Horse riding was, and still is viewed by many as a minority sport for the 'well off'. From our survey it is quite obvious that this is not the case and riding is now increasingly popular and growing as farms diversify, providing stabling which is accessible to all. With the influx of new people to the area will come additional equestrians and more horses in South Ribble.</p> <p>Since our last horse count, which was not as detailed, numbers have risen from in the region of 250 in 2003 to over 450 in 2012.</p> <p>For the purposes of our survey, we have not included stables across the other side of the A59, except three who asked to be included. Should we have gone further afield there are a number of larger livery yards in the Longton/New Longton areas which could have added in the region of another 100 to our count.</p> <p>We particularly target local yards and private owners that we know regularly hack in and around the local roads and tracks.</p> <p>From our survey, the main feedback we received was that more off road riding, eg incorporation of routes within the test track site and developments adjacent to Schleswig Way was essential to promote this growing sport in a safe environment.</p> <p>This is an issue that needs to be addressed as part of the LDP and not tagged on as an 'afterthought'. Infrastructure of multi-use paths/bridleways must be included at an early planning stage to maximise the use of Section 106 monies which are set aside for purposes such as this.</p> <p>At a time when we are being told by Government to exercise and stay healthy, support for this project must be encouraged by our local council.</p> <p>As a registered charity, the Bridleways Group are actively raising money to support any new ventures that will provide for safer riding for our local equestrians. We are affiliated to the British Horse Society and work actively with groups throughout the country, promoting safe and courteous riding.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
35	223	Chapter C - Policy C2 - Moss Side Test Track	<p>I am a resident local to the Test Track and have been for 26 years.</p> <p>I am also the Secretary of the Ulnes Walton Bridleways Association and have been since its inception in 2003. The group was formed following a number of near collisions and finally the death of a horse on our local roads. Luckily the rider escaped serious injury.</p> <p>Since then, we have achieved charitable status, and obtained a number of grants, which together with our own fund raising initiatives, have gone to raise awareness in the locality, of safety for equestrians on our increasingly busy roads. We are also active in creation and maintenance of off road routes in the area.</p> <p>Summary</p> <p>Over the last few weeks, the Bridleways Group have carried out an extensive survey in and around the South Ribble area, but most especially close to the Test Track on Moss Side, Leyland.</p> <p>The purpose of this exercise was to ascertain exactly how many horses are currently stabled in the area, and which could, at any given time, be ridden on the local highways.</p> <p>We appreciate that new housing will come to the area, and with it more vehicles. As our local roads become increasingly busy, the safety of our local riders and other road users is paramount.</p> <p>Horse riding was, and still is viewed by many as a minority sport for the 'well off'. From our survey it is quite obvious that this is not the case and riding is now increasingly popular and growing as farms diversify, providing stabling which is accessible to all. With the influx of new people to the area will come additional equestrians and more horses in South Ribble.</p> <p>Since our last horse count, which was not as detailed, numbers have risen from in the region of 250 in 2003 to over 450 in 2012.</p> <p>For the purposes of our survey, we have not included stables across the other side of the A59, except three who asked to be included. Should we have gone further afield there are a number of larger livery yards in the Longton/New Longton areas which could have added in the region of another 100 to our count.</p> <p>We particularly target local yards and private owners that we know regularly hack in and around the local roads and tracks.</p> <p>From our survey, the main feedback we received was that more off road riding, eg incorporation of routes within the test track site and developments adjacent to Schleswig Way was essential to promote this growing sport in a safe environment.</p> <p>This is an issue that needs to be addressed as part of the LDP and not tagged on as an 'afterthought'. Infrastructure of multi-use paths/bridleways must be included at an early planning stage to maximise the use of Section 106 monies which are set aside for purposes such as this.</p> <p>At a time when we are being told by Government to exercise and stay healthy, support for this project must be encouraged by our local council.</p> <p>As a registered charity, the Bridleways Group are actively raising money to support any new ventures that will provide for safer riding for our local equestrians. We are affiliated to the British Horse Society and work actively with groups throughout the country, promoting safe and courteous riding.</p> <p>Attached: Horse Count Figures/Existing and Suggested Routes</p>
36	44	Chapter C - Policy C3 - Site W	<p>On behalf of Hollinwood Homes Ltd, we submit the following representations to the Site allocations and Development Management Policies Development Plan Document Publication consultation. Our client is seeking to develop the land for residential purposes over the short to medium term.</p> <p>Our client owns a 0.753 hectare site which sits between 310 and 326 Croston Road (see attached plan). The site forms one of the key points of access to the larger South Ribble Local Plan (February 2000) Policy D8(d) Safeguarded Land at East of Flensburg Way/South of Moss Lane.</p> <p>In the Preferred Options version of the DPD, under Policy G3, the Council proposed to carry through the northern section of this safeguarded land (in which our client's site sits). Following our representation to that plan (Ref 154), the council has reassessed this site and is now proposing to allocate the whole of the current safeguarded allocation for a residential development (with an element of leisure) (Preferred Options Response Table 040712, page 109). However, the Council is seeking for the site to be developed strategically with appropriate masterplanning for the whole site. It is stated that the council would not permit individual areas of land to be developed separately to the rest of the site – it must be a comprehensive development of the whole site.</p> <p>Accordingly, the Publication Policy C3 (Proposals Map Ref W) proposes:</p> <p>Planning permission will only be granted for the development of this site subject to the following:</p> <p>a) An agreed masterplan for the comprehensive development of the site to include the provision of residential development with scope for community and leisure facilities if required by the</p>

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			<p>council within the plan period;</p> <p>b) A phasing and infrastructure delivery schedule;</p> <p>c) An agreed programme of implementation in accordance with the masterplan and agreed design code.</p> <p>Whilst we welcome the removal of the safeguarded land allocation from this site and its allocation for residential use in line with our previous representation, we object to the proposal for our client's land to be comprehensively developed alongside the wider residential allocation to the south and west of the site.</p> <p>Our client's site sits adjacent existing residential development, has excellent access arrangements and would form a natural infill to this section of Farington. The site is separated physically from the wider C3 (W) allocation and thus, is capable of being developed independently and without prejudicing the development of the remaining allocation. As such the site could be delivered promptly, assisting the council in meeting its five year housing land supply requirements and delivering much needed affordable housing over the short to medium term. The requirement for the site to be included within a wider comprehensive development is considered onerous and likely to stymie development for residential uses due to the need for agreement to be reached between several land owners.</p> <p>Accordingly, our client asks that:</p> <ol style="list-style-type: none"> <li>1. The requirement for a masterplan for the comprehensive development is removed from Policy C3; or</li> <li>2. The policy clarifies that the requirement for a masterplan for the comprehensive development is not relevant to our client's site</li> </ol>
37	45	Chapter D - Policy D1 - Site I	<p>Brindle Road proposals (42 dwellings planning permission approved:</p> <ol style="list-style-type: none"> <li>1. The housing development (eastings 358058 / northings 425613) may bring about an increase in traffic on the local road network, which may affect the adjacent Hospital level crossing. I have attached a photo looking back from the Hospital level crossing towards the proposed development land [left hand side of the road]. This crossing is a CCTV [manually controlled barriers] installation – as you will see from the photo the crossing has a yellow-box marking which indicates that we have issues with vehicles queuing over the crossing due to the adjacent road junction. Network Rail would be interested to know whether the council / developers have given any consideration to the additional traffic that the new housing estate will generate, and what impact that will have on Hospital level crossing and the road junction with Bank Head Lane. There is already a significant flow of traffic up and down Brindle Road – this proposed development will no doubt add to it. <ul style="list-style-type: none"> <li>• Can the council confirm that consideration has been given to the increase in traffic flow over Hospital level crossing? We would remind South Ribble Council that they have a statutory responsibility under planning legislation (Schedule 5 (f)(ii) of the Town &amp; Country Planning (Development Management Procedure) Order, 2010) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway.</li> <li>• Network Rail would request a change in the priorities at the road junction – making Brindle Road the through road. Whilst any increase in traffic over this crossing does not necessarily increase the safety risk it could create performance issues if standing traffic on the crossing [those choosing to ignore the yellow-box markings] means the crossing operator cannot lower the barriers before clearing signals for a train to proceed towards the crossing. This would result in delays for passengers using the line (Farington Curve Junction – Hall Royd Junction via Blackburn). It should be noted that on a weekday there are 19 train services from 0600 to midnight passing through Hospital level crossing to Blackpool and 18 services to Colne/York.</li> <li>• With potential for a material increase in the volume of traffic across Hospital Level Crossing, Network Rail would request that any developer provide an S106 developer contribution or CIL contribution toward the funding of Yellow box cameras, the cameras will record vehicles using the crossing and would record abuse (including in regards to Section 291 and Section 293 of the Highway Code).</li> </ul> </li> <li>2. It is unclear at this stage what the finished levels within the development will be and if any form of retaining wall will be required parallel to the operational railway. If one is required then Network Rail will require sight of calculations etc. Network Rail would add that any development next to the railway / Network Rail boundary would need to have submitted by the applicant, method statements and risk assessments, as well as plans to the Network Rail Asset Protection Engineer for all works for review and approval as follows: <ul style="list-style-type: none"> <li>• Excavation / earthworks</li> <li>• Drainage / water features / balancing ponds / SUDs</li> <li>• Lighting</li> <li>• Piling / Scaffolding</li> <li>• Landscaping</li> <li>• Demolition</li> </ul> <p>The council is reminded that all buildings and structures on site (both temporary and permanent) should be placed at least 2 metres from the boundary with the operational railway / Network Rail land. Equally, any noise and vibration survey would only reflect readings taken at the site at the time of the survey and would not take into account any increase in usage of the railway line.</p> </li> <li>3. Network Rail will require details of the fencing arrangements to the rear of the plots that run parallel to the operational railway. For all types of development we would require a minimum 1.8m high trespass proof fence erected adjacent to the railway boundary. The fencing would need to be reviewed and approved by the Network Rail Asset Protection Engineer.</li> </ol>
37	46	Chapter F - Rail Facilities - Paragraph 9.10	<p>9.10 states that, "The Core Strategy identifies the need for a new railway station at Midge Hall."</p> <p>A railway station existed at Midge Hall, closing in 1961. Midge Hall level crossing sits next to Midge Hall signal box on the Farington Curve Junction – Ormskirk line and is crossed by Midge Hall Lane.</p> <p>PHOTO IN HERE</p>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			Any future station at Midge Hall could result in an increase in the volume of traffic over the level crossing, with the potential for issues of blocking back across the crossing as vehicles park at any proposed station. As a first principle, Network Rail would seek to close level crossings where possible, and in this case, Network Rail would seek developer contributions for closure of the level crossing and the installation of a road bridge as well as developer funding for the proposed railway station. Any development would be subject to Network Rail's full approval.
37	47	Chapter D - Policy D1 - Site T	Land off Brownedge Road, Bamber Bridge. 7.52 The site has an area of 2.7 ha and is currently used by Network Rail for open storage spread across the site. It is relatively flat and open in character, bounded by the Preston to East Lancashire Railway to the south; Bamber Bridge football ground to the west; and residential development on the former Baxi site to the east." 7.53 Planning permission does not exist for the residential development of the site but it could accommodate approximately 60 dwellings. Any residential layout will have to take account of the proximity of the railway on the southern boundary of the site." For the foreseeable future this land will be continuing its existing use as an operational railway site. The council should be aware that Network Rail has made contact with them to discuss the site's continued use as operational railway land to facilitate a rail freight operation.
37	48	Chapter F - Tram - paragraph 9.16	9.16 A private company, Trampower, is developing proposals for a tram network within Central Lancashire. The company has plans to construct and operate a tram line through South Ribble and Chorley into Preston City Centre, connecting with Preston Railway Station, as well as eastwards to Preston East/Bluebell Way. 9.17 It is Trampower's intention that the network will be privately funded and will utilise renewable resources to power the trams. This Plan does not depend on the delivery of the tram network to secure development or economic growth." The applicant must seek all necessary consents from Network Rail before any works on site commence with regard to the connection at Preston Railway Station.
37	49	Chapter C - Policy C1 - Pickering's Farm	Planning permission will only be granted for the development of the Pickering's Farm site subject to the submission of: a) an agreed Masterplan for the comprehensive development of the site. The Masterplan must include the wider area of the Pickering's Farm site which includes the safeguarded land to Coote Lane as shown on the Proposals Map, and make provision for a range of land uses to include residential, employment and commercial uses, Green Infrastructure and community facilities; b) a phasing and infrastructure delivery schedule; c) an agreed programme of implementation in accordance with the Masterplan and agreed design code." 6.9 There are currently a number of issues in the area related to traffic congestion, accessibility, public realm and local facilities. To address these issues a key piece of infrastructure that will need to be delivered is the section of the Cross Borough Link Road as required in Policy A1, which will link the A582 Penwortham Way with the B5254 Leyland Road and includes a new bridge crossing the West Coast Main Line." Any proposal over Network Rail land would require agreement on appropriate bridging agreements including: • Asset protection measures • Agreement of the appropriate commercial arrangement
37	50	Chapter D - Policy D1 - Site AA	7.58 This is a small brownfield site, measuring 0.5 ha. It comprises a vacant bus operator's depot with existing buildings requiring demolition. It is located close to Leyland Town Centre, Leyland Railway Station and the main bus route to both Preston and Chorley and is therefore considered appropriate for residential development. The site is bounded by commercial properties to the north, east and west and Bannister Brook to the south. The proximity to Bannister Brook constrains the site and flood risks would need to be resolved with the Environment Agency to facilitate redevelopment." Where developments will result in an increase in footfall at Leyland Railway Station and / or where permission for a development would be subject to usage of Leyland Railway Station – Network Rail would seek S106 developer contributions / CIL contributions to enhance facilities at the station. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development.
37	51	Chapter D - Policy D1 - Site H	"7.27 The site will need to be developed in a comprehensive manner. The existing access to the site is from Factory Lane, but due to the presence of a restricted height railway bridge this access is not suitable to serve the development as a whole. Access will be from the Cross Borough Link Road, subject of Policy A1. The proposed development would be expected to provide or contribute towards the delivery of local infrastructure improvements in the Penwortham and Lostock Hall area. The development will include measures to secure the future of the sports club to the north of Factory Lane." Network Rail would request that the council ensure that any development on Factory Lane does not use the route under the restricted height bridge. The comment states that the bridge is, "not suitable to serve the development as a whole." Any access under the bridge would require the council and the future developer to fund bridge strike mitigation measures as a result of any development.
38	52	Chapter C - Policy C3 - Site W	I am objecting to the proposed development of land directly behind Moss Lane. The impact on traffick and wildlife has not been taken into consideration. The road infrastructure is not cabable of handling the excess traffic that would be created on Moss Lane and Croston Road.  The trees directly behind no 11 have had barn owls and many other species of wild birds, this development would be a disaster for these birds. I would like to be informed about any further planning decisions about this matter.
39	53	Chapter F - Rail Facilities	Please reinstate the Preston to Southport railway line.
40	54	Chapter C - Policy C2 - Moss Side Test Track	Having attended the recent meeting, listened to the Planning Officers reports and studied all the relevant plans regarding the proposals for the development of Leyland test track, we wish to give feedback and to register our strong protest at the proposals for a (possible?) vehicular access and bus route exiting onto Paradise Lane and travelling west. In our opinion these proposals are simply a recipe for disaster.  As you are aware, there is a school on Paradise lane and the traffic congestion there is absolutely horrendous already and parking on both sides of this narrow road already drastically reduces any

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			<p>swift response from emergency vehicles leading leading to the residential developments beyond. We cannot believe that you are even considering adding even more vehicles to this existing chas, let alone the proposed route for a new bus service.</p> <p>One point which we wish to stress most strongly is the fact that Cocker Lane is the only access road for somewhere in the region of three hundred houses. Entry and exit to Cocker Lane is already very difficult at the times mentioned above. Adding more traffic plus buses to Paradise Lane would cause extreme difficulties for those living in and off Cocker Lane.</p>
41	55	Chapter C - Policy C3 - Site W	<p>I am raising objection to the proposed development of the policy C3 site Map Ref. W Land north of Heatherleigh, from Bannister Lane, further North to Moss Lane.</p> <p>Not enough consideration is being given to the loss of the Green fields, and agricultural land the development of this area is completely miss use of good land.</p> <p>I have lived in my house in Moss Lane since 1964, and has been a good area to bring my children up. Your proposal will alter all that for the future generations. Moss Lane is a country road and is not a suitable road for more traffic, and there will be if this goes through. It made it very busy when Flensburg Way the by-pass road at the top of Moss Lane was made.</p> <p>I would ask you to consider the very large amount of traffic on Flensburg Way, I find it very difficult to get out onto that road from Moss Lane now, I am sure the new plans will make it much more busy.</p> <p>My objections are based on the following  Loss of precious green space  Increased noise and air pollution  Increased traffic, posing risk to road safety.</p> <p>I know we can not live in the past, but think what you are planning for the future. I do hope you think about what you are doing to this lovely area.</p>
42	56	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
43	57	Chapter C - Policy C3 - Site W	<p>I would like to post my objection to the proposed residential development to the west of Croston Road, Farington Moss Leyland.</p> <p>This will have a negative impact to the surrounding area for the following reasons.</p> <ol style="list-style-type: none"> <li>1. Increased traffic to Bannister lane and surrounding area.</li> <li>2. Increase in pollution.</li> <li>3. Increase in crime.</li> <li>4. Current property values will be negatively impacted.</li> <li>5. The development will overshadow the gardens of multiple properties preventing the use and enjoyment of this amenity space.</li> <li>6. The development process presents potential hazards in the form of building dust, noise pollution and movement of heavy machinery in a small residential street, where there are a number of children resident.</li> <li>7. Impact of growing wildlife environment</li> </ol> <p>On this basis, I would not consider this proposal to be in keeping with proper development of the area and would ask that the application be refused.</p> <p>If you have further queries please do not hesitate to contact me.</p>
44	58	Chapter C - Policy C3 - Site W	The character of the area would be ruined with the proposed 650 houses in area W. Croston Road is already subject to traffic calming measures. The local shops have limited parking, and the traffic light junction at Golden Hill, is already inadequate. Wildlife in the area has already been badly affected by the new smelly waste plant. This area really has a local feel to it, please build elsewhere.
45	59	Chapter C - Policy C3 - Site W	<p>I would like to post my objection to this proposed development. This will have a negative impact to the surrounding area for the following reasons.</p> <ul style="list-style-type: none"> <li>- Loss of wildlife</li> <li>- Increased traffic to Bannister lane, Croston road and surrounding area.</li> <li>- Increase in pollution</li> <li>- Increase in crime</li> <li>- Current properties will be de-valued</li> <li>- The development will overshadow the gardens of multiple properties preventing the use and enjoyment of this amenity space.</li> <li>- the development process presents potential hazards in the form of building dust, noise pollution and movement of heavy machinery in a small residential streets, where there are a number of children resident.</li> </ul>

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			On this basis, I would not consider this proposal to be in keeping with proper development of the area and would ask that the application be refused.
46	60	Chapter C - Policy C3 - Site W	<p>Why do we have to have another housing estate on Croston Road? We would rather keep the fields, there is land off Wheelton Lane near Morrisons which was a factory and land off Golden Hill Lane which was also a factory, these are brown field sites and not built on.</p> <p>If you insist on building on fields once they have gone they have gone forever. We do not want to live in a city, if we did we would go and live in Preston.</p>
47	61	Chapter C - Policy C3 - Site W	<p>I wish to forward my complaint with the above site.</p> <p>How can you even think of building on the land in this area, have the people in this area not had enough already with the building of the recycle plant with its constant stench and ugly form spoiling the views.</p> <p>The area will lose its beauty, house prices will go down because it is classed as a semi rural area and insurances will go up. More traffic more pollution.</p> <p>Please, please reconsider and use alternative land.</p> <p>I have never before felt the need to write to someone about my grievances. When I heard about the proposal I was shattered, after all the trouble this area has dealt with concerning the Recycle Plant and its effect on the environment and the constant smells I could not believe South Ribble Borough Council would be so cruel.</p> <p>I moved to this area nine years ago because of the natural beauty and the fact it is classed as semi-rural. The house prices will drop, the wildlife will suffer terribly and insurances will rise not to mention more pollution from extra traffic.</p> <p>Please do not change such a beautiful to live, until now I have been so happy here because it is quiet and so full of wildlife - don't change it - keep it special.</p>
48	62	Chapter C - Policy C3 - Site W	<p>We do not expect this objection to have any weight but it seems England's green and pleasant land is not a vision for South Ribble planners.</p> <p>We have lived on Bannister Lane for 18 years having moved to be able to enjoy the open countryside and the natural habitat surrounding us. We originally lived on Lowther Drive and even though we objected to the site which is now Heatherleigh being developed it went anyway so we suppose this objection will be overlooked as well.</p> <p>The proposal of 650 houses will destroy all forms of wildlife not to mention bringing with it CO emissions and other forms of pollution. Leyland already has very little green space but South Ribble seem bent on joining us to Preston with all the houses going up along the by pass.</p>
49	63	Chapter C - Policy C3 - Site W	<p>The proposed 650 home master plan development will cause:</p> <ul style="list-style-type: none"> <li>• A massive impact on the roads. Croston Road currently has 10 speed bumps as traffic calming measures and introducing the additional traffic that this development will bring will only further compromise the road safety for both drivers and pedestrians.</li> <li>• The current capacity of the bypass B5253 Flensburg Way leading on to The A582 Penwortham Bypass and leading to Farington Road and the motorway junctions is quite stretched and has daily traffic delays causing congestion and pollution so the development will only bring further complications, congestion, delays &amp; pollution.</li> <li>• The change to the character of the area will be immense, Farington Moss has the feel of a village we do not want this changed into an extension of the urban sprawl</li> <li>• Despite living close to the B5253 Flensburg Way the fields act as a haven of wildlife and provide a measure of landscape and allow the noise of the traffic to be dissipated.</li> <li>• Bannister Lane is a safe road where children can play outside and enjoy the fresh air this will be lost with an massive development.</li> <li>• The site is too dense with very little safe road access which will cause problems and pollution.</li> <li>• The loss of value to my property from having the open fields replaced with a 650 home development would be catastrophic. The resale price would be severely reduced.</li> </ul> <p>The fact that you as a council didn't notify the residents affected directly when amending the original site due to cost is disgraceful. Should I as a householder not inform you of certain information I am fined.</p>
50	572	Chapter C - Policy C3 - Site W	<p>We are writing to inform you of our very strong objection to the proposed residential development site to the West of Croston Road, Farington Moss.</p> <p>We have had the pleasure of living at this address for the past 40 years and throughout enjoy the environment it provides in its country aspects.</p> <p>The proposed development would, we feel, compromise road safety, due to increased road and pedestrian traffic, provide an unwelcome change to the area in the form of loss of wildlife and landscape, increased noise and air pollution.</p> <p>In addition to the above, we are concerned about the loss of value to the properties in the area which have the unique factor of open land to the rear, which is currently an extremely strong</p>

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			<p>selling feature to be considered in future plans.</p> <p>We therefore wish to strongly object to the proposed development due to the above factors and ask that you take this into consideration</p>
51	64	Chapter C - Policy C3 - Site W	<p>I object to the proposed development, in particular the proposed development of 650 houses on land stretching from Heatherleigh to Moss Lane. I object to the fact that the local government offices of South Ribble have underhandedly proposed this development without notifying affected residents in the area of it's intentions, they may argue that it has been featured in the local press but if you don't subscribe to the paper then you remain ignorant of the intent, it is surely incumbent on the proposers of a development to make aware, by all means necessary, their intentions so that objections can be registered.</p> <p>My objections consist of the following:</p> <p>1) Infrastructure:- the roads surrounding this development are already at full capacity and with a potential for 2000 additional vehicles from this development alone I seriously question its viability. If the traffic from the other proposed development, at the old Leyland Motors test track, is added in then this will impact the already overloaded roads. Croston Road is already a rat run with traffic choosing to forsake the queues on Flensburg Way, add to this the traffic generated by the Global Renewables site plus the traffic from the Barn Hey Drive development and it is quite obvious that the roads were not designed for this volume of traffic. (it might be argued that the increase in traffic is less than 1% but this is against a traffic census undertaken within the last couple of years not against the census that brought about the creation of Flensburg Way and Farington Road ).</p> <p>2) Amenities:- Are the current Doctors, dentists , schools etc. expected to cope with the increased demand or will this require further planning proposals</p> <p>3) Environment :- The proposed development will seriously reduce the amount of green belt land available with its impact being felt on the wildlife within the area, added to this is the potential for increased air, light and noise pollution together with an already present problem of littering along Croston Road.</p> <p>4) Asset Values:- The owners of properties within the proposed development have already seen the value of their assets dramatically affected by the development of the Global Renewables site and this proposal will only compound this negative effect.</p>
52	65	Chapter G - Policy G1	<p>I object to paragraph (e) of Policy G1 for the following reasons:-</p> <p>I consider that this paragraph should be amended to exclude wind turbines, as these would impact on the openness of the land within the green belt.</p>
53	66	Chapter C - Policy C3 - Site W	<p>I would like to lodge my objection to the proposed development. There are several important factors which I would like to bring to your attention:</p> <ul style="list-style-type: none"> <li>• Lack of appropriate consultation with local residents.</li> <li>• Ill publicised amendments to the original planned development.</li> <li>• Adverse effects on the surrounding properties e.g. noise and air pollution; loss of privacy; loss of open aspects to rear and reduction in value of properties.</li> <li>• Area is already suffering from frequent presence of obnoxious odours which invade our homes from Global Renewals – despite reassurances and promises. Use the land adjacent to this site if you wish to minimise damage to the area (if anyone wants to live with the odours produced).</li> <li>• Increased traffic on Croston Road – present traffic calming measures having had little impact, the volume and speed of traffic already a serious hazard.</li> <li>• It is productive agricultural land due to the excellent quality of soil in the area which spans both sides of the by pass.</li> <li>• Recent building projects in the area have already increased crime rate and drug related incidents in the locality.</li> <li>• Irrevocable damage to wildlife i.e. pond and copse at the rear of our property is the habitat for several species wildlife (frogs, toads, nesting herons, water birds, insects, squirrels, foxes, rabbits and a wide variety of birds which inhabit the area.</li> <li>• The proposed large residential site would completely change the character of the area which historically has always been a close knit rural community</li> </ul>
54	67	Chapter C - Policy C3 - Site W	<p>Please see identical representation Ref No 53, ID 66.</p>
55	68	Chapter C - Policy C1 - Pickering's Farm	<p>From studying the proposals map, I realise that my house (address below) lies within a 'G3 Safeguarded Land' designated area; although this was pointed out to me by my solicitor when I purchased the house last year, I understood this to mean that the land North and South of my house could not be developed upon.</p> <p>As you can probably appreciate, I am now somewhat concerned as to what the future holds for the countryside surrounding my property – please understand that a major factor of when I decided to purchase my house (only last year) was that it was located within a rural setting. Despite now feeling a little naive that I did not ask my solicitor to define 'Safeguarded Land', I feel your description could have been made clearer (e.g. 'Land Reserved for Development' would have been more suitable) and, if so, in hindsight I would probably have chosen not to purchase this property. Nevertheless, from reading your documentation, I believe the land immediately adjacent to my property will not be developed upon until 2026; please can you confirm this?</p> <p>With regards to the 'Policy C1 - Pickering's Farm, Penwortham' proposed development, your document states that: "planning permission will only be granted...subject to the submission of an agreed Masterplan for the comprehensive development of the site. The Masterplan must include the wider area of the Pickering's Farm site which includes the safeguarded land to Coote Lane as shown on the Proposals Map, and make provision for a range of land uses to include residential, employment and commercial uses, Green infrastructure and community facilities..."; could you please clarify/answer the following:-</p> <p>I assume that the safeguarded land to Coote Lane includes the safeguarded land to Chain House Lane also (i.e. the land adjacent to – and including – my house)?</p> <p>Is there a risk that you would consider some kind of 'compulsory purchase' order on my property should you desire to build on my plot?</p>

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			<p>I assume that this Masterplan has not yet been created. When will this plan be available to review? Does the general public have any influence on what is decided during its production?</p> <p>Other concerns that I can think of at present are:-</p> <p>The proposed 'dual-carriage waying' of A582. Firstly, would it still be possible for me to cross over this junction, by vehicle, to continue on Chain House Lane towards New Longton? Secondly, would I still be able to join/exit the A582 at this junction to allow me to travel North/South? In short, I am concerned that I may be forced to take long detours to get to places that are, at present, easily accessible.</p> <p>Loss of privacy. I would like to express my concern that any future development around my property could result in a loss of privacy from all directions and thus de-value my property.</p> <p>Environmental Impact. I believe that the proposed development of Pickering's Farm (and any subsequent development on G3 Safeguarded Land') will have a huge impact on the environment (e.g. loss of grassland, hedgerows, wildlife, etc.) due to its sheer scale. As mentioned above, the reason I moved to this area was to live amongst the countryside.</p> <p>Loss of Whitestake identity. I feel that should the Pickering's Farm development (and any subsequent development on G3 Safeguarded Land') go ahead then any 'rural Whitestake' properties that are East of the A582 will become swamped by new housing. Where exactly would the boundary between Whitestake and Penwortham be? Is there a plan to force these 'Whitestake' properties to be re-classed as 'Penwortham? If so, this could affect any insurance premiums that we pay.</p> <p>In summary, I feel rather threatened by the huge Pickering's farm development, and unclear as to what the Masterplan is that could affect the G3 Land immediately adjacent to my property. Hence I would like to express my point of view by stating that I would prefer these developments not to proceed and alternative sites sought.</p>
56	69	Chapter C - Policy C3 - Site W	<p><b>PROPOSED BUILDING FARINGTON MOSS (HEATHERLEA – MOSS LANE)</b></p> <p>Regarding this future proposal my husband and I are registering our strong objection to this development. You as a council should already be aware of the main issues regarding the infrastructure of the area: -</p> <p>1: <b>TRAFFIC</b> how will a building development of this magnitude deal with the extra volume of traffic? Croston Road is a very busy road even with the By-Pass</p> <p>2: <b>POLICING/CRIME.</b> As you know Lancashire Constabulary have a £43 million shortfall and this has impacted on patrols in the area and with the increase in housing on Buckshaw village and the surrounding areas the Police are stretched to the limit without any further impact with this proposed development</p> <p>3: <b>HEALTH AND WELFARE.</b> Again the NHS is under great pressure with reduction in funding and staff. Where are all these extra people going to go? How are the surgeries going to cope and the hospitals?</p> <p>4: <b>FARINGTON MOSS</b> is on a <b>FLOOD PLAIN</b>, there are ditches and bankings in the area to prevent flooding including Bannister Lane where we live. The council and the government are always asking for the public not the block pave or tarmac driveways as gardens take a lot of excess water and if driveways etc. are paved the water has nowhere to go. If a development like this is allowed to go ahead, where is this excess water going to go? A few ditches will not be enough to cope with the amount of water that the development area is to take up. The recent amount of rainfall should pose as a warning to this.</p> <p>In The Sunday Times a few weeks ago it was reported that councils are building on flood plains and not informing new residents of this fact when they are buying houses in these areas and as such some new residents have had to pay a higher rate of insurance and in some cases have not been able to insure their houses at all, which is a disgrace</p> <p>My husband and I and I am sure other residents in the area would find this very irresponsible of the council if it allows such a massive housing development to be allowed on a 'MOSS' and a flood plain. If our house was flooded due to this development after never having this problem previously due to the interventions that are in place, we would surely have the right to sue the council for any flooding / damage costs incurred when you as a council were aware of the risk in the first instance.</p> <p>5: <b>Farington Moss</b> is a beautiful semi-rural area which will be permanently destroyed if this housing development is allowed and Leyland as a town in its own right is now becoming one massive building development and we feel this will have a detrimental effect in the years to come.</p> <p>We strongly urge the council to reconsider this building application and to refuse any planning permission.</p>
57	70	Chapter H - Policy H1	<p>We support the document because this policy will protect your cultural facilities. We suggest however for clarity that a description of the term 'cultural facilities' and 'community facilities is included in the text and suggest –</p>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<ul style="list-style-type: none"> <li>• Cultural Facilities: cultural facilities and services include provision for festivals, theatre, cinema, libraries, museums, art galleries, public art, music and dance venues, spiritual centres, landscapes, heritage and tourism.</li> <li>• Community Facilities: community facilities provide for the health, educational, sport, recreation and leisure needs of the community</li> </ul>
57	71	Chapter G - Policy G9	<p>Although the policy and accompanying text doesn't mention The Derby wing's art centre and theatre, under our remit below, we request to be consulted over any improvements or alterations to the theatre.</p> <p>The Theatres Trust is The National Advisory Public Body for Theatres which was established by The Theatres Trust Act 1976 to 'promote the better protection of theatres'. The Trust delivers statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2010 (DMPO), that requires the Trust to be consulted on planning applications which include 'development involving any land on which there is a theatre.</p>
57	72	Appendix 5	We support the document and are pleased to see theatres are listed in Appendix 5 Parking Standards.
58	73	Chapter D - Policy D1 - Site P	<p>On two occasions in the last 18 months since we have lived on Leyland Lane, our garden to the rear has suffered severe flooding when we have had sustained downpours. On both occasions the depth was about 4 inches and I have had to raise a manhole cover to mitigate the flooding and if this development goes ahead I can only see it being more serious and more frequent, as there will be very little open ground to absorb the rainfall. There is a definite increased risk of flooding.</p> <p>A massive development as proposed will mean a massive increase in traffic along Leyland Lane with its attendant increase in air pollution and an increase in the already high noise pollution. Although there is a 40mph speed limit on this road it is rarely adhered to and I can only see this problem increasing.</p> <p>Although there is several rights of way that run across this land and they are to be protected, they are frequently used by people who want to enjoy the countryside not walk through a housing estate.</p> <p>There are a great many mature trees and hedgerows. These need protecting and if the housing goes ahead it is more than likely these will be cut down and reduced in number. Trees are also an important part of the control of water and with the reduction in numbers and the tarmacing of this area can only make the problems of potential flooding worse.</p> <p>On a personal basis we are very concerned about being overlooked. The housing on our section of Leyland lane mostly are Bungalows and therefore are easily overlooked.</p> <p>If this area is deemed to be good agricultural land why build houses on it.</p> <p>If this area is a natural extension to Leyland, where does it stop, does the land after Altcar Lane then become vulnerable to development</p>
59	74	Chapter C - Policy C3 - Site W	<ul style="list-style-type: none"> <li>• Loss of my job, I work for the farmer that farms that land, no land no job for me.</li> <li>• Increase of traffic on Croston Road, compromising road safety which is already very noisy due to humps in the road, and busy due to wagons that are not supposed to come down, South Ribble bin wagons going to the recycling depot which they are not supposed to come down Croston Road except on collection days, cars speeding down the middle of the road trying to avoid the humps. Vans with trailers speeding over the humps and losing their loads.</li> <li>• Change to the character of the area, loss of wildlife and landscape, increased noise and air pollution.</li> <li>• Loss of value to my property, which has already lost its value due to the recycling depot, with wagons coming up and down Croston Road, the stench and pollution it chucks in to the air.</li> </ul>
60	75	Chapters D and G - Policies D1 and G3	<p>BE Group are agents for two adjoining landowners, [names deleted for database] who together own 8 ha of land in Farington. Our clients' land comprises a self-contained area as it is bounded by Coote Lane; the Preston to Ormskirk railway: Church Lane and the Preston to East Lancashire railway.</p> <p>Although Policy G3 does not provide specific identification on the Proposals Map for the five areas of Safeguarded Land for Future Development included in Policy G3, our clients' landholdings form part of the area referred to as 'South of Coote Lane, Chain House Lane, Farington.'</p> <p>An outline planning application for residential use is currently being prepared for the 8 ha site.</p> <p>This representation seeks to see our clients' land allocated for housing development, rather than as its continuance as 'Safeguarded Land.' The basis for this is as follows:</p> <ol style="list-style-type: none"> <li>1. South Ribble does not have a 5 years supply of available housing land. This has been accepted by the Borough Council and has been a determining factor in recent planning appeal decisions which have seen consents granted for applications originally refused by the Borough Council. Factors such as land ownership; site assembly; infrastructure costs; lapsed options; a lack of commitment from site owners have contributed to this position.</li> <li>2. The Borough Council has acknowledged that in accordance with the National Planning Policy Framework, the trigger of an additional buffer of 20 percent applies because there has been persistent under delivery against housing targets. This means South Ribble needs to demonstrate a six years deliverable supply.</li> <li>3. Our clients' landholdings can deliver sustainable development. Development is not contingent on the provision of offsite infrastructure that might impose delay on the land being brought into use or that might challenge its viability. There are only two landowners and both parties have agreed to the development of their respective landholdings on a joint basis. Furthermore the site is</li> </ol>

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			<p>by nature of its location and surroundings fully self contained and should not be construed as forming part of a larger area that requires a more comprehensive development approach.</p> <p>4. In support of our argument that the location is sustainable we provide the following observations:</p> <ul style="list-style-type: none"> <li>• Non Car Accessibility The site is well located to ensure that movements by car mode are reduced as much as possible. It lies close to the bus network and Tardy Gate district centre.</li> <li>• Walk With consideration of walking distances, the Institute of Highways and Transportation (IHT) produced their 'Guidelines for Journeys on Foot' in 2000, which suggests that around 80 percent of walk journeys and walk stages in urban areas are less than 1 mile, with the average length of a walk journey being just 1km (0.6 miles).</li> </ul> <p>Historic guidance in PPG13 also recognises that walking is the most important mode of travel at the local level, and has the greatest potential to replace car trips for distances up to 2 kilometres.</p> <p>The distance that people are prepared to walk depends somewhat on the journey purpose. The IHT guidance also provides 'suggested acceptable walking distances'. The walking thresholds, illustrated in terms of the site's location on the plan below, are suggested as:</p> <p>TABLE SHOWING SUGGESTED THRESHOLDS</p> <p>For residents who are commuting to work the potential walk catchment is up to 2km from the Site.</p> <p>The site is within a 4/5 minute walk of a primary school and the bus network connecting it, via a linked trip to the north west. A 10 minute walk connects to Tardy Gate district centre and local employment zones. There are larger employment opportunities within the 2km walking distance.</p> <p>MAP SHOWING 2KM WALKING DISTANCE</p> <p>Cycle The National Travel Survey NTS (undertaken by the Dft) has identified that although bicycle useage may be dependant on an area's topography, it considers a mean distance of between 5 – 10 kilometres a reasonable travel distance between home and workplace.</p> <p>The plan below shows that a number of adjacent urban areas are within the 5km cycling distance of the site and would involve a journey of around 25 minutes using a leisurely cycle speed of 12 kilometres per hour.</p> <p>Cycling also has the potential to substitute for short car trips, particularly those under 5 km, and to form part of longer journeys by public transport.</p> <p>MAP SHOWING 5KM CYCLING DISTANCE</p> <p>Bus National criteria state an accessible location to be a 400m distance to a bus stop with a good level of bus services. This normally occurs in a large town. The site is located close to the local bus network as illustrated in the following plan. These bus routes connect the area to the semi urban hinterland and Preston city centre.</p> <p>The routes have a range of frequencies from high (20 minutes in the peak, hourly off peak) to the major towns, to lower frequencies for the rural hinterland that meet local needs</p> <p>MAP OF BUS ROUTES</p> <p>5. Our clients' landholding is referenced as 'FW8 Safeguarded Land f (eastern part), Church Lane' in the Central Lancashire SHLAA 2011 Update published in February this year. It identifies housing completions on the site beginning 2016-17. This places the site within the five years supply period of 2012-13 to 2017-18. We would therefore question why Policy G3 should seek to safeguard the land for the whole of the Plan period ( or until the Plan is next reviewed) particularly as the Borough Council has now in this document allocated other previously defined safeguarded land.</p> <p>6. The DPD Proposals Map identifies Green Corridor Policy G12 along one boundary of the site. The existence and protection of this green corridor would not be prejudiced as a result of earlier development as this could easily be incorporated into the open space structure of the site development.</p> <p>Consequently we consider and request that this land should be removed from Policy G3 Safeguarded Land for Future Development and is included under Policy D1 as a New Housing Allocation Site. The site's development is not contingent on any extraneous circumstances that would incur delay (unlike a number of the sites that are already included in Policy D1). The site is deliverable</p>

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			<p>for housing in that it is available, suitable and achievable and thus can be delivered promptly, which would assist the Borough Council in meeting its six year housing land supply requirements.</p> <p>Should South Ribble Borough Council not be prepared to allocate our clients land for housing then we would seek that amendments are still made to the DPD in respect of Policy G3 and the explanatory justification paragraphs.</p> <p>South Ribble has persistently seen annual housing completion targets missed –hence the need for a six years supply to be identified (five years plus 20 percent buffer rather than 5 percent in accordance with the NPPF). South Ribble Borough Council needs to remain alert to ensuring there is a deliverable supply, which means new sites may need to be brought forward. The ‘safeguarded land’ locations identified in Policy G3 clearly have the potential to be a source to meet shortfalls (in safeguarding these land areas the Council recognises they are appropriate housing locations). The emphasis of Policy G3 which would see safeguarded areas remaining undisturbed during the whole of the Plan period (i.e. for a further 15 years) - or until the Plan is reviewed - should be removed and flexibility introduced that would permit such designated land to be brought forward at any time during the Plan period to fulfil the Council’s obligation to have a six years supply of available, deliverable housing sites that meet the RSS (plus 20 percent buffer) target.</p> <p>We would request adjustment to the description in Policy G3 of the safeguarded land presently defined as ‘South of Coote Lane, Chain House Lane, Farington’ particularly in view of the Council’s intention that planning permission will not be granted for development which would prejudice longer term comprehensive development.</p> <p>Our clients’ landholding is clearly self-contained. To include it as part of a wider area (which might then invoke an argument about comprehensive development in conjunction with other landholdings) is wholly inappropriate. With a live railway and road providing distinct separation from the remainder of what comprises the ‘South of Coote Lane, Chain House Lane, Farington’ safeguarded land designation, our clients’ land is a developable area in its own right. Nor would such separation prejudice the viability of the infrastructure that might be required for the development of those other areas.</p> <p>Consequently we consider the ‘South of Coote Lane, Chain House Lane, Farington’ designation should be split and identified as three distinct locations, namely:</p> <ul style="list-style-type: none"> <li>• South of Chain House Lane, west of Church Lane</li> <li>• East of Church Lane, north west of the Preston – Ormskirk railway</li> <li>• South of Coote Lane, east of Church Lane, south and east of the Preston – Ormskirk railway.</li> </ul> <p>The latter is our clients’ landholding.</p> <p>We also seek change to the wording of Policy G3 so that land identified as safeguarded under this policy will be considered for development at any time within the Plan period in order to fulfil the Borough Council’s requirement to demonstrate at all times there is a six years supply of available, developable housing land.</p>
61	76	Chapter C - Policy C3 - Site W	<p>I would like to strongly object to the proposed development of the above land. This will have a detrimental effect on this neighbourhood. The land is currently home to numerous species of wildlife which will be greatly affected by this development.</p> <p>Our quality of life will also be affected as our house is currently facing onto open fields and we assume any development will mean that our outlook will be greatly affected and that houses will be built right up to the boundary.</p> <p>This will have a significant effect on the value of our property and I assume no compensation will be paid for this.</p> <p>The roads in this area are already significantly overloaded and I do not understand how they will cope with a further 650 cars trying to use them.</p>
62	77	Chapter C - Policy C3 - Site W	<p>We do not expect this objection to have any weight but it seems Englands green and pleasant land is not a vision for South Ribble planners. We have lived on Bannister Lane for 18 years having moved to be able to enjoy the open countryside and the natural habitat surrounding us. We originally lived on Lowther Drive and even though we objected to the site which is now Heatherleigh being developed it went ahead anyway so we suppose this objection will be overlooked as well.</p> <p>The proposal of 650 houses will destroy all forms of wildlife not to mention bringing with it CO emissions and other forms of pollution. Leyland already has very little green space but South Ribble seem bent on joining us to Preston with all the houses going up along the by pass.</p> <p>Croston Road has more than enough vehicles on it at present and a further 650 houses with the cars that will entail will make getting out of Bannister Lane extremely dangerous as the speed humps now in place do not slow down the majority of the traffic.</p> <p>We do hope common sense will prevail.</p>
63	78	Chapter C - Policy C3 - Site W	<p>I very strongly object to the proposed residential development, on land at the end of Murray Avenue, at the rear of my house on Moss Lane.</p> <p>I also object to any vehicular access to any proposed residential development at the end of Murray Avenue.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>Access, if granted, would mean the width of Murray Avenue being extended, this would bring traffic very close to my property. Also, Moss Lane would have to be made much wider, to accommodate the increase in traffic, and a much better drainage system installed.</p> <p>Moss Lane is already used by traffic going to, and coming from the bypass and waste disposal centre, and if the above proposals go ahead, the increase in traffic will be tremendous.</p>
64	79	Chapter C - Policy C3 - Site W	<p>We are writing to express our objection to the proposed planning proposal between Heatherleigh and Moss Lane.</p> <p>The building of property on this green land will have a very negative effect on the surrounding area both in terms of destroying wildlife and quality of living. Has anyone from the planning department visited these fields and looked at the vast amounts of birds and wildlife that live there?</p> <p>We do not understand why there is a need for such a development when so many houses in Leyland have been up for sale so long, there is obviously little demand for property.</p> <p>We moved to Leyland from Warrington as we believed it offered a better quality of life, as Warrington was constantly under redevelopment, it now looks like Leyland will go the same way. Warrington lost all its true heart and became a place where families moved to for a short time and then moved on.</p> <p>This proposed development appears to be heading the same way and I hope that whoever makes these decisions will consider the longer term implications before approving this proposal.</p> <p>Please remember we have already had to put up with bad smells coming from the waste site, do you really care about people who already live in this area or is the council just going to sign off anything that makes it look like it has ticked a few more boxes for the government.</p> <p>The area is already congested with traffic and the local roads will not be able to cope with the traffic increase from the building of 650 houses in this location. It regularly takes up to 15 minutes to reach the motorway in a morning, we cannot begin to imagine how the roads will cope with a potential 650 more cars trying to access the same route. Can you provide the data that shows us how you propose to rectify this problem or are you going to leave us all to try and sort it out ourselves.</p> <p>We have little doubt that this proposal will be passed so we would also be interested in hearing what compensation you are proposing to give the local residents for the drop in valuation of our properties. Our house is currently at the end of a cul-de-sac and overlooks green fields; this is obviously going to be covered with houses and whatever else you propose to build on this land. This will knock thousands of pounds from our property and have a negative effect on our standard of enjoyment of living in such a beautiful setting; therefore we believe that this should be compensated for.</p> <p>I look forward to hearing your views on this matter.</p> <p>(Also see representation Ref 061)</p>
65	80	Chapter D - Policy D1 - Site G	<p>As landowners of the Farington Hall Estate we make representations on the following sites:</p> <ul style="list-style-type: none"> <li>- Site E1(g) – Farington Hall Estate, West of Leyland Business Park, Farington</li> <li>- Site D1 (L) – Land off Grasmere Avenue, Leyland</li> </ul> <p>Both sites adjoin one another and are currently allocated within the South Ribble Local Plan for employment and residential development – Land Adjacent to Lancashire Enterprises Business Park (Policy EMP1 – Site D) and Land West of Grasmere Avenue, Farington (Policy HP1 – Site C). The latter has recently been subject of a resolution to approve planning permission for up to 160 dwellings subject to a Section 106 Agreement.</p> <p>We support the identification of both sites for development. The sites are highly sustainable being within walking distance of a range of shops, schools and services and have access to a range of means of transport. The sites also lie within the urban area, are available for development and have been the subject of detailed appraisal. It is confirmed that there are no technical factors such as flood risk or ecological factors that would impede their development.</p> <p>In relation to matters of detail regarding the description of Site E1 g, due to the derelict nature of the site and the remediation required, a comprehensive approach will need to be taken to progress its delivery. To achieve this we request that the uses permitted are widened to include mixed development opportunities. This should include additional residential provision. This could, for example, extend to include the area of land to the west of planning application 07/2011/0711/ORM to the boundary of the River Lostock and south of Mill Lane.</p> <p>In addition, other supporting employment generating uses should be allowed, for example a nursery, healthcare facilities and a hotel.</p> <p>We consider that this would add to the overall delivery of the site whilst being compatible with surrounding land uses.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			We look forward to discussing our plans for the site further with you.
66	82	Chapter C - Policy C3 - Site W	<p>I am writing to register my objections to the proposed development for the land between Bannister Lane and Moss Lane, Farington Moss, which runs directly behind my house. As if it wasn't bad enough allowing the waste plant to be built – spoiling the views to the front of the property, not to mention the smell it produces. But now the council wants to spoil the rear view as well.</p> <p>My property already has decreased in value because of the waste plant, but if 650 houses are built behind then this will decrease the value further. I bought this house believing that the moss was a very important arable area for farming and that it would not change from green belt banding. If we continue to build on all the fields, where on earth are our farmers going to feed the animals, grow their produce etc.</p> <p>I have lived on Croston Road all my life and have seen it go from a lovely rural area to a concrete jungle. Have we not got enough housing already because judging by all the For Sale signs on all the housing estates round the area, people looking for houses already have too much choice. I know this will mean missing out on all the revenue the council tax brings in from these houses. But it's not like you actually spend this money on the community. The roads round this area are already a disgrace. I watched a fence being erected opposite the Wheatsheaf pub on Croston Road take 3 – 4 weeks to complete. It was a day's job. Talk about wasting money.</p> <p>The increased traffic to the area is also a concern. The traffic lights on Croston Road/Golden Hill Lane/Longmeaneygate struggle to cope on a good day. But it is only a matter of time before someone is killed. It is a death trap and needs sorting soon. More houses – more traffic. Our children are going to be put in danger with the increased number of vehicles new housing would bring.</p> <p>Seriously – please do not allow this development to go ahead. Land and green fields are precious and should be left to house our wildlife. Leave the land alone.</p> <p>Please would you send an acknowledgement to let me know you have received this objection letter.</p>
67	83	Chapter C - Policy C3 - Site W	<p>I am writing to object strongly to the proposed development of 650 houses on the land between Croston Road and Schleswig Way and all the way from Heatherleigh to Moss Lane. Has anyone given any thought to the plight of several homeowners on Croston Road who have been trying to sell their homes for 2 or 3 years without success because of the uncertainty about the impact of the new waste plant being built – this new proposal is certainly not going to help matters. Building these new houses will mean that all our homes currently on Croston Road, Bannister Lane, Five Acres, Moss Lane and Heatherleigh will lose value. Speed humps were installed on Croston Road a few years back to try to relieve traffic flow on Croston Road but this will surely increase if these houses are built as I understand access will be from Croston Road.</p> <p>I hope that the Planning Committee will have a re-think about this radical proposal as it would be a shame to spoil this beautiful area.</p>
68	84	Chapter C - Policy C3 - Site W	<p>I wish to raise objection to the proposed extension of the Policy C3, site map ref W; concerning the allocation of land between Heatherleigh and Moss Lane for the purpose of residential dwellings.</p> <p>At present, this is one of the few remaining areas in the locality of outstanding natural beauty marred only by the hideous, but sadly necessary Leyland by-pass.</p> <p>With its lovely open aspect, and the once eyesore Heatherleigh site now being virtually “invisible”, it is an area not only enjoyed by the local residents, but by many people from outside the locality.</p> <p>I submit that it would be an absolute travesty to destroy such an area by transforming it into yet another building site/housing estate and wish to protest in the strongest possible terms to your proposal.</p> <p>Furthermore, the said land until recently, was designated “Not a sustainable use of resources” fit only for agricultural purposes or “Yellow Land”. Now, it has rather conveniently been re-designated as prime building land without the knowledge of the local residents whose lives it directly impacts.</p> <p>It is my belief that this beautiful area should be preserved indefinitely for future generations to enjoy and more consideration given to alternative “brownfield sites” to facilitate the borough's needs to meet the required level for residential dwellings.</p> <p>Indeed, I believe that this site was specifically chosen as a convenient and easy “fix” to the borough's housing problem at the same time satisfying disgruntled land owners who for many years, because of its designation, have been unable to do anything with this picturesque and relatively tranquil area, other than allow many people to enjoy its beauty.</p> <p>The proposed access to the north of the proposed site being quoted as “Moss Lane” is a gross contradiction in itself, since planning permission to develop the land to the rear of houses 7 to 11 Moss Lane and to the rear and side of the two houses on Murray Avenue has been previously refused, with one of the reasons being “Unsuitable access via Moss Lane”. If Moss Lane was deemed unsuitable access for a handful of dwellings, why has it now suddenly become suitable access for several hundred!?</p> <p>The fact is, Moss Lane is suitable only for its intended purpose of providing access to the properties currently on Moss Lane including Murray and Marks Avenue, and could not be developed to provide a road plus pavement wide enough to suit the increased level of traffic this proposal would bring, at the same time satisfying all the health and safety pre-requisites.</p>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>Local residents already live in fear for their safety when walking on Moss Lane due to people taking “short cuts” between Flensburg Way and Croston Road and vice versa. This is particularly prevalent at the morning and evening rush hours with people driving at ridiculous speeds along Moss Lane which is partly single track. I fear it is only a matter of time before a serious or even fatal accident will occur and this proposal only serves to further heighten my concerns.</p> <p>I must also point out that this proposal will have a serious impact on both noise and air pollution, including completely obliterating the local wildlife as well as many beautiful trees, some of which date back to the nineteenth century.</p> <p>Finally, I do not believe enough thought and consideration has gone into this proposal and the ramifications it will have on the area as a whole. In particular, as a council tax payer, I am appalled at the total lack of direct communication by the borough council, to the residents of the area concerning this proposal and strongly recommend it be scrapped indefinitely.</p>
69	85	Chapter C - Policy C2 - Moss Side Test Track	<p>I am writing about the above document and specifically the current proposals for the Moss Side Test Track development to include cul-de-sacs and emergency access from the very western side of Longmeanygate (opposite house number 192) onto the Test Track site.</p> <p>Obviously the proposals are still at a fairly early stage, but I would like to point out there is a significant problem with this particular access, and hope this can be addressed and taken account of in what will presumably be a final brief/proposed masterplan that can go to any potential developers.</p> <p>This is that from Waltons Barn, which is immediately north of no 192 Longmeanygate, there are no pavements on either side of the road northwards until you reach the Midge Hall T Junction, and this is a busy, bendy – there is a bad bend immediately north of the barn on which there have been fatalities in the past (when people have crashed into the barn) – national speed limit road.</p> <p>The effect of the cul-de-sacs, and indeed the whole test track development will be to increase traffic on Longmeanygate (not good for example given the number of horses that use the road, plus of course the above bad bend). However, more importantly it will also vastly increase the number of people walking along Longmeanygate eg going to and from the Midge Hall pub, which could easily become ‘the local’ for many people on the proposed site. However, as I say, there are no pavements on either side of the road, and at times you have to literally step into the road to walk along the above route. Hence I would be greatly concerned that very nasty accidents involving pedestrians could occur along this particular part of Longmeanygate if access is allowed.</p> <p>Also, I would not underestimate the number of pedestrians there might be. I have been in my house for just over a year now (moved in in June 2011), and I have been shocked just how many people have walked past, because given the number of houses in the area I would have expected hardly anybody. Hence if there is any sort of pedestrian access (which would normally be a very good thing allowing people on the estate into a bit of rurality close to their doorsteps) in this particular area I think that the number of people walking northwards towards Midge Hall will be vastly increased, and as I say there are no pavements, and it is an especially difficult and dangerous road to navigate – I would be particularly worried for example about people walking back from the Midge Hall pub on a Friday/Saturday night when they’ve had a drink or two, and there are ‘boy racers’ about (a normal occurrence on the nights in question).</p> <p>Hence, is it possible for the access to either be moved or removed entirely – I would suggest it would be a very good idea for whoever is preparing the final brief/masterplan to come and have a look at the area in question, as I’m sure they would be able to see the problems instantly – for example I haven’t even mentioned the incredibly narrow pavement next to the barn and the ditch on the opposite of the road meaning you have to be extremely careful walking along this bit, plus of course there’s the destruction of perfectly good woodland allowing the access road/cul-de-sacs in the first place.</p> <p>Hence I would be grateful if you could pass the above concerns onto whoever is producing the final brief/masterplan so that they can hopefully take account of them.</p> <p>PS At a public meeting the other night chaired by Councillor Michael Green, it was suggested having access (if it was absolutely needed) onto the estate from the T Junction at Midge Hall, via the construction of a new roundabout with the access road possibly taking account of an old emergency access road onto the test track.</p> <p>If this was the case the pedestrian access/pavements would be instantly solved, as relatively few would then turn southwards back towards Dunkirk Lane. Also they would have access to Ashtons Garden Centre, Bamfords, etc, as well as the Midge Hall pub, and indeed potentially a newly re-opened Midge Hall railway station, which would now have many more people (I would assume upwards of 2,000 given the number of proposed houses on the test track) right on its doorstep, and within comfortable walking distance.</p> <p>OK the increased traffic problems and the above bad bend I mentioned would still apply, but the above potential access would be much better than the current, and I urge whoever is producing the brief to explore this possibility (it is worth noting the owners of the above land in question were present at the meeting) before the current access points from Longmeanygate become too set in stone.</p>
70	86	Chapter C - Policy C3 - Site W	<p>Our objections are as follows:  1 Moss Lane is totally unsuitable to be used for access to this proposed development site.  1.1 Compromised Road Safety  Increase in traffic in Moss Lane will cause significant risk to pedestrians, cyclists and residents as Moss Lane is clearly not designed to accommodate the huge increase in vehicle and pedestrian traffic inherent in the development proposal. Even if the main access might be intended to be via a new road to the roundabout at Flensburg way, residents in the new development will quickly realise that a very convenient short cut to Leyland can be made down Moss Lane onto Croston Road. This would substantially increase traffic flow to Moss Lane and appears not have been</p>

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			<p>properly considered in the proposals.</p> <p>Residents have already noticed increasing numbers of vehicles using Moss Lane as a cut through to the recycling centre site on Flensburg way and towards Penwortham and Preston. This has led to residents often having to take urgent evasive action to avoid vehicles trying to pass each other (very little passing room) or simply speeding through. The restricted amount of pavement is a significant issue and it is difficult to see how this can be improved sufficiently, whilst accommodating increased volumes of road traffic.</p> <p>1.2 Small amount of Pavement Area Moss Lane only has very limited pavement area – only 50m of pavement exists (total length of Moss Lane is 522m) and that is only on a single side of the road. The pavement area is available for only 9% of the length of Moss Lane and even that is only on one side of the road.</p> <p>1.3 Single track Road Moss Lane is too narrow for two-way traffic flow. Moss Lane road width ranges from 2.76m in the westerly part of the lane to 3.76m in the majority and 4.7m closest to the entrance of Croston Road. When vehicles are parked in the street there is at most only a 2.5m gap for passing traffic, making it unsuitable for two way traffic and requiring drivers to give way to one another in order to have any chance of passing each other. Drivers have been seen to swerve inwards at the last minute to avoid collisions.</p> <p>1.4 Road Weight Limit Moss Lane is a single track lane, with a weight limit of 7.5 tonne, with no pavement from the entrance to Moss Lane down to Murray Avenue (90% of the total length of Moss Lane).</p> <p>1.5 Risk to the safety of current residents now Moss Lane is only just fit for its current use, with a relatively low traffic flow. Any further increase in road traffic will present an unacceptable level of risk to the safety of current residents of this narrow lane. Indeed there is a strong case to prevent through-traffic from using Moss Lane now.</p> <p>2 The amended proposals are likely to cause as many problems as they solve and there has been inadequate attempts to consult with residents about the land usage changes affecting houses in Moss Lane and Murray Avenue.</p> <p>2.1 We note that under the original plans for this site the proposed development was for the Heatherleigh south side only. Following objections from Heatherleigh residents to the development, the proposal has now been amended to include all land between Bannister Lane and Moss Lane. The reason for this amendment as recorded by your planning officer Zoe Harding was stated as “due to objections from the residents of Heatherleigh that the development was too dense for the area”. However all this amendment has achieved is to shift the problem from residents at Heatherleigh to the residents in Moss Lane, Murray Avenue, Marks Avenue, Five Acres, Croston Road and we would claim that the development is also too intense for this area which is also considerably more rural than that of Heatherleigh a purpose built housing estate next to the bypass.</p> <p>2.2 We are pleased to see that Bannister Lane is not cited as a point of access for the proposed development, yet in comparison with Moss Lane, Bannister Lane has far better and safer pedestrian pavement access on the north and south side of the road. It also has a road traffic width of 6.6m excluding pavements. Bannister Lane is a much wider road than Moss Lane with a much better pavement area. If access to Bannister Lane is protected, the same principles should apply to a road that is by any measure even less suitable as a potential access road i.e. Moss Lane.</p> <p>2.3 Previous plans for residential development to the land south of Moss Lane (1 hectare owned by the family of Casa De Flores, Moss Lane, Farington Moss) have been rejected over the last thirty years, due to road access being unsuitable, cost of running services (sewers, drainage, power), road safety compromises and united objections from residents on Moss Lane and Murray Avenue. Have these previous applications been considered when considering changing this land from category D8 “Safeguarded land – not designated for any specific purpose” to developing this site for housing? We believe pressure on South Ribble Council to produce a number of new large housing sites to reach government targets of building new houses is creating poor judgements within the planning of new homes creating dramatic and irrevocable landscape changes.</p> <p>2.4 Until July 2012 this land was noted by the council as “Yellow land” “Safeguarded land – not designated for any specific purpose” and not for residential development. In this class it is noted that “maintenance of the land may be permitted provided that any landscape and wildlife features and access for recreation are protected”. The council has failed to protect this land and a large amount of trees were felled in May 2012. The council were notified of the felling on 22nd May 2012 but I believe nobody from the council has carried out any assessment to the damage done or visited the site. The damage is still visible now, and it is possible to do this assessment now.</p> <p>Why has this land use now changed? Changes have occurred without adequate attempts to notify residents in Moss Lane about the land usage proposed changes. Residents have not received any communication from the Council about this, despite the fact that the land is neighbouring these houses. We have discovered this change after it has taken place and are looking to obtain legal opinion on our rights to have been considered a party that should have been consulted directly. Given the failure to consult adequately on the land use changes, we would ask the Council to carry out a full consultation on the land usage changes now, to avoid lengthy legal processes. Until that point the land use should be returned to protected yellow land.</p> <p>2.5 We would question whether this development can possibly meet any “sustainability” test given the issues raised here.</p> <p>3 The impact of the development will be extremely harmful to the interests and safety of residents of Moss Lane, causing considerable loss of amenity and changing the whole landscape and environment. This will substantially affect the living experience of residents and is likely to result in loss in the value of houses in Moss Lane.</p>

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			<p><b>3.1 Water &amp; Drainage</b> The proposed development threatens existing water drainage provision in Moss Lane. There is a crucially important drainage ditch on the north side and some parts north and south side of the road which would be compromised by any changes to the road layout. These drainage ditches are essential for the movement of water to disperse efficiently and reduce potential flood risk. For many months of the year the front gardens of the houses on Moss Lane are full of water.</p> <p><b>3.2 Noise Disturbance Pollution</b> As well as causing road safety hazards, more vehicles and pedestrians using Moss Lane will cause significant increased noise and disturbance for residents of Moss Lane and completely change the character of a peaceful residential road.</p> <p><b>3.3 Loss of amenity and value will come from:</b></p> <ul style="list-style-type: none"> <li>• Massively increased traffic, compromised road safety.</li> <li>• Massive increase in noise level from the road.</li> <li>• Significant risk to pedestrians, particularly vulnerable pedestrians, including children, disabled and elderly pedestrians. I have a young child and am already very concerned about increasing risk from through traffic.</li> <li>• Massively increased numbers of pedestrians using Moss Lane for access.</li> <li>• Increased flood risk and water drainage problems</li> <li>• The outlook and environment for Moss Lane residents will change considerably as the landscape to the rear has been wildlife, fields and trees.</li> <li>• The current landowner for the land to the south of the Moss Lane houses has in May 2012 felled a large amount of mature trees (damaging a long established wildlife ecosystem. This ecosystem includes a pair of barn owls that live in the trees behind no.11 Moss Lane, a number of wild birds including a greater spotted kingfisher, a nearby colony of bats and a large number of hedgehogs) and has started clearing the land with heavy equipment. This evidence is still visible. As the land was protected / safeguarded by the council as D8, the council have failed to enforce this protection. We would ask that the Council to take note of what appears to be an attempt to pressurise residents and the council by removing these trees / wildlife and outlook and to influence the planning authority, by presenting an already changed environment, perhaps to avoid any environmental assessment and increase opportunity for future housing planning applications.</li> <li>• Increased traffic flow will add atmospheric and air pollution</li> </ul> <p><b>Conclusions</b> The representation document requests suggestions from residents and land owners for planners to consider. The alternative proposals we are making are as follows; 1. We recommend that the proposed development is abandoned for all the reasons identified above. In particular we would add that the countryside in this beautiful area should not be irrevocably damaged and should be properly protected for future generations to use and enjoy. 2. The scale of the proposed development is substantially reduced to a development of less than one hundred houses cited in the space of the original plan but in a less dense arrangement therefore making less houses and satisfying the objections of the Heatherleigh and surrounding residents. 3. Measures are taken to ensure that there is no access to the development from Moss Lane (particularly by vehicles), which could be achieved by making Moss Lane into a no through road and access to the development being exclusively via Heatherleigh at the original location. 4. That the Council should take account of the fact that its decision on land usage is likely to be ultra vires owing to the inadequate consultation with neighbouring residents and needs to run a new full consultation on the proposal to redesignate the land south of Moss Lane.</p>
71	87	Chapter D - Policy D1 - Site S	<p>SR0331 - Brindle Road</p> <p>I would like to take the opportunity to comment on the above alteration to the Local Development Plan. My family and I live on Brindle Road and our home will be adversely affected by the proposal and subsequent development.</p> <p>Brindle Road is still operating on the original sewerage system (unchanged since the 1950's). Since then Moorhey Close, Stephendale Avenue, Greystock Close and more recently, Bluebell Way have all be developed. I wonder just how many more houses can the sewerage system support?</p> <p>You mention that local medical facilities will be able to cope with increased numbers due to housing development, I beg to differ; Ryan Medical Centre is at the point of closing patient lists, and I understand that Roselea Medical Centre is also under pressure.</p> <p>Recent developments have had to have original plans altered to allow easy access to emergency vehicles - I hope that access roads will enable such large vehicles to enter the area safely.</p> <p>Brindle Road is already an extremely busy road. Accidents do happen along it's length; the exit from Withy Trees Avenue onto Brindle Road is dangerous with very limited views of approaching traffic and the roundabout at Bluebell Way is ambiguous when entering the access to Shuttling Fields Lane and drivers often become angry when we cross the roundabout and turn right behind them. Would this mean that there would be yet another roundabout being built at the entry to the new development? Can Brindle Road really be able to cope with all the extra cars?</p>

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			<p>The railway crossing is a cause of serious concern. Many, many cars cross there every day - will the crossing infrastructure be able to cope with so many extra vehicles?</p> <p>I had understood that Public Rights of Way were safe from development. Why then is it mentioned that the recognised footpath will be altered. Is it when it suits a developer?</p> <p>What is "amenity" land and how would this affect the planned development? On Bluebell Way a children's play area was included in the planning application - where is it now? It never appeared - once the houses were finished, the builders just upped and left and the proposed play area is neglected.</p> <p>On a positive note I assume that due to the increased number of properties, our Council Tax will be reduced!</p> <p>Your acknowledgement would be appreciated.</p>
72	88	Chapter C - Policy C3 - Site W	<p>Your highlight plan appears to cover house already on croston road, is this a mistake?</p> <p>Therefore, is there a need to build on this site, when there are other unused site is a concern, and feels like you are just land grabbing</p> <p>The description of type of houses and use is very limited, and needs to be more expansive, or do you not know, or hiding the reason</p> <p>It's indicated to be complete in 15 years, is the build to be done in zones, you must have program.</p> <p>How do you stop hindrance to houses already built.</p> <p>Why do we in Leyland want to destroy our last remaining country side and green field sites, when there is not a need, again this can only be a result of land grabbing.</p> <p>Therefore I object to this application.</p> <p>Best regards and I request a reply to the comments raised</p>
73	89	Chapter C - Policy C3 - Site W	<p>We would like to object to this development on the following grounds</p> <ol style="list-style-type: none"> <li>1. This proposal would increase traffic on the Croston Road. On the accepted calculation of 1.5 cars per household we will see an increase of at least 975 vehicles. At the present time there is speed reducing devices on Croston Road. However, there is still too many vehicles using this road and a large number of cars are parked on the road from Moss lane to the traffic lines south. This increases the noise pollution as well as the increased general pollution due to the fumes. The road safety will be compromised and it would be unsafe for the children living in and around Croston road.</li> <li>2. There are inadequate resident amenities, such as play areas and parks etc. There is no Post Office or any shops in this area. The available sub post office at SPAR shop will be over subscribed.</li> <li>3. A large number of houses being built behind the Croston road area will lead to overshadowing and our house being over looked by the new houses.</li> <li>4. At the present time the road gets flooded after a heavy rain. In addition, the grounds are quite wet during the rainy season. With further development of new houses the ground water level will rise leading to flooding and subsidence, which may damage the properties.</li> <li>5. The existing character of the old houses and the presence of farm land which is a great attraction of Farington Moss will be completely destroyed. The new houses will be completely out of character and will not fit in with the character and appearance of the surrounding area. This development will be so dominant it should not be allowed. We will not be able to enjoy the property in the same way we able to do before.</li> <li>6. The density of housing will be too dense, definitely higher than that found in this area.</li> <li>7. There will be an increase in the number of vermin in the area with more houses being built. The rats and other animals who live in the land will be displaced and will increasingly enter the housing units spreading disease.</li> <li>8. A quiet area with very little light pollution, noise pollution and badly behaved people will turn to an intolerable town area which is exactly the opposite to what we have now.</li> </ol>
74	90	Chapter C - Policy C1 - Pickering's Farm	<p>My objection is partly personal.</p> <p>I have been trying to sell my property, which is in the middle of the proposed development, for over a year. I have sold it twice but the sale has fallen through both times when the buyer has found out about the potential development.</p> <p>We are trying to downsize as the mortgage and bills are crippling but we are unable to sell. We did not know about the potential development when we purchased the house and are now trapped, unless we sell our house for less than it is worth, which we cannot afford to do.</p> <p>Whilst I understand that houses need to be built to meet the housing demands for the area, I feel it is unfair that we have to suffer financially, for the foreseeable future. We are unable to sell</p>

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			<p>now, so I cannot see the situation improving if we are in the middle of a building site for the next 15 years</p> <p>I would be happy to sell to the developer, at a fair market price, but they are not interested due to our plot not being of a significant size. I feel the position of our plot and our access road (Nib Lane), being quite central, would aid in the overall layout of the development.</p> <p>If we are forced to stay due to not being able to sell, I have many concerns for our property, during and after development.</p> <p>We chose our property because of its location and seclusion and the fact we are surrounded by open fields. Once all these fields are built on, we will be overlooked from all directions which will affect our privacy and light. Some of the development will be commercial or industrial which generally means larger building causing more shadowing to our property and gardens. This will have a significant effect on our property value.</p> <p>During construction (which may take up to 15 years) we will be affected by dust clouds from the nature of building sites. This will mean, for the next 15 years, we cannot hang washing out, windows, window frames and the white painted rendered walls will be constantly dirty, our cars will require more frequent cleaning and we will not be able to open our windows on hot days.</p> <p>On a more general note for the area, I really don't feel that the road network could cope with the increased 1,300 (or so) houses. I realise that there is a proposal for the cross borough link road, but I don't think that will help much (see below). The current road network is already at breaking point, with the centre of Lostock Hall and the roundabout at the top of Watkin Lane being gridlocked in all directions at peak times.</p> <p>Also, I don't know how building on all this land is going to affect drainage. During heavy rainfall, all the surrounding fields become water logged and on occasions, completely flood.</p>
74	91	Chapter A - Policy A2	<p>I understand that the cross borough link road is to ease the existing traffic problems and to accommodate the future traffic from the introduction of over 1,000 new houses on the Pickerings Farm and old gas works sites.</p> <p>From living in the area, and with some common sense, you can see the high traffic volume is running north to south or south to north depending on the time of day. This is due to the traffic heading in and out of the centre of Preston City and out to the motorway junctions.</p> <p>I don't understand how building a new east to west link road will ease the traffic heading north and south. Currently, all roads heading north and south (Penwortham Way, Leyland Rd, Wakin Lane, Bamber Bridge Bypass and Station Rd (Bamber Bridge)), become heavily congested at peak times. The roads that head east and west (Coote Lane and Browndge Rd) never have more than a dozen vehicles waiting at a junction and you are soon through.</p>
75	92	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
76	93	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
77	94	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
78	95	Chapter C - Policy C3 - Site W	I wish to register my objection to the development of lands from Heatherleigh to Moss Lane.
79	96	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
80	97	Chapter C - Policy C3 - Site W	<p>I object to the above-mentioned as it adds substantial additional noise and air pollution on top of that already created by local industrial units and A roads.</p> <p>The character of the area is destroyed – changing from semi-rural to urban.</p> <p>There is an abundance of wildlife – foxes, badgers, herons, swans, etc – which will be hugely impacted and the landscape will be detrimentally altered.</p> <p>The increased traffic generated along this overused road, will create additional problems in respect of road safety.</p> <p>I also believe there will be a huge impact on the value and saleability of houses on Croston Road as the unique open land to the rear will have been taken away. This is clearly unreasonable and unfair.</p>
80	98	Chapter C - Policy C3 - Site W	<p>I would like to register my concerns regarding the above-mentioned development proposal.</p> <ol style="list-style-type: none"> <li>1. I believe the development will have a material impact on the value of houses on Croston Road. These houses are currently sought after due to the open land at the rear. This development will steal one of the unique selling points of the houses and reduce both their value and saleability.</li> <li>2. I believe there are already reasons to be concerned about road safety in this area. Speed bumps have been put in over the last few years but the volume and nature of the traffic means the road is a safety hazard and the increased levels created by the development will further compromise road safety.</li> <li>3. The area will have its character changed entirely from semi-rural to out and out urban.</li> </ol>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>4. Noise and air pollution will be unfairly and substantially increased and affect houses that have already had to bear significant odour pollution from previous planning disasters in the area.</p> <p>5. The landscape will be hugely impacted as will the wildlife and both will create a completely different feel to the area.</p> <p>I think an increased visual and odour pollution to the front of the property caused by the waste plant, followed by an increase in the tip size have already started to impinge on and cause substantial detriment to local residents. This development will be a very difficult pill to swallow and I believe it is the planning team's responsibility to ensure one set of residents are not continually attacked by varying proposals.</p>
81	99	Chapter C - Policy C2 - Moss Side Test Track	<p>My main concern is the proposed access to the development via two sites on Longmeanygate. It would appear that it is no coincidence that both these areas of woodland are owned by SRBC. Both of these sites are on bends, one of which has been the site of a very many accidents, three very serious and one fatality. The proposals have not considered safety.</p> <p>My husband and I and our family have lived at XXX Longmeanygate for 45 years. It was once a quiet country laed surrounded by farmland but with advent of CLDC and many compulsory purchases the area underwent a drastic change. This area cannot cope with more traffic and the Wymott brook cannot cope with any more discharge from this development regardless of comments from John Lunt.</p> <p>We realise we cannot halt progress but we must have good public service links – the re-opening of Midge Hall station is essential and should be a condition of the passing of these plans.</p> <p>We therefore suggest a roundabout at the junction of Longmeanygate and Midge Hall Lane with the access road by the Methodist Chapel, away from bends, and leading onto Midge Hall Lane which would take Preston traffic via the Longton bypass. As you said there is money available to improve these roads.</p> <p>My concerns are to keep our children, grandchildren and the many people who regularly take their life in their hands by taking a walk along Longmeanygate where there are no footpaths, safe.</p> <p>I sincerely hope that all comments are noted and acted upon.</p>
82	100	Chapter G - Policy G3	<p>Safeguarded Land off Emnie Lane, Leyland</p> <p>This presents suitable areas (subject to land "fitness for purpose" assessment by an accredited organisation) for the provision of an outdoor sports facility (cricket).</p> <p>Leyland CC in conjunction with Leyland Fox Lane Sports Club (LFLSC Community Hub), offer the capability to provision, manage and maintain a cricket ground additional to that ground existing at their Fox Lane base.</p> <p>An adjacent linked hockey facility can be likewise administered as required.</p>
82	101	Chapter H	<p>Leyland CC/LFLSC offer to work in close collaboration with South Ribble Local Authority to achieve their three Core Strategy Objectives.</p> <p>Achievement of these objectives will be helped by an investment in the provision and maintenance of a new (additional) outdoor sport resource for cricket (and possibly hockey).</p> <p>Further enhancement of health, community services and facilities would be achieved by the development, adjacent to the new sports ground, of a walk and cycle way which could be located to form an integrated system from within and outside the Borough.</p>
83	102	Chapter C - Policy C3 - Site W	<p>I am strongly objecting to the plans for building on the land directly next to my property at the end of Murray Avenue Farrington Moss.</p>
84	104	Chapter D - Policy D1 - Site P	<p>We would like to object to the proposed plans for residential development behind Altcar Lane in Leyland. Our main objections to this are as follows:</p> <p>This land is a vital part of the ecology surrounding Worden Park. It is home to an abundance of breeding wildlife including bats, kestrels, pheasants, woodpeckers, nuthatches and owls as well as foxes, squirrels, field mice and probably numerous other hidden species. Having lived previously on a new housing development, even common British birdlife does not return to these areas for many many years. We do not feel increasing Worden Park will come even close to compensating for the destruction of the habitat of the abundant wildlife already here. This local ecology and landscape attracts visitors to the area, including many walkers, who already have access to Worden Park itself. Building on this local land would restrict this enjoyment to just the park itself, when what attracts a lot of people is the local area, not confined to park boundaries. We feel this would massively reduce the attractiveness of this area of Leyland as a place to visit.</p> <p>The fields behind Altcar Lane are actively used by local farmers, for sheep, cattle and horses co-existing with local wildlife. Any building on this land would take away land from the local farms which would have a major impact on their businesses. Losing such good local business would not be good for Leyland, at a time when local produce is more important than ever.</p> <p>Our house, The Cottage, is situated on Altcar Lane, and is approximately 150 to 200 years old. We understand it is the gamekeeper's cottage originally attached to Worden Park. Our neighbouring houses consist of old character properties and working farms with open aspects to countryside. Any development would significantly reduce the values of our property and in excess of 30 other surrounding properties in the areas around these fields, in turn reducing the desirability of Leyland as being a prosperous and attractive area to move to. Building houses directly in the fields</p>

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			<p>behind Altcar Lane will have an undesirable impact on the local character of this area. The cottage itself is set approximately 4 feet below the level of the adjacent field, and any building in this particular field would overlook our house. The increased amount of residential properties would also increase traffic immensely around such attractive quiet countryside.</p> <p>We would be grateful if these points and those of all the local residents could be considered carefully when making a decision on these proposed plans.</p>
84	386	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
84	387	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
85	105	Consultation Process	<p>My first objection is not against the publication per se, but on the public consultation and how I feel this has been poorly communicated to residents who its proposals will have a direct and significant impact. As a resident of Bannister Lane who will be directly impacted upon, as an adjoining landowner, from one of the three proposed major development areas, I have not received any direct communication from the council of these proposals. The first I and other neighbours became aware of the proposals (which are now in the final stages of production according to Figure 1 'Development Plan Document Stages') was from local residents carrying out leaflet drops to try and raise awareness.</p> <p>As a resident of Bannister Lane since 2008, I have not received any communication prior to this document, and certainly was not invited / involved in the 'eight week public consultation exercise' which is claimed to have taken place in section 2.6. Again this would appear to have been insufficient in comparison to the scale of changes proposed. And the response from the council representative (Zoe Harding) at Booths supermarket in Longton on Tuesday 10th July regarding this issue is an unacceptable excuse claiming that it would be "...too expensive to write and consult with neighbouring residents."</p>
85	106	Consistency	My second observation is more of a consistency issue. In section 3.4 it sets out the 'Major Sites for Development' which excludes Land Between Heatherleigh and Moss Lane, Farington (which in itself is also an error as part of Heatherleigh and all of Moss Lane fall within the parish of Farington Moss' not 'Farington', which is a separate parish) which is later referred to as one of the three major residential sites for development.
85	107	Chapter C - Residential Led Sites	My third objection is about the choice of suitable sites for major residential development. In a borough of 11,461 hectares it is irresponsible to consider proposing two of the three major residential developments Policy C2 and C3 (a combined total of 1350 houses) within 1km of each other. Regardless of any proposed phasing, the eventual consequence is going to be an extra 1350 houses within an already heavily populated area, and all probably bringing with them an average of 2 cars per household pouring onto the already congested Flensburg Way, and associated minor roads at peak times. The distribution of significant new development has not been fairly distributed across the borough.
85	108	Chapter C - Policy C3 - Site W	<p>My fourth objection specifically relates to Policy C3 and information contained in paragraphs 6.23-6.25. The area this policy relates to is identified as 'W' on the proposals map. This proposal would have a significant and detrimental impact on the residents of Moss Lane, Croston Road, Bannister Lane and Heatherleigh Way. It is also proposing to have an impact and loss on local businesses, namely loss of farmed agricultural land by J Bennett at Model Farm, Croston Road, Farington Moss and loss of glass houses and associated buildings necessary to AW Noblett horticultural nursery supply business.</p> <p>When purchasing the properties along Bannister Lane, the residents (some of 20+years) purchased the houses for the quiet, semi-rural and no-through road position. These proposals would entomb Bannister Lane on both sides into a glorified housing estate. And as a consequence there will undoubtedly be a negative impact on the value of our properties; putting a further squeeze onto everyone's already stretched financial situation, as a result of the current recession.</p> <p>It is also difficult to see how the proposals would be able to retain the green corridors already in situ, providing valuable wildlife habitat and foraging routes for birds and bats. Which is a further recommendation within the document (Policy G10, 12 and 13) and in doing so contradicts itself.</p> <p>If there can be any positive of Policy C3 it is the statement that 'there is to be no access to the site from Bannister Lane.' This is all well and good but needs to be upheld, should this policy be passed, as LeaHough Chartered Surveyors are already proposing to submit an outline planning application for land between Heatherleigh and Bannister Lane, with which they propose to have a 'small area of development served off Bannister Lane with upgraded road and turning facility.'</p> <p>Therefore I would object to the proposed housing on site 'W' but instead favour, if there needed to be a major residential development within the Farington moss general area, the proposals at site 'FF' as defined in Policy C2. The reasons being, that this area is not already surrounded by residential properties, therefore it would not adversely impact on residents well being and livelihood; and it is an area that is currently derelict and would have a better use than the loss of agricultural land.</p>
86	109	NPPF	<p>Relationship to Other Planning Guidance – 2.16-2.18 (inclusive), page 4.</p> <p>The finalised NPPF is significantly different than the 'draft' NPPF, representing lobbying success on the part of organisations like the Council for the Protection of Rural England and the National Trust..</p> <p>The main points in the finalised NPPF are the following:-</p> <ol style="list-style-type: none"> <li>1. It gives a strong emphasis to 'town centre first' policy development.</li> <li>2. The retention to build on 'Brownfield sites first rather than on unspoilt green spaces is maintained.</li> <li>3. The intrinsic value of localism has been added as a core principle of planning.</li> <li>4. There is transitional protection for local authorities with their current planning laws, which now have 12 months to finalise their local plans.</li> <li>5. Balanced approach to sustainable development (the 'definition' of sustainable development is still open to much interpretation and is likely to become the subject of legal battles). My own</li> </ol>

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			<p>interpretation is that 'sustainable' is certainly not based on purely economic considerations (it is pointless building houses that will never sell and where there are existing properties) but for example, could be the small carbon footprint 'eco' house design in urban areas where there is existing lighting.</p> <p>Secondly, at the recent Core Strategy hearing, one property developer made the comment that he recognised 'market opportunities' to develop on unspoilt green spaces, but this does not constitute 'sustainable' development. No persons/organisations should gain at the expense of despoiling a local environment if material gain is the sole motivation and where there would be no benefit whatsoever to local people. Also the comment was made that existing Brownfield sites are unattractive to develop from, but I would have thought that any professional developer should have the expertise to do so!</p> <p>6. A more explicit against 'Greenfield' development is stated.</p> <p>7. Protection against development in the Green Belt is maintained.</p> <p>8. An explicit of the value of the countryside is stated.</p> <p>9. There is a stronger emphasis on the role of good design with redrafting of the standards &amp; viability section.</p> <p>It is therefore important to ensure that the distinction between the draft &amp; the current finalised NPPF is maintained as SRBC's record on Brownfield development is very poor and that 37% of housing was built in recent years as a result of so-called 'garden grabbing' in villages, so creating inappropriate urban sprawl in a village environment.</p> <p>There must be no misinterpretation or any selective interpretation of the finalised NPPF.</p>
86	110	Vision - Rural Local Service Centre - page 8	<p>Longton is described as a rural local service centre, however it is in fact a village. I note that the adjective rural is used.</p> <p>The document states that Longton is well placed for future employment and housing needs, but Longton has already been over-developed by housing stock and does not have the capacity at present nor in the future to cope with the increase in traffic volume that this would entail.</p> <p>The pressure to build new housing stock in Longton and other rural/semi-rural areas is attempting to make some kind of housing shortfall for the lack of development on Brownfield sites in the Borough.</p>
86	111	Chapter C - Policy C5 – BAE Systems, Samsbury	<p>As stated in my objection to the so-called 'rollback' of the Green Belt, the DCLG does not sanction this (letter received from DCLG with copy to Lorraine Fullbrook, MP) despite the fact that the Treasury approved that the Enterprise Zone for Salsbury.</p> <p>Therefore, I reiterate that this is an inappropriate use of the Green Belt according to the DCLG.</p> <p>It also contravenes proposed Policy G1 (page 56).</p> <p>There is no justification of the Enterprise Zone in the finalised NPPF.</p>
86	112	Chapter E - Policy E5	<p>My comment is the use of the term 'local centres'. These are in fact villages. It is important to make the distinction between the rural (villages of varying sizes) and urban environments (towns).</p>
86	113	Energy Efficiency of New Developments – page 84	<p>Lancashire County Council may have a statutory right to install street lighting in new developments, but there is no legal requirement (statutory obligation) for street lighting, therefore planning permission must be sought by property developers to install street lighting if the road in the development reaches adoptable standards. Unnecessary lighting contributes to global warming and causes light pollution. The requirements of the Wildlife &amp; Countryside Act must be considered in relation to protected species &amp; street lighting.</p> <p>Street lighting for new developments should not be provided out of council tax funding</p>
86	115	Chapter D - Policy D1 - Sites M, V & X	<p>Longton already is viable as a thriving village and needs no further development to support &amp; maintain the services that it provides. It certainly does not have the capacity to support the increase of volume in traffic that any further development would entail.</p> <p>These Greenfield sites ought to be used for agricultural purposes so that people can grow produce for local consumption.</p> <p>Brownfield sites must be used for housing development first.</p>
86	116	Chapter D - Policy D1 - Site Q	<p>This small Greenfield site would be appropriate for 10 proposed dwellings in the last resort in the absence of available Brownfield land, without having an adverse effect on the local environment, as long as necessary mitigating measures are implemented to protect wildlife species</p>
87	117	Chapter G - Policy G12	<p><b>Introduction</b> This representation is made on behalf of Thomas Mawdsley Builders in relation to Policy G 12 in relation to land north of Mayfields, Rhoden Road, Moss Side , Leyland.</p> <p><b>Context</b> Policy G 12 Green Corridors, appears on the face of it to be a direct replacement for Policy D 10 Green Wedges contained in the old South Ribble Local Plan. As a planning officer employed by South Ribble BC at the time that the local plan was being prepared and 'defended' during the Public inquiry, I was actually involved in the Inquiry process on housing allocation sites and Green Wedges, though not this particular one.</p> <p>The purposes of D 10 have essentially been repeated in Policy G 12 and in relation to the client's site this remains an issue. Policy G 12 states:</p> <p>Policy G12 – Green Corridors Development will not be permitted in areas designated as green corridors (as shown on the proposals map), which would prejudice their open character, visual amenity and purpose. Development may be permitted, in very exceptional circumstances, if it can be demonstrated that the proposal would have significant community and environmental benefits and measures can be provided to compensate for the loss of the Green corridor within the area.</p> <p><b>Justification</b> 10.65 Part of the quality of the environment derives from the presence of open areas and the separation between developed areas. Green corridors are to remain as significant features of the built-up areas. The green corridors form part of the Council's overall policy of protecting and enhancing the natural and built environment.</p>

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			<p>10.66 Green corridors have the following characteristics: an undeveloped and open nature, adjacent or within an urban area and form part of the wider Green Infrastructure network as set out in Policy G7.</p> <p>10.67 Green corridors may already contain some development but further development will only be permitted in very exceptional circumstances, where the development would not significantly detract from the open character of the land. The scale, siting and design of any built development should reflect the need to retain the general open character of a Green Corridor.</p> <p>NPPF Running as a golden thread through the NPPF is the principle of sustainable development which is defined as follows: “There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles: ●●an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure; ●●a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and ●●an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.”</p> <p>Para 113 states “Distinctions should be made between the hierarchy of international, national and locally designated sites,24 so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.”</p> <p>Para 114 states “ Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and.....”</p> <p>Comments It appears to me from both a sustainable use of urban land and a land use planning perspective that in reality, the inclusion of my client’s site and that on the opposite side of the road are either simply because they link the Green Corridor alongside Schleswig Way with that around the Test track centre and/or it provides a noise buffer around Rhoden Road industrial estate and the noise issues that have emanated from there in the past.</p> <p>The area alongside Schleswig Way as a Green corridor is understandable. The area around the test track is understandable, both are predominantly parkland. The area between including my client’s site less so, and it does appear that it has been included for noise attenuation measures rather than because it contributes to the `Green Corridor`.</p> <p>This is a sustainable site for development within an urban framework, and meets the tests of sustainability contained in the NPPF. However, Policy G12 and its predecessor D10 are restrictive policies that prevent development which would be acceptable in all other urban circumstances and yet the site itself (in my client’s case) is inward rather than outward looking and as such does not contribute to the green environment, because views into it or through it are effectively non-existent. Inspector’s at appeal have commented in the past that people walking alongside Rhoden Road would benefit from its visual amenity, which is hard to understand having walked it myself. Unlike Rhoden House, opposite, you can’t see into it unless you stop at the access gate! If visual continuity is all important then Green corridors would all link in with each other. They do not! The designation of Green corridors is always going to be subjective but like Green Belt boundaries they should be reviewed regularly and not just left in perpetuity. I have yet to see a statement from the LPA which attempts to justify the inclusion of my client’s land within the Green Wedge or Green Corridor other than on the grounds of visual continuity (i.e. it’s already in and should remain so) . However, I have never seen an argument as to what that continuity contributes to the wider green infrastructure.</p> <p>My clients respectfully request that this site (identified in red on the attached plan) be removed from the Green Corridor.</p>
88	118	Chapter G - Policy G7	<p>Places for people object to the designation of the site at known as The Maltings as Green Infrastructure – Existing Provision. The site should be allocated for housing development or as white land.</p> <p>These representations are made on behalf of Places for People the owners of The Maltings on Hill Road South, Penwortham – see attached plan.</p> <p>Summary:</p> <p>Places for People object to the designation of the Maltings as Existing Green Infrastructure – PolicyG7 - on the Publication Draft Proposals Map. The designation should be deleted from the site and the site shown as a housing allocation or white land on the Local Plan proposals map.</p> <p>Background</p> <p>The Maltings is a block of 133 one bed flats currently let as affordable housing to predominantly single people on low incomes. The building was originally designed as student accommodation in the 1970’s for students attending Preston University. It is an old and tired building and not capable of being economically refurbished to modern residential standards. As the condition of the building deteriorates it has become a discordant element in the local area.</p>

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			<p>Over the past 18 months Places for People have been working with the Council to agree the principles for the redevelopment of the entire site. To reduce the uncertainty in the planning process, the Council has suggested that Places for People prepare a planning and development brief that sets out the main planning requirements for any redevelopment of the site and also provides guidance on the form and scale of development. The brief will not be formally adopted but the objective is to have it agreed with officers and members.</p> <p>A draft development brief has been prepared and submitted for comment to the Council. It is anticipated that the brief will be finalised in late summer 2012.</p> <p>The Council have been aware from the outset that the proposals for the redevelopment of the site involved a lower density family housing scheme across the whole site that was more in keeping with the character of the surrounding area than the existing high density residential block.</p> <p>Justification</p> <p>Paragraph 10.45 of the document defines Green infrastructure. However, there is no explanation of the process by which land is characterised as Green Infrastructure or how the private residential green space at the Maltings came to be defined as Green Infrastructure.</p> <p>The defining characteristic of the areas of land identified as Green Infrastructure is that they are either in public ownership or are areas to which the public have free access or, in some cases, controlled access. The extent to which the green space at the Maltings rates against the categories identified in Paragraph 10.45 of the document is set out below:</p> <p>[Table included in representation form here]</p> <p>The private green space on the Maltings site does not fall into any of the categories identified. It is space that is an integral part of the residential use of the site. As it is not garden space, the green space falls within the definition of previously developed (Brownfield) land in the National Planning Policy Framework.</p> <p>The extent to which public use is a defining characteristic of Green Infrastructure is confirmed by paragraph 10.48 of the publication document which states that:</p> <p>Development will only be permitted where it is essential to enhance Green Infrastructure and/or a connected facility which will ensure greater public use and access.</p> <p>This theme is further confirmed by the Justification for Policy G8 ‘Green Infrastructure and Networks – Future Provision’ that sets out a vision of Green Infrastructure providing for:</p> <p>various recreational uses in a development accessible to and used by the public.</p> <p>This is not the case with the Maltings which is a private residential site. There is no right of public access to the site nor is there any intention of granting public access to the site in its current use.</p> <p>There is a significant amount of public open space already within the local area to which the public have unrestricted access.</p> <p>The existing open green space on the site is part of the residential use of the site. The residential use is concentrated in a high density block of 133 units. The open green space is therefore an important component of any redevelopment of the site that will, of necessity, involve the provision of an element of green space on the site.</p> <p>However, designation of the open green areas on the site will prevent sensible and much needed redevelopment of the site. Restricting the development potential of the site to the footprint of the existing building limits the redevelopment options on the site. Redevelopment is likely to be restricted to other forms of high density development that are not viable in the current market in which case the existing building could remain vacant on the site for some time until a viable alternative scheme is identified.</p>
89	119	Chapter D - Policy D1 - Site S	<p>Persimmon Homes control approx 9.6ha of Site S which would be available for immediate delivery. We continue to support the allocation of Site S for housing.</p> <p>Policy D1 including Table 1 and Table 2 conclude the 22.7ha site can only accommodate 250 units and this supply will come forward in the two later phases of the plan period – 150 units between 2016 and 2021 and 100 units between 2021 and 2026.</p> <p>In earlier versions of the plan the site’s capacity was considered to be 375 units. It has now been reduced to 250 units on the grounds of motorway noise.</p> <p>Following our representations to the Preferred Options stage (reference 211) further masterplanning work has been undertaken. Please refer to the Concept masterplans CON-01 dated August 2012 and Site Plan Technical Data dated August 2012 which support this representation.</p> <p>The masterplan layout accommodates “no build” zones around its periphery to create sufficient buffer room for noise mitigation. Please see supporting letter from WYG dated 13th August 2012.</p> <p>The potential developable area of Site S would be c.18.7ha. Assuming 3ha of open space would leave approximately 15.7ha of net developable area. At 30 units to the hectare this would equate to c.470 units. You will note from the masterplans the Persimmon site alone could accommodate 286 units.</p>



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			We therefore request that Policy D1 be reviewed and amended to accommodate a more realistic (or less pessimistic) quantum of units on Site S to c. 400 units and given Persimmon Homes' interest acknowledge that 150 units would be immediately available in the first phase of the plan period (2010 to 2016).
90	120	Chapter C - Policy C3 - Site W	<p>Our clients control a proportion of this wider strategic site. Their interest is specifically shown on the plan enclosed with these representations. We support the inclusion of the wider site within the emerging DPD. Policy D1 states that the site could accommodate 600 dwellings within the plan period. Our client's land would provide some 150 dwellings of this capacity.</p> <p>We consider that there should be flexibility and that the number of dwellings should be specifically referred to as a minimum. This should either be in the policy itself or in the supporting text. This provides flexibility should the masterplanning exercise actually deliver a greater site capacity. It also provides greater flexibility should there be a need to deliver a greater number of dwellings should the housing requirements increase, as may well be the case following the publication of the 2011 Census data. This may require additional sites although that is not the role of the Site Allocations DPD. Therefore subject to site specific assessment, minimum requirements for each site would provide an element of flexibility in the short term.</p> <p>The table on page 33 splits the delivery of the site into three phases, with 200 dwellings from each site per annum. This equates to 40 dwellings per annum. We consider that this should not be strictly adhered to as there is likely to be a number of developers on this site and their 2 delivery rates should not be restricted. Therefore the policy should clearly state that these requirements are a minimum and can be exceeded. An earlier delivery of this site would only assist the overall housing position of the council.</p> <p>Policy C3 specifically relates to this site. Three criteria are set out, these being:</p> <ul style="list-style-type: none"> <li>· an agreed master plan for the comprehensive development of the site, to include the provision of residential development with scope for community and leisure facilities if required by the council within the plan period;</li> <li>· a phasing and infrastructure delivery schedule;</li> <li>· an agreed programme of implementation in accordance with the master plan and agreed design code. We agree that a masterplan is prepared for the key land interests across the site. This support is based on that exercise being undertaken as soon as possible so that the site can deliver early in the plan period. Paragraph 6.25 states that access to the site must be from Croston Road, Heatherleigh and Moss Lane. It states that there is to be no access to the site from Bannister Lane. We contest this position and request that this specific requirement is deleted from the plan. We consider that there is no justification for such a restriction, and the submissions (copy enclosed) by our client's highway consultants demonstrate why this is not necessary. In summary, the conclusions are:</li> </ul> <ul style="list-style-type: none"> <li>· it would provide greater integration with the existing urban area;</li> <li>· technically the proposed development can be easily accessed off Bannister Lane, with some localised widening;</li> <li>· the layout of Bannister Lane with the proposed widening would fully accord with the latest highway design standards/guides;</li> <li>· in terms of capacity, the existing Bannister Lane/Croston Road junction can easily accommodate the additional development traffic;</li> <li>· the proposal for the limited 150 houses will be suitably integrated with the wider allocation site by facilitating through pedestrian and cycle movement along a 'green lane' type route from north to south. There will be no physical vehicular route via the site through to Flensburg Way/Penwortham Way;</li> <li>· the proposals will not prejudice the overall masterplan approach to the development of the wider allocation site;</li> <li>· given the large size of the wider site and its location, it would be preferable to have multiple access points to increase permeability and integration of the overall site by all modes of transport; and,</li> <li>· the proposed access off Bannister Lane will also assist in integrating the existing dwellings on Bannister Lane to the wider proposals in this area.</li> </ul> <p>In addition, a public exhibition is to be held on southern part of the wider site on Tuesday, 14th August 2012. As part of this public exhibition, a master plan has been produced which shows an area of development accessed directly off Bannister Lane. We understand this has been agreed in discussions between the landowner in that case and the council. This clearly demonstrates that Bannister Lane is appropriate for a level of development. Our submitted 3 highway report confirms that circa 150 dwellings could be accessed from north of Bannister Lane.</p> <p>Our key conclusions resulting from these representations are as follows:</p> <ul style="list-style-type: none"> <li>· we support the allocation of Site W (Land between Heatherleigh and Moss Lane, Farington);</li> <li>· we support the criteria in policy C3 provided the masterplanning process is undertaken expeditiously;</li> <li>· we object to the reference that there should be no access to the site from Bannister Lane. This should be deleted from paragraph 3.25;</li> <li>· we support the allocation of site Q (rear of Chapel Meadow, Longton); and,</li> <li>· Site BB can now be allocated for residential development following further assessment on noise pollution.</li> </ul>
90	121	Chapter D - Policy D1 - Site Q	We support the allocation of this site within the emerging DPD. We can confirm that the site is available, suitable and achievable for development in the next 5 years as confirmed in the 2010 SHLAA (Ref LHU1).

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			<p>Substantial technical work</p> <p>Our key conclusions resulting from these representations are as follows:</p> <ul style="list-style-type: none"> <li>· we support the allocation of Site W (Land between Heatherleigh and Moss Lane, Farington);</li> <li>· we support the criteria in policy C3 provided the masterplanning process is undertaken expeditiously;</li> <li>· we object to the reference that there should be no access to the site from Bannister Lane. This should be deleted from paragraph 3.25;</li> <li>· we support the allocation of site Q (rear of Chapel Meadow, Longton); and,</li> <li>· Site BB can now be allocated for residential development following further assessment on noise pollution.</li> </ul>
90	122	Site BB	<p>This site was allocated within an earlier draft of the emerging DPD for residential development. However in the report to Cabinet dated 13th June 2012, two proposed amendments were made, one of which was for site BB to be deleted as a residential allocation for 30 dwellings. The reasons given were that the site is adjacent to the motorway and a recent noise assessment shows that noise levels would be too high for dwellings in that location. It was however left as an unallocated site within the existing built up area which would enable development to come forward if necessary should there be a technical solution to help mitigate noise levels from the motorway. At this stage we welcome the acknowledgement that the site should be included within the urban area, and the acceptance that development can come forward provided that a technical solution can be achieved. Further noise investigations have been undertaken on this site and a technical solution can be achieved. This noise report has been submitted to the council and the council's Environmental Health Officer is content with the proposed solution and confirmed that the site can be developed. Therefore the site can now be reallocated as a residential allocation for around 40 dwellings in the next version of the plan.</p> <p>Our key conclusions resulting from these representations are as follows:</p> <ul style="list-style-type: none"> <li>- we support the allocation of Site W (Land between Heatherleigh and Moss Lane, Farington);</li> <li>- we support the criteria in policy C3 provided the masterplanning process is undertaken expeditiously;</li> <li>- we object to the reference that there should be no access to the site from Bannister Lane. This should be deleted from paragraph 3.25;</li> <li>- we support the allocation of site Q (rear of Chapel Meadow, Longton); and,</li> <li>- Site BB can now be allocated for residential development following further assessment on noise pollution.</li> </ul>
90	124	Chapter C - Policy C3 - Site W	<p>Our key conclusions resulting from these representations are as follows:</p> <ul style="list-style-type: none"> <li>· we support the allocation of Site W (Land between Heatherleigh and Moss Lane, Farington);</li> <li>· we support the criteria in policy C3 provided the masterplanning process is undertaken expeditiously;</li> <li>· we object to the reference that there should be no access to the site from Bannister Lane. This should be deleted from paragraph 3.25;</li> <li>· we support the allocation of site Q (rear of Chapel Meadow, Longton); and,</li> <li>· Site BB can now be allocated for residential development following further assessment on noise pollution.</li> </ul>
91	125	Chapter C - Policy C3 - Site W	<p>I feel that this proposal would greatly increase traffic on all local roads e.g. Croston Road and Bannister Lane, compromising road safety which is already a problem on these roads. Bannister Lane in particular has dangerous access onto Croston Road. I have just returned from the Public Consultation session held by Leigh Hough who are submitting a planning application for 350 houses on part of the site. Their plan includes 18 new houses with access onto Bannister Lane along with footpath and cycle path access even though the South Ribble Master Plan states in paragraph 6.25 "Access to the site must be from Croston Road, Heatherleigh and Moss Lane. There is to be no access to the site from Bannister Lane."</p> <p>The proposed plans will totally ruin the character of this semi-rural area by loss of landscape and wildlife, and increase noise and air pollution. It will also mean a loss of value of properties in the area as the houses are currently surrounded by large areas of open land which is a great selling feature and was the reason that most of the current residents invested their hard earned money and life's in this area.</p>
91	284	Chapter C - Policy C3 - Site W	<p>I am writing to you as our District Councillor - whom I voted for, to ask for your support in objecting to the proposed mindless destruction of green space to the west of Croston Road, Farington Moss for the development of some potential 650 houses.</p> <p>The proposed plans will totally ruin the character of this semi-rural area by loss of landscape and wildlife, and increase noise and air pollution. It will also mean a loss of value of properties in the area as the houses are currently surrounded by large areas of open land which is a great selling feature and was the reason that most of the current residents invested their hard earned money and life's in this area.</p> <p>I feel that this proposal would also greatly increase traffic on all local roads e.g. Croston Road and Bannister Lane, compromising road safety which is already a problem on these roads. Bannister Lane in particular has dangerous access onto Croston Road. I have just returned from the Public Consultation session held by Leigh Hough who are submitting a planning application for 350 houses on part of the site.</p> <p>Their plan includes 18 new houses with access onto Bannister Lane along with footpath and cycle path access even though the South Ribble Master Plan states in paragraph 6.25 "Access to the site must be from Croston Road, Heatherleigh and Moss Lane. There is to be no access to the site from Bannister Lane."</p> <p>I strongly feel that this development should be stopped and better use made of 'brown field' sites, if there is a need for additional housing in South Ribble.</p>
92	126	Chapter D - Policy D1 - Site S	<p>It has come to my attention that you are considering development of the land behind my property on Brindle Road. I am writing to voice my concerns if this was to go ahead.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>Years ago we were told that the sewers would not manage with much more housing. Since then Bluebell Way has gone up, Cottage garden centre, and there are plans to develop land the other side of the railway crossing past the hospital inn. To my mind the sewers have not been extended ? ?</p> <p>The privacy would be lost and the value of my property would be compromised that's for sure.</p> <p>At present the traffic and noise on Brindle Road has been increased so much so that I have difficulty most days to get out of my drive ! What about education? Are there plans for more schools?</p> <p>I feel that there are so many other places housing could be more appropriate.. Why spoil the green areas is this down to VAT for the builders? Isn't less for green areas than brown ones?</p> <p>We have already coped with all the extra houses Please Do NOT let this permission be grante</p>
93	127	Chapter B - Policy B1	<p>Even urban sites can be important in terms of biodiversity and it is recommended that the following additional criteria are added to the policy: d) Protects, conserves and enhances the biodiversity of the site.</p>
93	128	Chapter B - Policy B2	<p>It is recommended that the following criteria be added to the policy: c) Protects, conserves and enhances the biodiversity of the site.</p>
93	129	Chapter B - Policy B3	<p>It is recommended that the following criteria be added to the policy: d) Protects, conserves and enhances the biodiversity of the site</p>
93	130	Chapter B - Policy B4	<p>It is recommended that the policy be subject to the proviso that the development protects, conserves and enhances the biodiversity of the site.</p>
93	131	Chapter B - Policy B5	<p>It is recommended that the following proviso be added to the policy: c) harm the biodiversity of the site.</p>
93	132	Chapter B - Policy B6	<p>There is no reference to the development needing to be in accordance with the policies or proposals of the local plan as a whole. There is also no reference to ecology or biodiversity (other than in a landscape context). It is recommended that the following additional criteria be added to the policy:</p> <ul style="list-style-type: none"> <li>• The development is in accordance with all other policies in this Local Plan.</li> <li>• The proposal protects, conserves and enhances the biodiversity of the site.</li> </ul> <p>The latter criterion would help to ensure compliance with the National Planning Policy Framework.</p>
93	133	Chapter C - Policy C1 - Pickering's Farm	<p>It is recommended that the following criteria be added to the policy: d) The Masterplan including an assessment of the ecology of the site and how its biodiversity will be protected, conserved and enhanced.</p>
93	134	Chapter C - Policy C2 - Moss Side Test Track	<p>It is recommended that the following criteria be added to the policy: d) The Masterplan including an assessment of the ecology of the site and how its biodiversity will be protected, conserved and enhanced.</p>
93	135	Chapter C - Policy C3 - Site W	<p>It is recommended that the following criteria be added to the policy: d) The Masterplan including an assessment of the ecology of the site and how its biodiversity will be protected, conserved and enhanced.</p>
93	136	Chapter C - Policy C4 - Cuerden Strategic Site	<p>It is recommended that the following criteria be added to the policy: d) The Masterplan including an assessment of the ecology of the site and how its biodiversity will be protected, conserved and enhanced.</p>
93	137	Chapter C - Policy C5 – BAE Systems, Samlesbury	<p>The revised Samlesbury Aerodrome BHS boundary was agreed between the Biological Heritage Site Partnership (Lancashire County Council, Natural England and The Wildlife Trust) and BAE systems at the start of 2011.</p> <p>Although this site was approved during the 2010 Biological Heritage Site (BHS) annual review, it is understood that the review currently remains to be signed off by Lancashire County Council. We would suggest that the Local Wildlife Site boundary be added to the 'Map 1' associated with the proposed LDF Policy C4 to improve certainty.</p>
93	138	Chapter C - Policy C5 - Paragraph 6.39	<p>Account also needs to be taken of the presence of the BHS, Lowland Meadows (a Habitat of Principal Importance in England as defined by the NERC Act 2006) and populations of breeding birds, in particular the Lapwing (<i>Vanellus vanellus</i>). Other notable species include Reed Bunting, Skylark, Oystercatcher and Brown Hare. A pond within the site supports Great Crested Newts, which are a European Protected Species.</p>
93	139	Chapter D - Policy D1	<p>The allocation of site 'R' (Land off Wesley Street) includes the former mill lodge, grassland and woodland areas, which should be excluded from the development site. The area should be mapped as part of the ecological network of South Ribble and a site management plan should be produced and implemented as part of a section 106 or CIL agreement for the development of the derelict mill buildings.</p> <p>A part of site 'Z' at Lostock Hall Primary School includes an area of woodland, which should be excluded from the development site.</p>
93	140	Chapter D - Policy D1 - Table 2 - with permission	<p>The 'Residential with Permission' area 'A' overlaps with Worden Wood BHS (Ancient Woodland Wd1). Has there been appropriate mitigation and compensation?</p> <p>The 'Residential with Permission' area 'GG' is adjacent to Preston Junction BHS and LNR. Is there an appropriate buffer zone adjacent to it?</p>
93	141	Chapter E - Policy E1	<p>Site 'd' (North of Lancashire Business Park) includes Habitats of Principal Importance in England (Lowland Meadows, Rivers, Hedgerows and Ponds), which will have to be mitigated and</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			compensated for such that there is a new gain in biodiversity in accordance with requirements paragraphs 9, 17, 109, 117 & 118 of the National Planning Policy Framework.
93	142	Chapter E - Policy E2	Our records show Site 16 (Carr Lane, Farington to overlap with a Biological Heritage Site (reference 52SW07). If this is correct the boundary of the Employment Site should be amended to exclude the BHS. The policy should be subject to the proviso that any development must protect, conserve and enhance the biodiversity of the protected employment areas and sites.
93	143	Chapter G - Designated Environmental Sites	The designated environmental sites referred to in paragraphs 10.12 - 10.17 and listed in Appendix 7, don't include Samlesbury Aerodrome which would bring the current total to 67.
93	144	Chapter G - Designated Environmental Sites	Paragraph 10.20 states that "All sites with international, national and local environmental designations are recognised by the Core Strategy and are given a level of protection from any adverse impacts of development through Core Strategy Policy 22. However, this is not backed up in a policy in this DPD. The Trust believes that there should be a presumption set out in this document against development which would adversely affect such designated sites. There should also be some clarification of the circumstances where such adverse affects may be outweighed by other consideration and the mitigation measures that would be expected. Furthermore, none of the policies refer to European Protected Species and other species with legal protection or that are a material planning consideration (see NERC Act 2006).
93	145	Chapter G - Green Infrastructure - Introduction	Paragraph 10.46 states "The Council is committed to protecting and enhancing the Green Infrastructure network across South Ribble, as it ... protects natural habitats and species...". However, Green Infrastructure is defined in 10.45 as a list of 11 features (shown on the Proposals Map). Hence those natural habitats and species that occur in one or more of the 11 features may be protected, if shown on the Proposals Map, but those natural habitats and species that occur outside of the 11 features and/or aren't shown on the Proposals Map are NOT protected. It is recommended that a more appropriate definition of Green Infrastructure is used in the DPD.
93	146	Chapter G - Policy G2	The policy needs to ensure that biodiversity is protected, conserved and enhanced in accordance with the National Planning Policy Framework, with particular reference to habitats listed in the Natural Environment and Rural Communities Act 2006 and defined in the UK Biodiversity Action Plan.
93	147	Chapter G - Policy G3	The area South of Coote Lane overlaps with Farington Lodges BHS and therefore the safeguarded land allocation should be amended to exclude the BHS, together with an appropriate buffer zone adjacent to it.  The land off Church Lane lies adjacent to Farington Lodges BHS and therefore the safeguarded land allocation should be amended to exclude an appropriate buffer zone adjacent to the BHS.  The Land off Emnie Lane overlaps with an area of Green Infrastructure. It is recommended that the safeguarded land allocation should be amended to exclude the Green Infrastructure and an appropriate buffer zone adjacent to it.
93	148	Chapter G - Policy G4	It is recommended that the following criteria be added to the policy: d) It does not affect an important wildlife site / habitat / species.
93	149	Chapter G - Policy G6	Whilst the Trust supports this policy for this Park, it considers that there is a need to: (a) acknowledge the Local Nature Reserve, important habitats and species; (b) conserve and enhance biodiversity; (c) highlight opportunities to buffer and expand the features and create corridors / links to other sites.
93	150	Chapter G - Policy G7	It is good to see Green Infrastructure shown on the Proposals Map but the Trust is disappointed that the definition doesn't include biodiversity / nature conservation, which should be an important element of Green Infrastructure. There is no mention of an Ecological Network, although wildlife corridors are shown on the Proposals Map. The Trust believes there should be some clarification in this respect. It also notes that there is no wildlife / biodiversity policy anywhere in this document. It is assumed that the Council is relying on the Core Strategy policies (which are very broad and generic). The Trust believes that there should be more detail included in this document.
93	151	Chapter G - Policy G8	The Trust believes that this policy should be more positive in terms of nature conservation and biodiversity. It is also concerned that the Council's definition of Green Infrastructure does not include biodiversity. There is also no reference to enhancement of biodiversity (a requirement of the National Planning Policy Framework) or the need for ecological networks / links to areas outside the site. Whilst Policy G12 does protect existing 'Green Corridors' and require new development to provide new Green Corridors this is not set in the context of biodiversity or ecological networks. The Trust recommends that the following criteria be added to the policy: e) protection, conservation and enhancement of the biodiversity of the site and its surroundings and contribute to the ecological network (or network of green corridors) in the area, and provide links to important habitats outside the site. As stated previously the Trust has serious concerns that this DPD has no wildlife / biodiversity specific policies, relying presumably on the Core Strategy policies, which the Trust does not consider to be sufficient.
93	152	Chapter G - Policy G9	Whilst the Trust supports this policy it considers that wording should: • acknowledge the BHS, important habitats and species; • acknowledge the need to conserve and enhance biodiversity; and • highlight opportunities to buffer and expand the features and create corridors / links to other sites.
93	153	Chapter G - Policy G10	The definition of Green Infrastructure doesn't include natural and semi natural greenspace for which a space standard has been allocated. The Trust would prefer to see the use of the Government's Accessible Natural Greenspace Standards (ANGSt).
93	154	Chapter G - Policy G12	The Trust believes that the wording of this Policy could be stronger / more specific in terms of the benefits of green corridors to wildlife and biodiversity. On the Proposals Map Green Corridors are shown with a different notation to wildlife corridors. There don't seem to be any policies specific to wildlife corridors, their protection or enhancement. Is this an omission?



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			The Lawton Review (2010) was commissioned by the government and identified the need for 'Landscape Corridors', 'Linear Corridors' and 'Stepping Stone Corridors'. The Trust recommends that Policy G12 is amended so that it includes 'Landscape Corridors', 'Linear Corridors' and 'Stepping Stone Corridors' in accordance with the Lawton Review and the requirements of the NPPF.
93	155	Chapter G - Policy G13	The Trust believes that this policy would be better aimed at ecology / biodiversity / habitats generally, instead of just trees and woodlands. If not then a separate policy is recommended. An ecological survey should be sought, not just a tree survey, together with the management methods to protect all retained / newly created / enhanced habitats.  Should the wording of (a)(iii) be "In a Conservation Area; or" (as opposed to "and")?
93	156	Chapter G - Policy G14	The Trust does not feel that the wording in (c) is sufficient to ensure that regard is had to the ecological value of an unstable or contaminated site.
93	157	Chapter G - Policy G15	The policy should recognise that a derelict site could be valuable ecologically. An additional criteria is recommended as follows: c) protect, conserve and enhance the biodiversity of the area.
93	158	Chapter H - Policy H1	The Introduction to Chapter H mentions the environmental as well as health benefits of allotments but the above policy doesn't mention them. Perhaps allotments should be included in those examples referred to in brackets?
93	159	General	There is no reference to cooperation with adjoining authorities on any environmental issues, as required by the NPPF. There is clearly a need for the ecological network in South Ribble to join up with those of adjoining authorities.  There is no reference to the UK Marine Policy Statement and marine plans and the requirement in Policy 105 of the NPPF to apply Integrated Coastal Zone Management across local authority and land/sea boundaries. Policy 106 of the NPPF also requires Coastal Change Management Area to be identified for any area likely to be affected by physical changes to the coast. Furthermore, there is no reference to Shoreline Management Plans as required by Policy 168 of the NPPF.  I have assessed the Site Allocations DPD against the environmental requirements of the NPPF using a traffic light system, which I have attached for your information.
94	160	Chapter B - Policy B5	We act for the owner's of the land edged in red on the attached plan (Ref: SAA/2089/01).  We would support this policy as there is a clear benefit in developing the remaining land within the area defined as the Capitol Centre in order to maximise the benefits to the local area.  The policy allows for a range of uses which would complement the current uses on the site.  We would strongly support this policy being taken forward in the Site Allocations and Development Management Policies Development Plan Document.
95	161	Chapter C - Policy C4 - Cuerden Strategic Site	Sainsbury's supports the allocation of Cuerden Strategic Site as an employment-led site where a range of high quality employment uses will be promoted. This allocation is considered to be sound as it reflects the existing uses within the site and is consistent with national planning policy contained within the National Planning Policy Framework (NPPF). (Please refer to accompanying letter for further information).
95	162	Chapter E - Policy E4	Sainsbury's supports the retention of Liverpool Road, Penwortham as a District Centre. However, the District Centre boundary and Primary Retail Frontages as currently proposed in the Site Allocations DPD excludes the site of the proposed Sainsbury's foodstore. This approach is considered to be inconsistent with national guidance and, therefore, unsound. It is recommended that the District Centre boundary and Primary Retail Frontage is extended to include the frontage of the proposed Sainsbury's store on Liverpool Road. (Please refer to accompanying letter for further information).  Further Information:  Delivering Economic Prosperity Policy E4 (District Centres)  Sainsbury's supports the retention of Liverpool Road, Penwortham as a District Centre under Policy E4. Penwortham is a healthy and vibrant centre offering a range of shops and services for the town and wider catchment.  As the Council is aware, a planning application for the redevelopment of the former Department for Work and Pensions buildings at the junction of Liverpool Road and Cop Lane for a new Sainsbury's foodstore was submitted in May 2011 (LPA ref: 07/2011/0380/FUL). The application received a resolution to grant permission at Committee on 22 May 2012, subject to amended conditions and the completion of a S106 Agreement. Sainsbury's legal advisors are currently in discussions with the Council to finalise the S106 Agreement which will allow the formal decision notice to be issued. The Sainsbury's store will strengthen the role and function of the District Centre.  The District Centre boundary and Primary Retail Frontages for Penwortham as currently proposed in the Site Allocations DPD excludes the site of the proposed Sainsbury's foodstore. This approach is considered to be inconsistent with national guidance and, therefore, unsound.  Paragraph 23 of the NPPF requires local planning authorities (LPAs) to define a network and hierarchy of centres that is resilient to anticipated future economic changes, and to undertake an



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>assessment of the need to expand centres to ensure a sufficient supply of sites to meet identified needs for retail, leisure, office and other main town centre uses. The new Sainsbury's store will create a natural extension to the District Centre by creating linked trips and contributing towards the centre's vitality and viability. The scheme has been designed to respond to the site's location and will be easily accessible by pedestrians within Penwortham District Centre.</p> <p>In light of the Council's resolution to grant permission for the new Sainsbury's store and of national policy set out in the NPPF, it is recommended that the Primary Retail Frontage and District Centre boundary of Penwortham should now be extended to include the frontage of the proposed Sainsbury's store on Liverpool Road.</p> <p>Suggested Change:  <ul style="list-style-type: none"> <li>Extend the District Centre boundary and Primary Retail Frontage of Penwortham to include the frontage of the proposed Sainsbury's store on Liverpool Road.</li> </ul> </p>
95	163	Policies B3, B4, C1, C2, C3, C5, D1, E1, E2	<p>Sainsbury's supports the Council's approach to allocate a number of sites and locations which will help to meet the Borough's identified future requirements for housing and employment land throughout the plan period. However, to ensure that these policies are consistent with the NPPF and, therefore sound, it is recommended that they are expanded to make allowance for the development of ancillary uses which could contribute towards creating sustainable development. The policies should also incorporate an element of flexibility to ensure that development can be brought forward in a timely manner. (Please refer to accompanying letter for further information).</p>
95	226	General	<p>Sainsbury's consider that the Publication version of the Site Allocations and Development Management Policies DPD is sound, subject to minor changes being incorporated within the document. These suggested changes are detailed in bullet points below the relevant policies.</p>
95	227	Chapter C - Policy C4 - Cuerden Strategic Site	<p>Sainsbury's supports the allocation of Cuerden Strategic Site as an employment-led site where a range of high quality employment uses will be promoted, including commercial, industrial, retail and leisure uses. This allocation is considered to be sound as it reflects the existing uses within the site, which include the existing Sainsbury's store, an Aldi foodstore, South Ribble Tennis Centre and trade counters.</p> <p>The range of uses considered to be suitable on the site is also supported. The Council's approach to 'employment uses' is not restricted to traditional B-Class Uses and, therefore, is consistent with national planning policy contained within the National Planning Policy Framework (NPPF). Paragraph 157 of the NPPF requires Local Plans to "allocate sites to promote development and flexible use of land".</p> <p>The proposed allocation is considered to be justified as it is based on adequate evidence. The Central Lancashire Employment Land Review (ELR) which was produced by Drivers Jonas for the Council in April 2009, considers the Cuerden Way site (ref: EMP4/4) to be 'mixed use' and recommends that consideration be given to the potential for further mixed use development in the area, including an appropriate element of employment floorspace, on the remaining part of the site. The proposed employment-led allocation clearly reflects this evidence.</p> <p>Suggested Change:  <ul style="list-style-type: none"> <li>None. Sainsbury's considers this policy to be sound.</li> </ul> </p>
95	228	Housing and Employment Allocations	<p>Sainsbury's supports the Council's approach to allocate a number of sites and locations which will help to meet the Borough's identified future requirements for housing and employment land throughout the plan period. This approach is consistent with national policy in the NPPF which states that "local plans should plan positively for the development and infrastructure required in the area" (paragraph 157).  Relevant policies include:</p> <ul style="list-style-type: none"> <li>Policy B3 (Commercial and Employment Site at South Rings Business Park, Bamber Bridge)</li> <li>Policy B4 (Commercial and Employment Site at Cuerden Way, Bamber Bridge)</li> <li>Policy C1 (Pickering's Farm, Penwortham)</li> <li>Policy C2 (Moss Side Test Track, Leyland)</li> <li>Policy C3 (Land between Heatherleigh and Moss Lane, Farington)</li> <li>Policy C5 (BAE Systems, Samlesbury)</li> <li>Policy D1 (Allocation of Housing Land)</li> <li>Policy E1 (Allocation of Employment Land)</li> <li>Policy E2 (Protection of Employment Areas and Sites)</li> </ul> <p>However, Sainsbury's considers that these policies should be expanded to make allowance for the development of ancillary uses (including small-scale retail) on these sites, which could contribute towards creating sustainable development.</p> <p>As advocated in Paragraph 17 of the NPPF, mixed use developments can bring significant benefits in creating sustainable communities, particularly in greenfield locations. Retail developments in particular can make a contribution towards creating sustainable communities by providing for local top-up needs within easy access of residential areas and, importantly, delivering economic growth by providing job opportunities within the local area. Furthermore, retail uses are often less sensitive than residential development in terms of amenity and can, therefore, act as a buffer between traditional employment uses and residential areas.</p> <p>In addition, all policies should incorporate an element of flexibility to ensure that the required development can be brought forward in a timely manner. This approach would make the policies</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>more compliant with the NPPF which makes clear that “local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change” (Paragraph 14).</p> <p>Suggested Change:</p> <ul style="list-style-type: none"> <li>• Expand relevant policies to include wording that makes clear that it may be appropriate for alternative uses to be provided in sustainable locations that are well placed to serve the community’s everyday needs.</li> <li>• Include an element of flexibility within the wording of the policies listed above to allow alternative uses to be brought forward within strategic locations, if considered necessary to enable development and achieve wider objectives.</li> </ul>
96	599	Chapter D - Policy D1 - Site N	<p>I wish to maintain my objection to the previous draft document, copy attached as appendix 1. I cannot accept the borough council’s rebuttal. In particular I consider that there is a significant flaw in your reliance on the wording “unless there are exceptional reasons for larger scale redevelopment schemes” in Policy 1 of the Core Strategy document. The Core Strategy informs the Site Allocations. Any exceptional circumstances should have been identified in the preparation of the later document. The wording in para 3.6 of the Site Allocations does not include any reference to exceptional circumstances in smaller villages, so clearly the process had already taken that into account. Policy D1-N does not provide any justification of any exceptional circumstances. It merely says that some limited new development is needed. It is worth pointing out that 45 houses would probably represent an increase in excess of 5% of the houses in the central part of the village. An open market development would not address any local need and would not be sustainable in that it would add to the numbers of people already commuting by car. It remains my contention that policy D1-N is in conflict with the vision of the document set out in 3.6 and should be removed. It should be noted that para 3.6 accords with the Hutton Village Plan. Policy D1-N is in conflict with the Village Plan.</p> <p>I accept that matters of detail need to be looked at if and when development is applied for. However, I consider that due regard has not been given to identifying site constraints. As an example, para 3.7 identifies drainage and flooding issues in Longton and requires developer contribution. There are similar problems in Hutton associated with this site. Local people take no comfort in the fact that LCC as Highway Authority will need to agree highway detail, particularly since LCC are also the landowners.</p>
97	164	Chapter C - Policy C3 - Site W	<p>I wish to object very strongly to the proposed development of 650 dwellings on land off Croston Road. Croston Road already has traffic calming measures on it because of the speed of traffic and this proposed development would increase the traffic flow by at least 1000 cars in the morning and the same in the evening.</p> <p>Croston Road residents already have to put up with the smells from the Global Renewables Site which Lancashire County Council said would not smell and cause us problems. THEY WERE WRONG.</p> <p>We moved to Farington Moss because of the green fields and country feel of the area. This development will turn out to be another Buckshaw Village where there are still many houses left to sell.</p> <p>As this country is in such dire straits where will people get the money from to buy these houses. Maybe they could buy one of the many houses that have been put up for sale on Croston Road since the announcement of this development.</p> <p>Is Leyland suddenly to become a boomtown for employment , I think not.</p> <p>Living in a bungalow next to the proposed entrance to the estate would result in unnecessary noise extra traffic and pollution.</p> <p>I have heard that land has already been purchased by a major house builder who has already been measuring Moss Lane for access to his estate.</p> <p>Why would a land owner be told that if he did not sell his land would become land locked by the other developers.</p> <p>It is as though the decisions have already been made and letters of objection by local residents mean nothing!!! What is this country coming to!!</p> <p>I strongly object to losing our green fields for a concrete jungle.</p>
98	165	NPPF	Please see identical representation Ref No: 86, ID109
98	166	Rural Local Service Centre	Please see identical representation Ref No: 86, ID 110
98	167	Chapter C - Policy C5 – BAE Systems, Samlesbury	Please see identical representation Ref No: 86, ID 111
98	168	Chapter E - Policy E5	Please see identical representation Ref No: 86, ID 112
98	169	Energy Efficiency of New Developments	Please see identical representation Ref No: 86, ID 113
98	170	Chapter D - Policy D1 - Sites M, V & X	Please see identical representation Ref No: 86, ID 115
98	171	Chapter D - Policy D1 - Site Q	Please see identical representation Ref No: 86, ID 116
99	172	NPPF	Please see identical representation Ref No: 86, ID 109
99	173	Rural Local Service Centre	Please see identical representation Ref No: 86, ID 110

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
99	174	Chapter C - Policy C5 – BAE Systems, Samlesbury	Please see identical representation Ref No: 86, ID 111
99	175	Chapter E - Policy E5	Please see identical representation Ref No: 86, ID 112
99	176	Energy Efficiency of New Developments	Please see identical representation Ref No: 86, ID 113
99	177	Chapter D - Policy D1 - Sites M, V & X	Please see identical representation Ref No: 86, ID 115
99	178	Chapter D - Policy D1 - Site Q	Please see identical representation Ref No: 86, ID 116
100	180	NPPF	Please see identical representation Ref No: 86, ID109
100	181	Rural Local Service Centre	Longton is described as a rural local service centre; however it is in fact a village. I note that the adjective rural is used. The document states that Longton is well placed for future employment and housing needs, but Longton has already been over-developed by housing stock and does not have the capacity at present nor in the future to cope with the increase in traffic volume that this would entail. The pressure to build new housing stock in Longton and other rural/semi-rural areas is attempting to make some kind of housing shortfall for the lack of development on Brownfield sites in the Borough.
100	182	Chapter C - Policy C5 – BAE Systems, Samlesbury	Please see identical representation Ref No: 86, ID111
100	183	Chapter E - Policy E5	Please see identical representation Ref No: 86, ID112.
100	184	Energy Efficiency of New Developments	Energy Efficiency of New Developments – page 84. Lancashire County Council may have a statutory right to install street lighting in new developments, but there is no legal requirement (statutory obligation) for street lighting, therefore planning permission must be sought by property developers to install street lighting if the road in the development reaches adoptable standards. Unnecessary lighting contributes to global warming and causes light pollution. The requirements of the Wildlife & Countryside Act must be considered in relation to protected species & street lighting. Street lighting for new developments should not be provided out of council tax funding
100	185	Chapter D - Policy D1 - Sites M, V & X	M, V & X: South of Longton, Hall, Land adjacent to Longton Hall & Land off School Lane, Longton – page 37. Longton already is viable as a thriving village and needs no further development to support & maintain the services that it provides. It certainly does not have the capacity to support the increase of volume in traffic that any further development would entail. These Greenfield sites ought to be used for agricultural purposes so that people can grow produce for local consumption. Brownfield sites must be used for housing development first.
100	186	Chapter D - Policy D1 - Site Q	Please see identical representation Ref No: 86, ID116
101	187	Chapter C - Policy C3 - Site W	Leland is already overcrowded and over populated with motor vehicles, many of which frequently use Croston Road as a rat run to avoid frequent severe congestion on the by-pass.  There are insufficient school places to accommodate the potential influx of children the proposed developments could bring. There is currently nothing for families to do at week-ends; no places to go, no entertainment facilities. And no proposals to create any!  Planners should consider long and hard the abortion that is the Morrison’s retail park. Its access is dire and its exit, worse. No sane person could fail to see the congestion this abomination creates. But you did!  Leyland already has too many homes and not enough of everything else that the people who live in those homes, need.  My own property includes three stables and two paddocks. The outlined properties around my own come far too close to the paddocks and in doing so propose a serious risk to the safety of riders in the paddocks if and when noise, etc., spook a horse.  In recent times property values throughout the country have been dramatically reduced. The proposals, which destroy our outlook, will further diminish the values. Consideration must be given to the impact on individuals like me and not purely the wider gains to the town which will probably create many more problems than they solve.
102	188	Chapter C - Policy C3 - Site W	Objections: Increase road traffic and pedestrians, compromising road safety Change to the character of the area, loss of wildlife and landscape Increased noise and air pollution Loss of value to the properties as our houses are unique with open land to the rear which is a great selling feature and which would be lost. Negative effect on the character of the neighbourhood which is currently semi-rural.
103	189	Chapter C - Policy C3 - Site W	Please see identical representation Ref 102, ID 188.

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
104	190	Chapter C - Policy C3 - Site W	Please see identical representation Ref 102, ID 188.
105	191	Chapter C - Policy C3 - Site W	<p>I object to the proposed residential development for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Destruction of semi-rural aspect to rear of our property (which we have enjoyed for over 13 years), being one of the key reasons why we purchased the property.</li> <li>2. Likely depreciation of our property value due to destruction of semi-rural location with open outlook to rear of property.</li> <li>3. Destruction of wildlife habitat and associated wildlife corridors – especially the large hawthorn hedgerow along the rear garden boundary of properties along southern side of Bannister Lane.</li> <li>4. The proposed development will remove moss habitat, wildlife and increase air and noise pollution. Has a detailed environmental impact assessment been performed and, if so where is this for inspection and comment by residents? The suggested addition of 18 houses to Bannister Lane (and likely through traffic from planned development via an easily removed plastic emergency barrier?) will increase vehicular traffic along what is a narrow lane hence increasing risk of traffic accidents, air and noise pollution. This will effectively destroy the existing quiet semi-rural cul-de-sac character of Bannister Lane.</li> <li>5. Any attempt to widen Bannister Lane as part of any ‘improvement’ would destroy the existing character of the land.</li> <li>6. The suggested social housing, eg ‘new village street’ – incorporating mews/apartment type properties appears to be immediately to the rear of our property and is completely out of character with the traditional 1930s ribbon development, with loss of privacy where overlooked; and</li> <li>7. The inclusion of social housing is incompatible with the area and will have a negative impact on the socio-economic structure of the neighbourhood and may give rise to increased local crime.</li> </ol>
106	192	Chapter C - Policy C3 - Site W	Please see identical representation Ref No: 105, ID191
107	194	Chapter C - Policy C3 - Site W	Please see identical representation Ref No: 105, ID191
108	195	Stages of Production	<p>Our first objection is on the public consultation and how we feel this has been poorly communicated to residents, who its proposals will have a direct and significant impact. As residents of Bannister Lane who will be directly impacted upon from one of the three proposed major development areas, as adjoining landowners, we have not received any direct communication from the council of these proposals. The first we, and other neighbours, became aware of the proposals (which are now in the final stages of production according to Figure 1 ‘Development Plan Document Stages’) was from local residents carrying out leaflet drops to try and raise awareness, who by chance had noticed it on the councils website when searching for something unrelated.</p> <p>As residents of Bannister Lane since 2008, we have not received any communication prior to this document, and certainly were not invited / involved in the ‘eight week public consultation exercise’ which is claimed to have taken place according to section 2.6. Again this would appear to have been insufficient in comparison to the scale of changes proposed. And the response from the council representative (Zoe Harding) at Booths supermarket in Longton on Tuesday 10th July regarding this issue is considered unacceptable, whereby Zoe stated that it would be “...too expensive to write and consult with neighbouring residents”.</p>
108	196	Vision - Locating Growth - Section 3.4	Our second observation is more of a consistency issue. In section 3.4 it sets out the ‘Major Sites for Development’ which excludes Land Between Heatherleigh and Moss Lane, Farington (which in itself is also an error as part of Heatherleigh and all of Moss Lane fall within the parish of ‘Farington Moss’ not ‘Farington’, which is a separate parish) which is later referred to as one of the three major residential sites for development
108	197	Chapter C - Policies C2 and C3	Our third objection is about the choice of suitable sites for major residential development. In a borough of 11,461 hectares it is irresponsible to consider proposing two of the three major residential developments Policy C2 and C3 (a combined total of 1350 houses) within 1km of each other. Regardless of any proposed phasing, the eventual consequence is going to be an extra 1350 houses within an already heavily populated area, and all probably bringing with them an average of 2 cars per household pouring onto the already congested Flensburg Way, and associated minor roads at peak times. Therefore it is anticipated that not only will we and other local residents have to contend with mini ‘Buckshaw Village’ developments on our doorstep, but the associated changes that the County Council will have to make in order for our local road network to cope with the increased volume in traffic. In summary we feel that the distribution of major new residential development has not been fairly distributed across the borough.
108	198	Chapter C - Policy C3 - Site W	<p>Our fourth objection specifically relates to Policy C3 and information contained in paragraphs 6.23-6.25. The area this policy relates to is identified as ‘W’ on the proposals map. This proposal would have a significant and detrimental impact on the residents of Moss Lane, Croston Road, Bannister Lane and Heatherleigh Way. It is also proposing to have an impact and loss on local businesses, namely loss of farmed agricultural land by J Bennett at Model Farm, Croston Road, Farington Moss and loss of glass houses and associated buildings necessary to AW Noblett horticultural nursery supply business.</p> <p>When purchasing the properties along Bannister Lane, the residents (some of 20+years) purchased the houses for the quiet, semi-rural and no-through road position. These proposals would entomb Bannister Lane on both sides into a glorified housing estate. And as a consequence there will undoubtedly be a negative impact on the value of our properties; putting a further squeeze onto everyone’s already stretched financial situation as a result of the current recession. It is also anticipated that by proposing a change in land use many of the properties along Bannister Lane will become overlooked, especially if apartments and mews style housing is proposed as these typically have three floors with the middle floor being the main, elevated, living accommodation.</p> <p>It is also difficult to see how the proposals would be able to retain the green corridors already in situ, providing valuable wildlife habitat and foraging routes for birds and bats; as these would have to be dissected at some point in order to install an estate road. The retention of green corridors is a further recommendation within the document (Policy G10, 12 and 13) and in proposing development within area ‘W’ it is virtually condemning these existing site features, and therefore the document contradicts itself.</p> <p>If there can be any positive of Policy C3 it is the statement that ‘there is to be no access to the site from Bannister Lane.’ This is all well and good but needs to be upheld, should this policy be</p>

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			<p>passed, as LeaHough Chartered Surveyors are already proposing to submit an outline planning application for land between Heatherleigh and Bannister Lane, with which they propose to have a 'small area of development served off Bannister Lane with upgraded road and turning facility.' This clearly goes against the proposed Council policy, and therefore should not be approved, if submitted. This in itself all appears to be being dealt with underhand; as LeaHough's claim to have been asked by the council to push this element of the development forward, and their timeframes would mean outline planning could be granted for the area between Heatherleigh and Bannister Lane as early as December, which is before the council plan to adopt this document.</p> <p>Consequently, I would object to the proposed housing on site 'W', but instead favour, if there needed to be a major residential development within the Farington Moss general area, the proposals at site 'FF' as defined in Policy C2. The reasons being, that this area is not already surrounded by residential properties, therefore it would not adversely impact on residents well being and livelihood; and it is an area that is currently derelict and would have a better use of land than the loss of agricultural and horticultural land.</p>
109	199	Chapter C - Policy C3 - Site W	<p>I attended the Public Consultation event yesterday – many local residents are appalled at this proposed building layout. My main concern living on Bannister Lane is extra traffic on the Lane – which can only just cope with the amount there is already. In addition, Croston Road cannot, in my opinion, take any more traffic. I am also concerned at the devaluation of my property which currently is classed as semi rural – this will no longer be the case if the building goes ahead. No monetary recompense will be made to any residents in the area – so we will all lose out financially.</p> <p>In addition, Lea Hough state that some of the building will be for 'affordable housing' – I take this to mean 'council tenants' – which if I am honest, I do not want living in the direct vicinity of my property.</p> <p>Local schools, doctors and dentists do not have capacity to take on this level of new patients as they are currently full – with 300 properties minimum, the number of extra patients/schoolchildren will increase considerably.</p> <p>I am also appalled that the consultation event was held yesterday following a leaflet through my door last week – and the closing date for yourselves is today. This does not give anyone time to digest or respond in a reasonable timeframe.</p> <p>I would urge you to consider the refusal of planning permission to the Lea Hough group.</p>
110	200	Chapter C - Policy C3 - Site W	<p>The proposal in relation to this area cannot be supported in its current form due to the stipulation that access to the site must be via Croston Road. For the size of this development 1000+ properties Croston Road is simply not a suitable main access point even if access is spread across three locations along Croston Road. Even with the S106 and CIL contributions it is not practical to expect any infrastructure improvements to alter the character of Croston Road sufficiently to support such an increase in the volume of traffic that such a development would inevitable generate.</p>
111	201	General	<p>As you know, HOW Planning (HOW) has been instructed by Taylor Wimpey UK Ltd (TWUK) to prepare and submit representations to the above Consultation Paper. The representations are made in relation to Pickerings Farm, Penwortham and enclosed is a completed Representation Form.</p> <p>HOW on behalf of Taylor Wimpey have also made representations to the earlier versions of the Site Allocations and Development Management Policies DPD namely the Issues and Options Consultation Paper (September 2010) and the Preferred Options Consultation Paper (December 2011). The representations set out in this letter should be read in conjunction with HOW's representations on behalf of TWUK in relation to the earlier versions of the draft DPD.</p> <p>The representations below relate solely to the draft allocations and policies contained in the Consultation Paper. Where necessary, the representations propose changes to the draft Policies. It is requested that the representations are fully considered by South Ribble Borough Council (SRBC) in the preparation of the emerging Site Allocations and Development Management Policies DPD and other emerging Local Development Framework (LDF) documents.</p>
111	202	Overview	<p>In accordance with the draft Proposals Map, the Consultation Paper partially allocates the Pickerings Farm site for residential led development. The allocation extends to around 79 hectares and includes the potential extension to the Cross Borough link road which runs east to west through the draft Housing Allocation.</p> <p>The overall Pickerings Farm site extends to circa 90 hectares and the remaining land to the south of the draft Housing Allocation is designated as safeguarded land. The key draft policies which relate to the site's Housing Allocation include;</p> <ul style="list-style-type: none"> <li>☐ Draft Policy A1 – Cross Borough Link Road;</li> <li>☐ Draft Policy C1 – Pickerings Farm, Penwortham;</li> <li>☐ Draft Policy D1 – Allocation of Housing Sites; and</li> <li>☐ Draft Policy D2 – Phasing, Delivery and Monitoring.</li> </ul> <p>Central Lancashire Core Strategy</p> <p>The three Central Lancashire Authorities, Preston, South Ribble and Chorley have now adopted the Central Lancashire Core Strategy. The adoption dates being Preston (5 July 2012); Chorley (17 July 2012); and South Ribble (18 July 2012).</p>



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			<p>In accordance with the recommendations of the Core Strategy Examination Inspector, Mr Richard Hollox, the two main modifications suggested to enable the Authorities to adopt the plan have been incorporated into the final document. These modifications included:</p> <p>☑ Main modification 1 – the adoption of RSS Annual Average Housing Requirements, being 507, 417 and 417 for Preston City, and Chorley and South Ribble Boroughs respectively. The identification of additional Strategic Sites and Locations including the Land South of Penwortham and North of Farington Strategic Location which takes in the Pickerings Farm site; and</p> <p>☑ Main modification 2 – a policy concerning the presumption in favour of sustainable development.</p> <p>Emerging Pickerings Farm Residential-Led Allocation</p> <p>SRBC has increased the extent of the draft Residential Led Allocation at Pickerings Farm in the Publication Version Consultation Paper. In the Preferred Options Consultation Paper, it first identified where development will be provided at the South of Penwortham and North of Farington Strategic Location. It proposed to allocate part of the Pickerings Farm site for residential led development with a yield of 1,200 dwellings. The Publication Version Consultation Paper has increased the extent of the proposed allocation from 65 hectares to around 79 hectares with an estimated yield of 1,350 houses.</p> <p>In principle, TWUK welcome and support the proposed Housing Allocation. The draft Development Statement submitted to the Council in March 2011 demonstrates the suitability of the site for large scale residential led development. Pickerings Farm is the most appropriate and deliverable option for housing in the South of Penwortham and North of Farington Strategic Location.</p> <p>TWUK do have some detailed objections to the draft Policies and supporting text contained in the Publication Version Consultation Paper. TWUK would like to continue to work closely with Officers and statutory consultees to promote the site through the emerging LDF and the following sections set out TWUK’s concerns.</p>
111	203	Chapter C - Policy C1 - Pickering's Farm	<p>Draft Policy C1 relates to Pickerings Farm, Penwortham and states:</p> <p>“Planning permission will only be granted for the development of the Pickerings Farm site subject to the submission of:</p> <p>a) An agreed Masterplan for the comprehensive development of the site. The Masterplan must include the wider area of the Pickerings Farm site which includes the safeguarded land to Coote Lane as shown on the Proposals Map, and make provision for a range of land uses to include residential, employment and commercial uses, green infrastructure and community facilities;</p> <p>b) A Phasing and Infrastructure Delivery Schedule;</p> <p>c) An agreed programme of implementation in accordance with the Masterplan and agreed Design Code.”</p> <p>TWUK make the following representations in relation to the proposed wording of draft Policy C1 and supporting text at paragraphs 6.6 to 6.12:</p> <p>1. Agreed Masterplan – as discussed recently, a masterplan for the entire Pickerings Farm site (extending to 90 hectares) will be prepared and submitted to SRBC for approval prior to the submission of an outline planning application.</p> <p>The Consultation Paper relates strongly to a comprehensive development which TWUK support in principle. However, the size of the sites partial allocation covers 79 hectares of the available 90 hectares and therefore the range of uses and infrastructure that can be delivered will need to be phased and also brought forwards in accordance with need and viability testing.</p> <p>The range of uses are broadly consistent with the mix of uses described in TWUK’s draft Development Statement. Whilst the range of uses are supported in principle, the draft Development Statement was based on a larger site area which would have delivered 2,000 new houses.</p> <p>As the housing allocation relates to a smaller area with an estimated lower housing yield (1,350 houses) TWUK request flexibility to be introduced in to draft Policy C1 to enable the range of uses to be delivered in accordance with demand and viability. Employment generating uses and commercial uses in the form of a local centre with a convenience store of neighbourhood scale can be provided and TWUK request retail to be added to the list of uses referenced in draft Policy C1 (a).</p> <p>Given the extent of allocated Employment Sites in the area (such as the Cuerden Strategic Site); there are clearly more appropriate locations to accommodate “B” Use Class employment development. Given the reduced site area, it would be more appropriate for “B” Use Class employment to be provided on alternative sites within the locality. TWUK therefore object to employment being referenced in the range of uses in draft Policy C1(a) and request that it is omitted in the next version of the document.</p> <p>new primary school and a medical centre however these uses would be subject to need and viability testing. It may be possible to fund the delivery of these uses in the later phases of the project through the delivery of residential development in earlier phases.</p> <p>Of particular concern to TWUK is the requirement for the land allocated for residential led development to solely fund and deliver all necessary infrastructure. At an appropriate time, the designated safeguarded land to the south could be brought forward for development and TWUK require a mechanism which requires development on this land to contribute to the infrastructure requirements of the DPD. Furthermore, TWUK require other sites in the area to contribute to the infrastructure delivered as these schemes will also significantly benefit.</p> <p>2. Phasing and Infrastructure Delivery Schedule – TWUK in principle accepts the requirement for a Phasing and Infrastructure Schedule. However, the Consultation Paper sets out conflicting requirements with some sections (e.g. chapter D, paragraph 7.71) requiring the larger greenfield sites to deliver significant infrastructure before the construction of any housing. TWUK would like to work closely with SRBC Members and Officers to agree phasing and infrastructure delivery. TWUK strongly object to any requirements in the Consultation Paper for infrastructure to be</p>

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			<p>delivered up front on greenfield sites such as Pickerings Farm due to the significant cost to the construction of infrastructure and the purchase of land prior to any incoming monies from house sales. TWUK require flexibility to be maintained throughout the entire draft DPD for infrastructure to be delivered in a timely manner having regard to viability and demand.</p> <p>The recently published National Planning Policy Framework (NPPF) seeks to ensure viability and deliverability of emerging Local Plans and the DPD should be prepared having regard to this guidance. Paragraph 173 of the NPPF requires Local Authorities to prepare deliverable plans and states:  “Pursuing sustainable development requires careful attention to viability and costs in plan making and decision taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the cost of any requirement likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable.”</p>
111	204	Chapter D - Policy D1	<p>Draft Policy D1 allocates sites for housing and states:</p> <p>“The sites listed below (and as shown on the Proposals Map) are allocated for residential development (and related infrastructure which is to be delivered through CIL and/or developer contributions.  The allocated housing land equates to a total of 4,108 dwellings over the plan period.”</p> <p>Table 1 in draft Policy D1 sets out each of the new housing allocation sites identifying the site area and estimated number of dwellings to be developed. The relevant extract for Pickerings Farm is below.</p> <p>Table 1 Extract – Pickerings Farm Housing Allocation</p> <p>In principle, TWUK support the partial allocation of the Pickerings Farm site for housing although the concerns raised in HOW’s representations on behalf of TWUK to the Preferred Options Consultation Paper in relation to how SRBC will meet its future housing targets remain.  The housing targets for the plan period are set as a minimum and SRBC will have failed to deliver sufficient housing if the target is not met. Furthermore, the NPPF requires Local Planning Authorities to plan for sufficient housing against their housing requirements with an additional buffer of 5% or 20% (where there has been a record of persistent under delivery), to ensure choice and competition in the market for land.  Paragraph 7.3 of the Consultation Paper states:</p> <p>“Policy 4 of the Central Lancashire Core Strategy sets out the number of new houses required in the Borough in line with figures contained in the Regional Spatial Strategy, which equates to 417 dwellings per year from 2010 – 2026, this is a total of 6,255 dwellings for the 15 year period. Since 2010 there has been low build rates in the Borough which has therefore resulted in a shortfall of 560 units, which will be made up within the plan period.”</p> <p>There is some confusion over the Council’s housing target for the plan period. Whilst paragraph 7.3 refers to a 15 year plan period it also references the delivery of 417 dwellings per year from 2010 to 2026 which is actually a 16 year plan period. On the basis of the latter, the Council actually has a total housing target of 7,232 houses (6,672 houses + 560 houses) between 2010 and 2026 (the plan period). Draft Policy D1 allocates housing land for 4,108 dwellings. To meet the remainder of the housing requirement, SRBC has used existing housing commitments including sites with planning permission for housing, sites with a current planning application, other sites which consist of small sites with permission (average of under 10 dwellings), other small sites that are accounted for in the SHLAA and large sites that are currently under construction. The Council’s housing position is set out in table 2 and the summary extract is below:</p> <p>Table 2 Extract: Totals (at June 2012)</p> <p>The total identified houses which will be provided over the plan period is 6,962 which is a shortfall when measured against the overall total minimum requirement of 7,232 new houses. This minimum housing target also does not include the additional buffer required by the NPPF. If the additional buffer was introduced to these figures, the Council’s shortfall in additional houses would be further exacerbated.</p> <p>Paragraph 7.13 of the Consultation Paper indicates that the Council would expect to see some windfall development. Based on previous windfall trend and on an assumption that each small sites that receives planning permission will be built, an indicative total of 45 windfall dwellings may be built annually over the plan period which will offer some flexibility to the housing supply.</p> <p>The NPPF at paragraph 48 indicates that Local Planning Authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and would continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. TWUK questioned whether sites with planning permission and future windfall sites are sufficiently deliverable for the Council to meet its overall housing target especially when the additional buffer required by the NPPF is introduced. In addition, concerns are raised over the number of units estimated for delivery at some of the sites listed in table 2. The Council has identified 475 houses to be delivered at Vernon Carcus and Land at Factory Lane, Penwortham (Proposals Map ref: H). However the Consultation Paper at paragraph 7.26 indicates the site is the subject of a current planning application for a mixed use development of 368 dwellings and 4,500 sq m of Class B1 commercial floor space. The housing land description for the site is therefore not consistent with table 2 and it appears as though 475 units will not be achieved at the site</p>

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			<p>especially as it only extends to 4.14 hectares.</p> <p>1,350 houses, the following objections are made:</p> <ol style="list-style-type: none"> <li>1. A shortfall of housing land has been identified to address the minimum housing requirement of 7,232 houses over the plan period;</li> <li>2. The Council are relying on windfall developments of 45 units per year to add flexibility and address any shortfall for housing. TWUK are concerned that the Council cannot demonstrate that the windfall development will deliverable; and</li> <li>3. The estimated yield of some of the land included within the Council's housing calculations is over estimated and the number of units to be achieved on these sites is not likely to be deliverable.</li> </ol> <p>TWUK's draft Development Statement demonstrates the suitability and deliverability of the Pickerings Farm site. Pickerings Farm is the most appropriate and deliverable option for future development in the South of Penwortham and North of Farington Strategic Location. TWUK request the Council considers its forward housing land position as there is an opportunity to make up any shortfall at Pickerings Farm in a highly sustainable and comprehensive manner.</p>
111	205	Chapter D - Policy D2	<p>Draft Policy D2 relates to phasing, delivery and monitoring. The policy indicates the sites will be released for development in the following three phases:</p> <p>Phase 1 – 2010-2016 Total = 2,712  Phase 2 – 2016-2021 Total = 2,469  Phase 3 – 2021-2026 Total = 1,902</p> <p>Phases 1, 2 and 3 are shown in Table 2 on page 34 of the Consultation Paper. Table 2 highlights a total of 6,962 units have been identified for development through the plan period. However, the total number of identified houses to be provided in each of the three phases equates to 7,232. TWUK have concerns with this approach and request the Council revise the yields identified for the three phases to ensure the level of development brought forward is consistent with the Council's overall housing target for the plan period. Furthermore, TWUK request the estimated targets for each phase are treated as a minimum.</p> <p>Paragraph 7.14 indicates there has been reduced housing delivery due to lower average build rates which can be made up over the plan period. As of March 2012, there is a shortfall of 560 units and having considered the phasing of housing delivery, the Council is of the view that there is potential for this to be made up in the first six years (Phase 1) of the plan (or over the full plan period if necessary).</p> <p>TWUK support the approach of providing a larger quantum of development in Phase 1 in order to address the Council's previous shortfall of housing delivery. Draft Policy D2 also introduces a control mechanism which states:</p> <p>"Annual monitoring of the delivery of housing will be undertaken. It will include a review of sites and phasing within Table 2 and aim to ensure that a five year supply (including a 20% buffer if appropriate, and if performance approves, the Council will look at the reducing the buffer to 5% as part of the monitoring process) of deliverable sites is maintained in line with the National Planning Policy 7 Framework. If sites allocated to particular phases do not deliver as predicted, sites may be brought forward from later phases and others put back.</p> <p>If the total number of dwellings permitted is above the total number of dwellings acceptable within a particular phase the Council will review the sites within the remaining phases and bring forward where appropriate.</p> <p>Once the planning permission has expired, there will be no presumption that it will be renewed unless a start has been made on construction. Any application for renewal of permission will be considered having regard to a demonstration of the deliverability of the scheme and the annual monitoring of housing site delivery."</p> <p>The justification to Policy D2 at paragraph 7.71 states:  "Wherever possible, the Council will seek to bring forward previously developed sites during the first six years. Due to the delivery issues with previously developed land, some greenfield land will need to be brought forward at a fairly early stage. The larger greenfield sites are also dependent on the delivery of significant infrastructure before the construction of any housing."</p> <p>As highlighted above, TWUK object to the requirement for the delivery of significant infrastructure before the construction of any housing. The delivery of infrastructure will result in significant costs and will need to be part funded through the monies generated from house sales as well as other funding mechanisms. The requirement for upfront infrastructure delivery will place impossible financial pressures solely on the developer. TWUK would like to work closely with both Members and Officers at SRBC to agree an appropriate phasing and infrastructure delivery schedule which allows the delivery of infrastructure to be cross funded through the delivery of development. To achieve this, TWUK require paragraph 7.71 to be revised accordingly.</p>
111	206	Chapter A - Policy A2 - Transport	<p>Draft Policy A2 relates to the Cross Borough link road and states:  "Land will be protected from physical development for the delivery of the Cross Borough link road. The Cross Borough link road comprises:</p> <ol style="list-style-type: none"> <li>a) A road to be constructed from Carrwood Road to The Cawsey, as shown on the Proposals Map.</li> <li>b) A road to be constructed through the major development site at Pickering's Farm as shown diagrammatically on the Proposals Map."</li> </ol> <p>TWUK recognise the Council's political aspiration for the delivery of the Cross Borough link road extension as part of the residential led development at Pickering's Farm and in principle, support this approach. However, concerns are raised to the manner of importance attached to the delivery of the link road throughout the Consultation Paper. Until the need and impact of the Cross Borough link road has been fully assessed, the weight attached to the importance of the link road cannot be described. LCC Local Transport Plan 3 states:</p>

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			<p>“In order to make more informed decisions about the location and scale of the proposed development around Preston, South Ribble and Chorley a Central Lancashire traffic model is being developed. This will enable the affect of proposed development on the road network to be better estimated and potential solutions investigated.”</p> <p>Once the Cross Borough link road has been modelled, using LCC’s new transport model, the need and impact for the road can be quantified. Paragraph 4.18 of the Consultation Paper states: “The link road will improve accessibility in an east-west direction through the Borough, increase community access to the range of services within the Borough and help traffic flow on existing roads.”</p> <p>At this stage, the benefits and impacts of the link road cannot be fully understood until the need and impact assessments have been undertaken. The emerging Site Allocation and Development Management Policies DPD should therefore be revised accordingly to have regard to the required highways modelling work.</p> <p>Work is also being carried out by SRBC along with Preston and Chorley Authorities in relation to CIL. TWUK consider CIL to be necessary to assist the delivery of infrastructure however there are several other funding streams which should be used to ensure the commercial viability of the development is not undermined. Financial contributions from other proposed developments and sites situated within the local area should also be secured by the Council to assist with the delivery of the infrastructure as part of the Pickering’s Farm development as these schemes and sites will benefit from this infrastructure. Appropriate reference to the requirement for other schemes and sites to contribute financially to the infrastructure delivery should be made in the next version of the DPD.</p> <p>In principle, TWUK support the requirement to deliver the required infrastructure, however flexibility should be introduced into the emerging Site Allocation’s and Development Management Policies DPD to allow infrastructure to be brought forward in line with demand and viability. Consideration is required for the level of site enabling works which have to take place on a site by site basis. There are enabling works relating to drainage and utilities at Pickering’s Farm which will require funding in addition to the Council’s CIL requirements. The Consultation Paper as currently drafted has no regard to site enabling works and costs which could bear a serious burden to a scheme’s viability.</p> <p>West Coast Mainline Bridge Paragraph 6.9 of the Consultation Paper indicates the Cross Borough link road is required which will link the A582 Penwortham Way with the B5254 Leyland Road and includes a new bridge crossing the West Coast mainline. TWUK are concerned with the level of importance attached to the requirement for the new West Coast Mainline Bridge, because until the relevant assessments and surveys are undertaken the need for it is unclear. The Pickering’s Farm development will provide the opportunity for the delivery of the bridge, however this infrastructure is not essential for the delivery of the development.</p>
112	207	Chapter C - Policy C3 - Site W	The proposal states that the proposed development of +1,000 homes will be accessed via Croston Road. This is not a suitable main access point. Croston Road is not capable of supporting the volume of traffic that a development of this size would attract, even if the access was split across three locations. Neither could any infrastructure improvements be sufficient to alter the character of Croston Road sufficiently enough to support such an inevitable increase traffic volume.
113	208	Chapter C - Policy C2 - Moss Side Test Track	<p>I am xxxxxx and I reside with my family at the above address on Longmeanygate Leyland. I have done for the past 25 years. I have lived in Leyland all my life and am well aware of local issues and developments. I am retired having served 30 years in the Lancashire Constabulary, a fact I refer to as I believe myself to be well qualified to make the representations I am about to commit to paper as I have had considerable experience of matters relating to Traffic Management and Road Safety. I was also a trained Health and Safety Assessor.</p> <p>SUMMARY</p> <p>Please see identical representation Ref: 129, ID 230.</p>
114	209	Chapter G - Policy G1 - Collingwood Farm	<p>Collingwood Farm is a former chicken farm which is now almost entirely used for storage and distribution purposes under class B8 of the Town and Country Planning [Use Classes] Order 1987 [as amended].</p> <p>The former chicken sheds are occupied by a variety of different local businesses who store goods and materials on site providing access at any time of the day or night. There is no control over who visits the site or how often and it is frequently the case that one or more businesses are accessing the site at the same time. This can lead to congestion both on and off the highway.</p> <p>The nature of the buildings is such that, although they have been well maintained and are in good condition, they are not attractive in appearance, indeed, the high density, utilitarian appearance contrasts markedly, with the attractive residential properties immediately adjoining the site.</p> <p>The whole of the site is concreted over with no landscape features other than around the periphery, with buildings running right up to the boundary, particularly on the north west corner. This provides a very hard interface with the open countryside beyond.</p> <p>When viewed from the open countryside area, the buildings and use of the site presents an unattractive view which visually conflicts with the more attractive and softer edge to this part of Hutton. It is acknowledged that the site lies within the Green Belt but there are a number of elements which indicate that a residential development at this time would be an acceptable use of the site.</p>

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			<p>First of all, the site lies immediately adjacent to the existing urban area of Hutton and visually relates to the built up area rather than the open countryside beyond. Indeed it appears as part of the settlement rather than open land and its development would only serve to consolidate this existing relationship.</p> <p>Secondly, the site is wholly brownfield/previously developed and contains a variety of high density existing buildings which are almost all in urban rather than agricultural uses. The site does serve any of the purposes of the Green Belt in its current use and its removal would not impact adversely on the maintenance of the Green Belt. The general appearance of the site would be improved significantly by the development of the site for residential purposes. The development of the site for a residential use would also improve the amenity enjoyed by the residents of the surrounding properties in terms of visual appearance, noise and general non residential activity.</p> <p>The site is also located in an extremely sustainable location within walking distance of a post office and convenience store. The site is also within 400m of a bus stop which provides regular services into Preston and the surrounding area. Therefore the development of residential development in this location would support the Government' objective to support sustainable development.</p> <p>Turning to the policy implications of the proposed development, it is accepted that the principle issue is the Green Belt. However, the National Planning Framework does allow the redevelopment of previously developed land within the Green Belt. The last bullet point of para. 89 of the NPPF states that appropriate development in the Green Belt includes: "limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development."</p> <p>The proposed redevelopment of Collinwood farm would constitute the complete redevelopment of a previously developed site. It could also be done in a manner which would not have a greater impact on the openness of the Green Belt or the purposes of including land within it by scaling the development to a similar amount of site area to the existing usage. Indeed, the impact upon the openness of the Green Belt could in fact be reduced as it would not be appropriate to site dwellings right up to the site boundary and therefore a softer more appropriate intersection with the open countryside could be created.</p> <p>There is nothing within bullet point 6 of para. 89 that says such uses have to be in the same use as the existing one to be acceptable and indeed, this argument is supported by the fact that in a previous bullet point [4], reference is specifically made to that form of development being appropriate if in a the same use.</p> <p>For this reason, it is considered that the proposed development would be appropriate development in the Green Belt as defined by the NPPF. However, there are also other considerations which would justify the use in the Green Belt. The site is located on a relatively narrow stretch of Ratten Lane where the existing traffic in and out of the site makes highway conditions less than ideal. Indeed, the development would provide the opportunity to widen and straighten the road in this location, this improving highway conditions. There may also be an opportunity to link the pedestrian footpath through to the existing residential area on Ratten Lane.</p> <p>The existing use also causes problems in terms of HGV movements and other noise and disturbance. The site owner has licences for the operation of several HGVs from the site and there is no restriction on their movements. Coupled with the existing highway layout this is a significantly negative aspect of the site.</p> <p>The development would provide the opportunity for a substantial improvement to the appearance of the site, blending it into the existing residential area and providing a far more attractive boundary for the residential area of this part of Hutton.</p> <p>The improvements to the highways, the removal of HGV movements, the cessation of noise and disturbance and the substantial improvement to the appearance of the site are significant matters which all help to justify the development proposed.</p> <p>The form of development proposed would be a residential development of say 14no. units of a scale that reflects the existing development on site. There would be an opportunity for new landscape planting to be created to enclose the site and most likely a single and improved access on to Ratten Lane. It is considered that such a development reflects closely the policy of para. 89, bullet point 6 of the NPPF.</p>
115	210	Chapter C - Policy C2 - Moss Side Test Track	<p>I represent a group of 40 very disappointed older people who reside at Hazel House Nursing Home, and in excess of 50 members of staff. They and I have only just learned, via the Leyland Guardian, of your consultation regarding the development proposals that will affect Paradise Lane.</p> <p>We are surprised that as the largest community of residents, housed in the building located closest to the proposed site, we have not had adequate notification of your proposals provided directly to us. Furthermore, we are extremely disappointed that you do not seem to have taken sufficient account of the needs of this frail, vulnerable group of senior citizens in your consultation</p>



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			<p>process. Essentially, they appear to have been excluded on grounds, the basis of which, appear to be their disability, age, poor mobility and ability to comment in person. The whole notion of social inclusion seems to have been turned on its head by inconsiderate planning.</p> <p>Furthermore, we wish you to know that if these plans go ahead as proposed, the peaceful end phase of life for a large number of vulnerable older people will be instantly destroyed. Moreover, safeguarding will become even more difficult and their freedom will be severely restricted by a substantial increase in the volume of traffic, including heavy goods vehicles, and noise levels.</p>
116	211	Chapter C - Policy C3 - Site W	<p>I am writing to represent the interests of the Farington Moss Residents Action Group; a large group of residents whose concern is to ensure that the safety, character and amenity of their own homes are not compromised by inappropriate development of the surrounding area.</p> <p>The Group wish to lodge a collective objection to the proposed allocation of land for development between Heatherleigh and Moss Lane as defined in the published LDF Policy C3, Map Ref W. Individual objections from local residents have also further details of residents' views.</p> <p>The Group feel the proposed development should be abandoned due to compromised road safety, increased traffic, reduced green space, destruction of established wildlife, loss of amenity, loss of value, increased noise and air pollution.</p> <p>It is felt that the proposals for the area have significant shortcomings, particularly with respect to the increase in vehicular traffic associated with a development of the proposed size. Attempting to travel by road between Leyland and Preston during morning and evening peak times will reveal the extent to which the local road capacity has already been exceeded, with several kilometres of queuing traffic often in each direction. No detail is provided of any planned infrastructure developments or even recommendations such as increasing local road network capacity, enlisting the help of Sustrans in the development of appropriate access routes, and engaging Fishwick and Sons bus company to increase the usability of their Croston road bus route.</p> <p>The group applaud the original (SR110) proposals attempting to include amenity space within any proposed development.</p> <p>Our core objections are as follows:</p> <ol style="list-style-type: none"> <li>1. Massively increased traffic, compromising road safety.</li> <li>2. Massive increase in noise levels.</li> <li>3. Increased flood risk and water drainage problems.</li> <li>4. The outlook and environment for all residents will change considerably as the landscape to the rear of many houses affected has been wildlife, fields and trees.</li> <li>5. Increased traffic flow will add atmospheric and air pollution.</li> <li>6. The land to the south of the Moss Lane houses has in May 2012 experienced a felling of a large amount of mature trees (damaging a long established wildlife ecosystem. This ecosystem includes a pair of barn owls that live in the trees behind no.11 Moss Lane, a number of wild birds including a greater spotted kingfisher, a nearby colony of bats and a large number of hedgehogs).The evidence of this felling is still visible. As the land was protected / safeguarded by the council as D8, the council have failed to enforce this protection. We would ask that the Council to take note of what appears to be an attempt to pressurise residents and the council by removing these trees / wildlife and outlook and to influence the planning authority, by presenting an already changed environment, perhaps to avoid any environmental assessment and increase opportunity for future housing planning applications.</li> <li>7. Significant risk to pedestrians, particularly vulnerable pedestrians, including children, disabled and elderly pedestrians on Moss Lane.</li> <li>8. Massively increased numbers of pedestrians using Moss Lane for access.</li> </ol> <p>Moss Lane Specific Notes</p> <p>One of the access points for Site W is quoted as Moss Lane, even though this is a single track lane, mostly without pavement, and should be returned to a No-Through road status now to avoid a further inappropriate and unsustainable increase in its use which is significantly compromising road safety. If the no-through road cul-de-sac status is appropriate for residents and farmers on Bannister Lane the same approach should apply on the smaller moss lane to protect the public with regard to road safety.</p> <p>The Council should note its decision on land usage is likely to be ultra vires owing to the inadequate direct consultation with neighbouring residents and needs to run a new full consultation on the proposal to redesignate the land south of Moss Lane to avoid lengthy legal processes. Until that point the land use should be returned to protected yellow land.</p> <p>South Ribble Borough Council has gone to some lengths to inform local residents of the land use change proposals, however ultimately these did not reach the majority of the affected residents, and the Farington Moss Residents Action Group can provide the resource to ensure affected parties are appropriately informed in a timely fashion.</p> <p>It is felt that the HCA and the Landowner consortium should engage with the Farington Moss Residents Action Group please contact below for consultation purposes.</p>
117	212	Chapter G - Policy G13	<p>We welcome the strong protection which the policy gives to ancient woodland defined in Natural England's inventory of ancient woodland. We also welcome the wording in para 10.72 of the justification which states that ancient woodland is irreplaceable.</p> <p>However, we believe there are still some important flaws in the policy wording.</p> <p>The Natural England inventory of ancient woodland is not a comprehensive record of ancient woodland. When the inventory was compiled in the 1980s, it was decided to only record ancient woods of more than 2 hectares in size so many smaller ancient woods were not recorded. We would like to see your policy specify that all ancient woodland should be protected and measures</p>

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			<p>put in place to identify and record those smaller woods which are not on the inventory.</p> <p>We would also like to see protection of ancient and veteran trees specified in para a of the policy. These are individual trees of significant age and conservation importance and in the wording of the National Planning Policy Framework they are deemed worthy of strong protection just like ancient woodland. " planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland....."</p> <p>We welcome the commitment in para c of the policy to replacing trees which are unavoidably lost to development. Many local authorities have adopted a policy of a two for one (or even three for one in some cases) replacement ratio, recognising the reduced amenity benefits of a young tree compared to an older one and the fact that many newly planted trees (particularly in busy urban environments) may not survive. We would urge you to consider more than one for one replacement for these reasons.</p> <p>Para b does talk about enhancement of tree cover but we would like to see a stronger wording here which commits the Council to significant tree planting and woodland creation. We would like to see the Council adopt targets for tree planting and expanding woodland cover. The recently published Independent Panel on Forestry has recommended an increase in woodland cover from 10% to 15% across England by 2060. We would like to see all local authorities adopt woodland creation plans and targets which will contribute to this national aspiration.</p>
117	213	Chapter G - Policy G10	<p>Our comment here follows on from our previous comment on woodland creation.</p> <p>We welcome the commitment in Policy G10 to providing GI in all residential developments of more than five dwellings. We would like to see specific reference in the policy to the important role which trees and woods can play as a part of a well integrated network of green infrastructure in new development.</p> <p>A Forest Research Report on Benefits of Green Infrastructure states that trees and woods are vital to the health of people in the UK. There is a strong correlation between the quality of the natural environment where people live and their wellbeing. Increasing tree and woodland cover can be seen to reduce the impacts of poor air quality, mitigate some of the effects of a warming climate, particularly in urban areas, and increase opportunities for people to adopt a healthy lifestyle - see the Forestry Commission's publication Benefits of green infrastructure (Report by Forest Research, October 2010).</p> <p>More native trees and woods could save millions of pounds in healthcare costs in a time of constrained public expenditure. Around £110bn is spent each year in the UK on healthcare, equal to 8.5% of all income. It has been estimated (Natural England, Our Natural Health Service, 2009) that if every household in England had good access to quality green space, it could save around £2.1bn annually in health care costs and woodland can be a major contributor to this saving.</p> <p>We welcome the Council's decision to adopt access standards for various types of green infrastructure, including one on natural greenspace. Because of the particularly wide range of social, economic and environmental benefits provided by woodland, we would like to see a separate accessibility standard for woodland.</p> <p>The Woodland Trust has developed a Woodland Access Standard which you may like to consider for adoption in your development plan policies document. We would be happy to talk to you further about how this could be used to produce ambitious but realistic woodland creation targets for the Council.</p> <p>The Woodland Access Standard aspires:</p> <ul style="list-style-type: none"> <li>• That no person should live more than 500m from at least one area of accessible woodland of no less than 2 ha in size</li> <li>• That there should also be at least one area of accessible woodland of no less than 20 ha within 4km (8km round trip) of people</li> </ul> <p>TABLE</p> <p>From the table it can be seen that people in South Ribble have better access to woodland than the average for Lancashire but less access than people in then neighbouring district of Chorley. Space for People' is the first UK-wide assessment of any form of greenspace and, while the targets may seem challenging, they represent the result of detailed analysis. The full 'Space for People' (pdf) report can be found at <a href="http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx">http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx</a>.</p> <p>Chapter J: Tackling Climate Change We would like to see reference in this chapter to the important role which trees and woods can play both in mitigation of climate change (by sequestering carbon from the atmosphere) and in adaptation, for example by helping reduce urban temperatures in summer, alleviating flood risk and improving air quality. The Woodland Trust has produced two reports which explain the benefits of trees in flood alleviation and air quality improvement. These can be found on our website at: <a href="http://www.woodlandtrust.org.uk/SiteCollectionDocuments/pdf/woodswater26_03-08.pdf">http://www.woodlandtrust.org.uk/SiteCollectionDocuments/pdf/woodswater26_03-08.pdf</a>  <a href="http://www.woodlandtrust.org.uk/en/campaigning/our-campaigns/Documents/urbanairqualityreport.pdf">http://www.woodlandtrust.org.uk/en/campaigning/our-campaigns/Documents/urbanairqualityreport.pdf</a></p>
117	214	General	<p>In respect of the site allocations document, my colleague Jacquie Cox of our Woods Under Threat Team commented in detail on these at the preferred options stage (see her letter to the Forward Planning Team dated 14 December 2011). We can supply a further copy of this letter if you no longer have it to hand.</p>

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118	215	Chapter G - Policy G12 - Green Corridors	<p>I suggest that the isolated River Lostock Country Park, Sherdley Road should be linked to the green corridor to the East of Watkin Lane adjacent to Resolution Bridge by assigning green corridor status to the two fields between the parks and adjacent the River Lostock which are currently shown as green belt &amp; area of separation. I attended a planning committee meeting in June 2012 where an application to develop these two fields for caravan storage was refused unanimously. Numerous councillors spoke about the importance of preserving the two fields for the wildlife of the area and increasing the protection from development would help achieve this.</p> <p>I believe under the Water Resources Act 1991 and the Land Drainage Act 1991 The Environment Agency require a clear buffer of 8m between any development and the top of the river bank. By using this area (in sites d, 10 &amp; g) a path from Leyland to Bamber Bridge could be made, the majority of which would be adjacent the river, by linking exist rights of way together.</p> <p>Starting from Mill Lane footbridge (Noth of Earnshaw Bridge) a new path could be made along the bank to link to the existing path / footbridge adjacent Farington Road. From this point the existing path would be used to Fowler Lane and the railway crossed by Fowler Lane bridge. Having crossed the bridge footpath No.FP6 would be followed to Farington Road. From here a new path could be made along the Western boundary of field No.2 (referred to in my first paragraph) then along the river bank to Watkin Lane. From this point existing paths link to Bamber Bridge.</p> <p>It is vitally important to link as many green areas together as possible and protect them from development for the future generations of the Borough.</p>
119	216	Chapter C - Policy C4 - Cuerden Strategic Site	<p>We are instructed to submit this representation on behalf of Stoney Lane Farm Ltd, the Burgess Family and Mr &amp; Mrs Bennett; being the freehold owners of the three largest private landholdings within the Cuerden Strategic Site. Indeed between them, these clients own and control in excess of 26% of the Cuerden Strategic Site.</p> <p>In broad terms we endorse the flexibility set out in Policy C4 to allow a wide range of uses in order to achieve the best comprehensive development of this strategic gateway site. We are nevertheless concerned that comprehensive development, by its very nature, may take years to bring about; and so we endorse the emphasis, at paragraph 6.29 of the Justification, that the comprehensive development of the Cuerden Strategic Site should be accelerated.</p> <p>However, in the absence of such emphasis within the wording of the Policy itself, the danger is that a comprehensive development solution may result in planning blight. This would not only be detrimental to the interests of the aforementioned clients, but to other private property owners (particularly those householders living on Old School Lane and Stoney Lane) and, indeed, to the interests of the local plan as a whole. The aspirations of your Council to attract significant inward investment to this site are of course well known.</p> <p>We feel that significant weight should be given to development that can be brought forward at the earliest practicable opportunity. We therefore recommend that the wording of Policy C4 should be amended to incorporate the emphasis on accelerated development which is contained in paragraph 6.29 of the Justification.</p> <p>Please do not hesitate to contact the writer should you have any queries or require any further information concerning this representation.</p>
120	217	General	<p>Representation: Managing Director, on behalf of Progress Housing Group;</p> <ul style="list-style-type: none"> <li>• It is a very useful and comprehensive document which clearly sets out the future development plans for the borough.</li> <li>• We fully support the vision.</li> <li>• We welcome the focus on housing provision in the borough and will fully support the development process with respect to the provision of affordable housing.</li> <li>• We would ask SRBC to consider using income from the Community Infrastructure Levy to support the provision of affordable housing.</li> <li>• We welcome the Section 106 proposals.</li> </ul> <p>Representation: Senior Development Manager on behalf of Progress Housing Group;</p> <ul style="list-style-type: none"> <li>• We are encouraged to see the importance given to affordable housing both in terms of meeting existing needs and providing homes to assist in meeting economic growth targets.</li> <li>• We support the policy which recognizes and seeks to rectify the shortfall in new housing in recent years</li> </ul>
121	218	Chapter C - Policy C5 – BAE Systems, Samlesbury	<p>We have been instructed by our client, BAE Systems (“BAES”), to submit representations on the above document on its behalf in respect of its Samlesbury Aerodrome site (“the Samlesbury site”).</p> <p>Site Description and Background</p> <p>The site is located within the jurisdiction of both Ribble Valley Borough Council and South Ribble Borough Council. It is situated approximately 5.9 miles to the east of Preston, close to the settlement of Osbaldeston. The site is accessed via the A59, which connects to the A677 and the M6 at Junction 31. A site plan is enclosed for your information. The site contains a number of operational buildings, including high-tech component manufacturing facilities, which in total occupy approximately 189,000 sq m (2 million sq ft) of floor space within a site area of 142 hectares (351 acres). Approximately 58 hectares (144 acres) are designated as Green Belt within the South Ribble Borough. Approximately 3,800 people are employed at the site.</p> <p>In the past 10 years, BAES has invested approximately £200 million in buildings, plant and equipment at the site. This investment has positioned the site as the UK’s most advanced aerospace manufacturing location and maintained its place amongst the world leaders in defence manufacturing, becoming a “Centre of Excellence” for advanced engineering and manufacturing (AEM) operations.</p>

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			<p>The Samlesbury site, and BAES' facilities at Warton, are collectively known as the "Warton Unit". The Warton Unit accommodates the leading aerospace cluster in the country, and arguably the most important aerospace centre in Europe. BAES is Lancashire's largest single industrial employer and the Samlesbury site is at the centre of the County's aerospace supply chain.</p> <p>Following a review of the plans of BAES in the context of the aerospace industry in the North West of England, an Ernst and Young study made the following conclusions:</p> <ul style="list-style-type: none"> <li>■ The sector creates one of the highest levels of Gross Value Added (GVA) in the North West of England;</li> <li>■ The sector in the North West of England can be demonstrated as being European leading in scale and technology;</li> <li>■ The sector in the North West of England has the critical mass and the common interest of partners allowing a huge opportunity for effective intervention; and</li> <li>■ The sector has sufficient clarity on long term future activity to be able to build an effective strategy.</li> </ul> <p>Today the aerospace industry's revenue is derived from two value streams. The first is from new build aircraft engines and components, with the second being derived from support and upgrade to in-service products. The Joint Striker Fighter (JSF) is the latest start-up programme and is planned to enter service in 2012/13, with the new-build phase of the product lifecycle extending through to 2028. From its current position, the Samlesbury site has the potential and the opportunity to play a major role in the design and manufacturing of the JSF programme. As a global requirement, the JSF is the next generation replacement for the F16 and F18 combat aircraft, 4,600 of which are currently in service and are operated by 30 of the Nato-aligned countries airforces. BAES' workshare arrangement on the JSF will see 10-12% of the work content of the airframe, predominantly the Rear Fuselage and the Vertical and Horizontal Tail sections of the aircraft, manufactured in the North West region.</p> <p>The JSF programme is currently in the development phase and will progress to full rate production in 2014/15. Contractually, this will be achieved by the US Department of Defence releasing funding progressively for "Lots" (batches) of aircraft, with Lot 11 onwards reflecting the programme attaining full rate production which could equate to in excess of 20 aircraft deliveries per month.</p> <p>BAES has to invest between £450 and £650 million to provide the capacity and capability to achieve JSF build rates. In order to progress this expansion and investment plans, outline planning permission was granted in 2007 for the development of 99,848 sq m (1.07 million sq ft) of industrial floor space at the Samlesbury site, as well as a new access from the A59. Reserved matters planning permission has also been granted for the first phase of the development, comprising 2 no. 90,000 sq ft offices and 60% of this development is either now completed or in the process of completion.</p> <p>Notwithstanding the above, BAES has recently announced that it would be cutting jobs at both the Warton and Samlesbury sites. In response to this, and in a bid to boost the local economy, the Government has announced that both sites will be designated as Enterprise Zones. These Enterprise Zones will allow for the development of a cluster of advanced engineering and manufacturing (AEM) business at both sites. Such businesses will include high-end automotive, renewable energy, nuclear, autonomous systems engineering, and general aviation industries. The Enterprise Zones have the potential to create 4,000 to 6,000 high value AEM jobs.</p> <p>The Enterprise Zone at Samlesbury Aerodrome will cover the area shown in green on the enclosed plan (Parcels A, B and C), with BAES continuing to operate on the area shaded yellow (Parcel D).</p> <p>In addition, BAES has recently secured a £1.9 billion deal to supply Hawker Training Jets to Saudi Arabia. The contract will involve the manufacture of 22 aircraft across the Samlesbury and Warton sites. In light of the successful Enterprise Zones bid at Samlesbury and the site's continued importance to the aerospace industry, demonstrated by securing the Saudi Arabia Hawker Training Jet contract, the site is clearly of importance to the local, regional and national economy. As such, BAES requires that the South Ribble Local Development Framework (LDF) fully supports the development of the Enterprise Zone at the site, including the delivery of necessary infrastructure improvements required to enable its delivery, and continues to support BAES' operations at Samlesbury.</p> <p>Previous Representations</p> <p>BAES previously submitted representations to the South Ribble LDF Site Allocations and Development Management Policed Development Plan Document (DPD) Preferred Options in December 2011. These representations specifically commented on Policy C4 (renumbered Policy C5 in the Publication Version of the Site Allocations and Development Management Policies DPD) which seeks to guide the development of the Samlesbury Aerodrome site. The representations supported references in the Policy to the promotion of BAES' activities and the development of an Enterprise Zone at the site.</p> <p>These representations however objected to the extent of the area designated on the Proposals Map as the Enterprise Zone and requested that this was extended to include the land which will</p>

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			<p>form Phase Two of the Enterprise Zone (Parcel B on the enclosed plan).</p> <p>In light of the above, please find below BAES' representations to the South Ribble LDF Site Allocations and Development Management Policies DPD Publication Version.</p> <p>Representations to the South Ribble LDF Site Allocations and Development Management Policies DPD Publication Version Policy C5 – BAE Systems, Samlesbury</p> <p>Support for the Development of an Enterprise Zone and AEM Activities Policy C5 seeks to continue to support BAES' advanced aerospace manufacturing activities at Samlesbury in line with the Company's objectives and supports the development of an Enterprise Zone at the site.</p> <p>BAES' previous representations on the Preferred Options version of this policy supported reference to the promotion of BAES' activities at the site in line with Company's objectives. The Publication Version has not changed this policy in this respect, and the policy still supports BAES' activities.</p> <p>BAES supports this and considers that support for BAES' activities at the site makes the policy sound in this respect. BAES' Samlesbury site is a significant employer in the region and as stated above plays a major role in the economy of the wider region and the national aerospace sector. Continued support for BAES' activities at the site is therefore considered to be the most appropriate strategy for meeting the employment needs of the South Ribble District and the wider region. It is therefore considered that Policy C5 is justified in this respect.</p> <p>Similarly, Policy C5 also promotes the development of an Enterprise Zone at the site. BAES supports the promotion of the Enterprise Zone. In particular, the Samlesbury site is considered to be the most appropriate location in the area for the Enterprise Zone. As well as the benefits associated with Enterprise Zone status (such as reduced business rates and simplified planning rules), the sites good access to the strategic road network, including the M6 Motorway at Junction 31, would assist in attracting inward investment into the area. The most important factor in attracting inward investment however, is considered to be the existing operations at Samlesbury Aerodrome. BAES' existing operations at the site have the potential to attract a range of new businesses to the area, particularly in the Advanced Engineering and Manufacturing (AEM) sector and associated supply chains due to the benefits of being located close to a major AEM company such as BAES.</p> <p>The Samlesbury site and Enterprise Zone therefore offers the opportunity to develop a cluster of AEM businesses and their associated supply chains at the site, creating a "Centre of Excellence" for AEM activity in the North West.</p> <p>The AEM sector in the North West is the largest manufacturing sector in the UK and is the only sector in the North West which has an average GVA per head which is higher than the national average. However, the "Manufacturing Strategy and Action Plan for England's North West" (2009) produced by the former North West Regional Development Agency (NWRDA) identifies the that the North West's manufacturing sector is facing significant challenges brought about by factors such as increasing competition, particularly from overseas. It identifies that a major weakness of the North West's manufacturing sector is that supply chain links between large production businesses within the region and suppliers are poor. It is therefore considered that the designation of the Samlesbury site as an Enterprise Zone would assist in forging these links and would therefore strengthen the AEM sector in the North West.</p> <p>In light of this, it is considered that Policy C5 should specifically refer to, and promote the development of AEM uses and their supply chains at the Enterprise Zone as it is considered that this would be the most appropriate option for growing the manufacturing sector in the North West.</p> <p>It is also considered that specifically referring to the development of AEM uses at the Enterprise Zone would make Policy C5 more in conformity with the National Planning Policy Framework (NPPF), and in particular the Government's "pro-growth" agenda set out in the NPPF. The NPPF states that Government is committed to securing sustainable economic growth, and in particular build on existing strengths. As stated above, the manufacturing sector in the North West is one of the region's and country's strengths and support of these uses at the Enterprise Zone would assist in building on this strength.</p> <p>It is therefore requested that the following text is added to Part B of Policy C5: "Land has been allocated at Samlesbury Aerodrome to allow for the development of an Enterprise Zone. This Enterprise Zone will consist of a cluster of advanced engineering and manufacturing businesses and associated industries."</p> <p>This addition was requested in BAES' representations to the Preferred Options Version of the Site Allocations and Development Management Policies DPD. South Ribble Borough Council's response was that the types of uses that will be acceptable at the site would be set out in the Local Development Order (LDO) and there was no need to repeat these in Policy C5. BAES does not agree with this statement however. It is considered that reference to the uses which will be</p>



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			<p>permitted at the Enterprise Zone in Policy C5 would ensure that any future LDO for the Enterprise Zone would reflect local planning policy in the LDF. However, if the Council and Secretary of State, or the Inspector appointed on his behalf, consider that it is not necessary to repeat the detail of Appropriate uses on the site in Policy C5, it is requested that Policy C5 instead makes reference to the site being developed for the uses stated in the LDO. This would continue to ensure that Policy C5 and the existing LDO for the site and any further LDO are in accordance. The following wording is suggested to achieve this:</p> <p>The Council supports the delivery of the Enterprise Zone and has produced a Local Development Order – Part 1, to aid the delivery process. Subsequent Local development Orders will be produced when necessary. A masterplan must also be produced as a key part of the overall delivery of the Enterprise Zone. The site will be developed in accordance with the uses permitted in the Local Development Orders and the site masterplan.”</p> <p>Green Belt Roll Back</p> <p>Policy C5 also states that an area of the Samlesbury site will be removed from the Green Belt to facilitate the development of the Enterprise Zone. BAES fully supports this. As stated above, it is considered that the Samlesbury site is the most appropriate option for meeting the employment and economic needs of the Borough and wider region.</p> <p>Removal of this area of land (Parcel B) from the Green Belt would therefore enable this policy to be delivered and the economic and employment needs of the Borough and wider area to be met. It is therefore considered that identifying that this area of the site will be removed from the Green Belt in Policy C5 makes the policy effective and therefore sound in this respect.</p> <p>In addition to the above, the NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. It is considered that the substantial economic benefits that would arise as a result of the designation of the Samlesbury site as an Enterprise Zone, including the creation of many direct and indirect jobs and a significant increase in inward investment, are exceptional circumstances that warrant the removal of Parcel B from the Green belt.</p> <p>Furthermore, Parcel B currently includes the runway and other areas of hardstanding. It doesn't therefore contribute to the openness of the Green Belt and its removal would not have a negative impact on the overall impact on the Green Belt.</p> <p>Infrastructure Requirements</p> <p>The Justification to Policy C5 refers to the need for a new highway junction into the Samlesbury site to enable the delivery of the Enterprise Zone. Policy C5 should reference the requirement for dedicated access to fully realise the build out opportunities of the Samlesbury Enterprise Zone following initial feedback from master planning activities. This includes a revision to the East Gate configuration to access “Parcel A” penetrating off the A59 and an additional entrance being opened up off the A677 to facilitate full build out of “Parcel B”.</p> <p>BAES stated in previous representations to the Preferred Options Version of the Site Allocations and Development Management Policies DPD that reference to Enterprise Zone Access should be added to the wording of Policy C5.</p> <p>It is still considered that the policy wording of Policy C5 should make reference to the access requirements as described above into the site, and without this reference the policy is unsound as it is not deliverable and therefore not effective.</p> <p>In order for the Enterprise Zone to be delivered and fully realise the economic benefits predicted, the dedicated site access requirements as identified by initial master planning output is a critical enabler. Therefore, in order to facilitate the delivery of the Enterprise Zone and to ensure that Policy C5 is deliverable and effective, reference should be made within Policy C5. It is therefore requested that the following text is added at the end of Part B of Policy C5:</p> <p>“In order to fully realise the full build out and economic benefits of the Enterprise Zone at Samlesbury, dedicated access is required through the revision to the East Gate access configuration to access ‘Parcel A’ penetrating off the A59 and an additional entrance being opened up off the A677 to facilitate full build out of ‘Parcel B’.”</p> <p>Proposals Map and Appendix 3 Map</p> <p>BAES’ previous representations to the Preferred Options Version of the Site Allocations and Development Management Policies DPD objected to the extent of the Samlesbury Strategic Site allocation on the Proposals Map and the map at Appendix 3 of the Site Allocations and Development Management Policies DPD. In particular, Parcel B on the enclosed plan (covering the runway area) which represents the Phase Two area of the Enterprise Zone was excluded from Strategic Site Allocation. BAES requested that both maps were amended to show that this area also formed part of the Strategic Site. AEM uses are typically developed at low densities and it was considered therefore that this area of land would be needed as a second phase of the Enterprise Zone.</p> <p>The Proposals Map has now been amended to reflect this, and Parcel B is now shown as part of the Strategic Site. BAES therefore now supports the extent of this allocation on the Proposals Map and considers it to be sound as it is in conformity with the LDO for the Enterprise Zone. However, the map at Appendix 3 of the Site Allocations and Development Management Polices DPD</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>identified Parcel B as an area of land to be removed from the Green Belt, but does not show it to form part of the Strategic Site.</p> <p>Whilst, as stated above, BAES supports the removal of Parcel B of the site from the Green Belt, it is considered that Parcel B should also be shaded purple to show it is part of the Enterprise Zone and Strategic Site on the map at Appendix 3. This would provide clarity to the full extent of the Strategic Site and ensure that the extent of the Strategic site on this map is the same as that shown on the Proposals Map.</p> <p>Conclusion  Samlesbury Aerodrome is recognised as a “Centre of Excellence” for advanced manufacturing and forms part of the Warton Unit, which is the leading aerospace cluster in the Country, and arguably, one of the most important in Europe. There is the opportunity to build on the existing advanced manufacturing strengths of the site, following its designation as an Enterprise Zone, through the development of a cluster of AEM businesses. This would strengthen the role of the site in the regional economy and its role as one of the most important aerospace sites in Europe. It would retain and create highly skilled jobs, and would ensure that the manufacturing sector in the North West remains the largest manufacturing sector in the UK.</p> <p>BAES therefore requests that the South Ribble LDF supports the establishment of an AEM Enterprise Zone at Samlesbury Aerodrome and allows for Green Belt boundaries to be amended to exclude the Phase Two area of the site, and also permits the necessary site access improvements to enable the development of AEM uses at the site.  BAES therefore supports in principle Policy C5 in the Site Allocations and Development Management Policies DPD. However, it is requested that the policy is amended to specifically refer to the development of AEM uses at the site and refers to the development of a new highway junction to access the site. It is also requested that the area currently shown on the map at Appendix 3 of the Site Allocations and Development Management Policies DPD as the area to be excluded from the Green Belt (Parcel B on the attached plan) is also identified on this map as part of the Strategic Site, as shown on the Proposals Map, as this area will be Phase 2 of the Enterprise Zone.</p> <p>It is also requested that Policy C5 makes reference to the requirement for, and the delivery of, a new access junction to the site. It is considered that the above amendments would make Policy C5 more justified and effective and therefore sound. We reserve the right to amend or withdraw these representations if necessary.</p> <p>Finally, we trust the above is clear and satisfactory; however, if you require further information or would like to discuss the above, please do not hesitate to contact either Paul Forshaw, Alex Willis or David Couch at the above office. Otherwise, we would be grateful if you would acknowledge receipt of these representations and confirm they have been “duly made”.</p>
122	219	Chapter B - Policy B3 - South Rings Business Park	<p>As you know HOW Planning (HOW) has been instructed by Muse Developments Ltd (Muse) to prepare and submit representations to the above Consultation Paper. The representations are made in relation to South Rings Business Park in Cuerden and enclosed is a completed Representation Form.</p> <p>HOW submitted representations on behalf of Muse in relation to the earlier versions of the DPD namely the Issues and Options Paper (September 2010) and the Preferred Options Paper (October / November 2011). We request these earlier representations are read in conjunction with the representations set out in this letter.</p> <p>The representations that follow relate solely to the draft policies contained in the Publication Version Consultation Paper. Where necessary, the representations propose changes to the draft policies. It is requested that the representations are fully considered by South Ribble Borough Council (SRBC) in the preparation of the emerging Site Allocations and Development Management Policies DPD and other emerging Local Development Framework (LDF) documents.</p> <p>Adopted Planning Policy</p> <p>South Rings Business Park is allocated as Employment Land in accordance with the South Ribble Local Plan adopted in February 2000. Local Plan Policy EMP1 (Allocation of Employment Land) states:  “Land is allocated as follows (and is shown on the Proposals Map) for the employment purposes to meet the Borough’s projected needs from 1995 to 2006.</p> <p>The land at between Lostock Lane and the M65, Cuerden may be developed for a wide range of employment generating uses, including business, commercial and leisure uses. This land must be developed comprehensively to a high quality and to a high standard of design and landscaping.”</p> <p>Site A between Lostock Lane and the M65, Cuerden referred to in Policy EMP1 is now known as South Rings Business Park. The Council has historically recognised the potential of the site to be developed for a wide range of employment generating uses and have not restricted it to simply employment development falling within the “B” Use Classes. This is reflected through the reference to commercial and leisure uses and the Local Plan Glossary of Terms defines commercial development as:  ‘Uses within Classes A1, A2 and A3 of the Town and Country Planning (Use Classes) Order 1987’.</p> <p>Emerging Planning Policy</p> <p>The draft Proposals Map which accompanies the Consultation Paper proposes to allocate South Rings Business Park as a ‘Mixed Employment and Commercial Site’. The draft document contains a policy of direct relevance to South Rings Business Park; Policy B3 (Commercial and Employment Site at South Rings Business Park, Bamber Bridge).</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>Draft Policy B3</p> <p>Draft Policy B3 states:  “Within the area defined on the Proposals Map at South Rings Business Park, Bamber Bridge, new development, redevelopment or change of use will be permitted to provide offices, non-food retail, employment, leisure, recreation and tourism facilities, provided that:  a) Comprehensive development of the site is demonstrated through the submission of a Masterplan;  b) A phasing and infrastructure delivery schedule is set out and,  c) The implementation of a high quality development in accordance with an agreed Design Code.”</p> <p>In principle, Muse fully supports SRBC’s proposals to allocate South Rings Business Park as a Mixed Employment and Commercial site. In the earlier version of the draft DPD, the Preferred Options Consultation Paper proposed to allocate South Rings Business Park for employment under draft Policy E1 which would have restricted future development at the site to employment uses including business, general industry or storage and distribution (Use Classes B1, B2 and B8). In line with draft Policy E2 of the Preferred Options Consultation Paper, the remaining land at South Rings Business Park would have been protected solely for these uses and all the flexibility currently enjoyed under the site’s allocation in the adopted Local Plan would have been lost.</p> <p>Muse are therefore highly supportive in principle of the Council’s approach to allocate South Rings Business Park as a Mixed Employment and Commercial site through the introduction of draft Site Specific Policy B3 in the Publication Version Consultation Paper. However, Muse does have objections with the detailed wording and requirements of draft Policy B3 which are described below.</p> <p><b>Non-Food Retail</b></p> <p>As highlighted above, South Rings Business Park allocation in the adopted Local Plan identifies commercial development as one of the acceptable uses at the site. The Local Plan in the Glossary of Terms defines commercial development as a use falling within A1, A2 and A3 use classes. The Local Plan is flexible and makes no specific reference to the type of retail which is acceptable at the site.</p> <p>Draft Policy B3 of the Publication Version Consultation Paper seeks to restrict new development, redevelopment or change of use to provide a range and mix of uses including non-food retail. The emerging policy is therefore less flexible than the existing Local Plan allocation as it seeks to restrict the type of retail development to non-food retail.</p> <p>The undeveloped parcels at the site have been extensively marketed for a period of 11 years and there has been limited interest for the take up of employment development. Currently the site is subject to encouraging end user demand for commercial development outside Use Classes B1, B2 or B8 and will deliver significant employment and investment benefits for the area.</p> <p>The Local Plan Allocation remains fit for purpose and Muse request that the full range of uses should be carried forward into the emerging Site Allocations and Management Policies DPD. There have been no material change of circumstances which warrant a more restrictive approach to this site and there is no basis for restricting the range of retail uses which the Council considered acceptable at the time the Local Plan was prepared.</p> <p><b>Submission of a Masterplan</b></p> <p>It is unclear from the wording of the draft Policy as to whether the Council require the comprehensive development of the site to be demonstrated through the submission of a Masterplan prior to the submission of a planning application or as part of a planning application submission.</p> <p>Once a suitable end user has entered into an agreement with Muse, it would not be Muse’s intention to submit a Masterplan for approval for development control purposes prior to the submission of a planning application. This approach would result in additional and unnecessary time and cost implications.</p> <p>We recognise that this approach may be required on some of the Strategic Sites allocated for development across the Borough however it is our view that the extent of undeveloped land at South Rings Business Park does not warrant the requirement for the submission of a Masterplan prior to a planning application. Rather, Muse would prepare and submit an agreed Masterplan as part of any future planning application for the remaining undeveloped parcels at the site.  Furthermore, Muse would expect any infrastructure requirements of the Council to meet the CIL regulations and consideration should be given to the extent of commuted sums provided by Muse as part of the previous overarching outline planning permission for the mixed use development of the site.</p> <p><b>Changes to Draft Policy B3</b></p> <p>Having regard to the above, Muse propose that draft Policy B3 is revised as shown in parenthesis below:</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>“Within the area defined on the Proposals Map at South Rings Business Park, Bamber Bridge, new development, redevelopment or change or use will be permitted to provide offices, retail, employment, leisure, recreation and tourism facilities, provided that:</p> <p>a) Comprehensive development of the site is demonstrated through a Masterplan submitted as part of a planning application;  b) A Phasing and Infrastructure Delivery Schedule is set out; and  c) The implementation of a high quality development in accordance with an agreed design code.”</p> <p>Summary</p> <p>In summary, Muse welcome the changes made by SRBC through the preparation of the Publication Version of the draft DPD and support the proposal to allocate the South Rings Business Park site as a Mixed Employment and Commercial site under Site Specific Draft Policy B3. However Muse has raised objections to the detailed wording and requirements of Draft Policy B3 which seeks to reduce the flexibility the site currently enjoys through its mixed use allocation in the adopted Local Plan by restricting the type of retail to solely non-food retail. Furthermore, clarification is required as to which stage the Council seek the submission of a Masterplan to demonstrate the comprehensive development of the site. It is Muse’s intentions to provide a comprehensive Masterplan as part of a planning application submission.</p> <p>We trust these representations will be considered in the preparation of the emerging Site Allocations and Development Management Policies DPD. We would be grateful if you could confirm safe receipt and provide notification of future consultations relating to this and other LDF Documents.</p>
123	238	Chapter D - Policy D3	<p>I am a Chartered Surveyor working for P Wilson &amp; Company LLP Chartered Surveyors, Preston. P Wilson &amp; Company LLP wishes to comment on Proposed Policy D3 – Agricultural Workers Dwellings in the Countryside, which details the criteria for new agricultural worker dwellings, and removal of conditions restricting the occupancy of existing agricultural workers dwellings. Our comments relate to the latter part of this proposed policy.</p> <p>South Ribble Borough Council has proposed the following</p> <p>c) where existing dwellings are subject to conditions restricting occupancy, applications to remove such conditions will not be permitted unless it can be demonstrated that:</p> <p>i) the essential need which originally required the dwelling to be permitted no longer applies in relation to the farm unit and that the dwelling will not be required similarly in the longer term; and</p> <p>ii) reasonable attempts have been made to dispose of the dwelling for occupation in compliance with the original condition.’</p> <p>We comment on each criterion as follows:</p> <p>i) agreed, it should be established whether an essential need still applies;</p> <p>ii) not agreed. As Chartered Surveyors who regularly advise clients on rural planning matters, we have serious reservations about reliance on ‘reasonable attempts to dispose of a dwelling’ as the means for assessing whether occupancy conditions should be removed for the following reasons:</p> <ul style="list-style-type: none"> <li>• Should the marketing result in a level of interest in the property, or indeed an offer to purchase, all that normally demonstrates is an ability (on the part of the prospective purchaser) to comply with the Agricultural Occupancy Condition. Without an interrogation of the circumstances of the interested parties, the mere ability to comply cannot be said to be evidence of ‘need’.</li> <li>• Indeed it is our experience, in marketing Agricultural Workers’ Dwellings, that interest is often expressed by persons who are unable to comply with the occupancy condition, but who are prepared to make a speculative purchase given the extent of the ‘discount’ to unconditional Market Value which the Asking Price normally reflects.</li> <li>• The marketing of an Agricultural Workers Dwelling solely for planning purposes, without any genuine intention on the part of the owner to sell, is disingenuous at the very least, and equivalent to property misdescription.</li> <li>• Furthermore, the wide misuse of marketing for planning purposes only can often generate a negative response from the market; potential prospective purchasers assuming that the marketing exercise is in fact a sham and thus not bothering to make enquiries about the property.</li> <li>• Finally, the ability to obtain mortgage finance for dwellings subject to Agricultural Occupancy Conditions has always been problematic. In the current adverse residential market conditions, with mortgage finance difficult to secure for most properties, the chances of a purchaser obtaining loan finance in respect of a property with an agricultural occupancy condition is considered to be remote.</li> </ul> <p>Alternative Method</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>An alternative method for establishing whether there is an essential need in the locality for the agricultural workers dwelling is by firstly addressing what is meant by both need and locality, and then analysing the full approved planning permissions for agricultural workers dwellings in the locality identified.</p> <p><b>Need</b></p> <p>It is necessary to distinguish evidence of continuing need for Agricultural Workers' Dwellings from evidence of continuing demand. In this context, at least, the words are not synonymous. Many factors may contribute towards the market demand for a particular property, but, it is the need for a dwelling that is relevant in the case of farm or forestry workers dwellings" (our emphasis). The number of planning applications received (for agricultural workers' dwellings) as a yardstick for gauging need is misguided. The number of such applications received is only indicative of demand. It is the number of such applications which are subsequently approved which may provide evidence of need.</p> <p><b>Locality</b></p> <p>In more rural parts of the Country the locality, for the purposes of an assessment, of a particular agricultural unit may be appropriately defined by reference to travelling distance or travelling time. However such a simple and straightforward measure is inappropriate in the more densely populated parts of the North West of England, where travelling distances between settlements are short.</p> <p>The locality, at its widest, varies according to the location of the subject property. A 1/100,000 Scale Plan can be used to define these boundaries, but they often include major roads, waterways and towns/cities. Any need for residential accommodation for a key agricultural worker on an agricultural unit located beyond identified settlements would not require an Agricultural Workers' Dwelling within the locality defined. Those settlements would provide a wide range of available house types and tenure capable of satisfying such accommodation need.</p> <p><b>Identifying need within the locality</b></p> <p>Evidence obtained from research of the Planning Registers of the relevant LPA's (who cover the identified locality) regarding planning applications for permanent agricultural workers' dwellings should be reviewed. Research of all applicable local planning authority's planning registers to identify the number, frequency and outcome of planning applications submitted for permanent Agricultural Workers' Dwellings over the past 10 years should be carried out. Analysis of the approved planning applications within the identified locality will provide evidence of need. This is the only one yardstick required for identifying need within the local agricultural sector.</p>
124	220	Chapter C - Policy C3 - Site W	<p>According to this plan the majority of access to the proposed area will be via Croston Road. This road is already extremely over stretched with long delays specially during the rush traffic hours. To add the traffic of another 1000 or more houses would be totally inappropriate and unsustainable. In addition the heavy traffic on this road is already presenting a dangerous prospect when it comes to not only car drivers but children and families having to cross the road in order to reach their school or the shops. It cannot be possible to improve the road safety to such a standard so that it would be acceptable in order to ensure health and safety, as well as a reasonable flow of traffic.</p>
125	221	Chapter G - Policy G1	<p>SR22 - Land north of Goose Green Farm, Much Hoole</p> <p>We are instructed by Nolan Redshaw to submit representations on the above document and a site which is edged and hatched in red on the attached plan.</p> <p>Please note that this site is Site Ref: SR22 plus some adjacent land which became available as part of a potential development plot late last year.</p> <p>The site was submitted to the Council at the earlier Call for Sites exercise but was 'filtered out' due to the fact that it is in the Green Belt and there had been a decision made by the Council not to take forward Green Belt sites. Notwithstanding this, it is respectfully suggested that the additional land has significantly improved the site's potential for development as it adjoins the established urban area and its development would now be far more logical than previously considered.</p> <p>Whilst it is appreciated that the Council's stance is that no Green Belt sites will be allocated for development, it is our professional view that this is one which would benefit from serious reconsideration as it not only adjoins the established urban area to the west, it links up with an area of land to the north which is proposed to be allocated for Village Development (Policy B2). For ease of reference Policy B2 reads as follows:  "Land on the periphery of Much Hoole, New Longton, Coupe Green and Mellor Brook is safeguarded to meet local needs as shown on the Proposals Map. It will only be released during the plan period for development (including local affordable housing, health care, community facilities or employment) which meets the following requirements:  a) The proposed development cannot be accommodated within the existing built-up area of the village, or this site is preferable for the use proposed. Evidence of this will be required;  b) The proposed development does not include market housing."</p> <p>Given the proposed allocation to the north of the site it would make sense for the site subject to these representations to be also allocated for 'Village Development'. This would create a site</p>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			which can provide for the future local needs of Much Hoole without forming an illogical extension to the established urban area.
126	222	Chapter D - Policy D1 - Site S	<p>We are instructed by Dorbcrest Homes Limited to produce and submit representations in relation to the above consultation document and the site which is shown edged and hatched in red on the attached plan.</p> <p>For ease of reference the site is referred to in the document as follows:  Site Name – Land off Brindle Road, Proposal Map Ref: S  Proposed Allocation - Housing  It has always been our argument that the site is ideal for housing development so it is gratifying to see that the Council has agreed and our client’s site has been included within the housing allocation off Brindle Road (Ref: S).</p> <p>Notwithstanding this, it has also been our argument that our client’s site does not rely on the surrounding land; is deliverable in the short-term without the need for any major infrastructure improvements; and its development would not conflict with the delivery of the wider site.  This matter was raised in representations submitted previously and is dealt with in the current document as follows:  “...given the infrastructure provision in the area required to facilitate the development of this site, the Council would not support individual plots coming forward on an “ad hoc” basis. The site should be comprehensively developed with a Masterplan produced.”</p> <p>The above is then reflected by the projection in the document that zero dwellings will be erected in Housing Allocation S within the period 2010-2016. However, our client’s site can deliver housing within that period without the need for major infrastructure provision as there is already an access from Cottage Gardens which our client has control over and can serve the development site.</p> <p>We view this as a discreet development site which is not reliant on any other land owners. Its development would not prejudice the development of the wider allocation and is therefore not seen to be ‘ad hoc’ or piecemeal development. It is also highly relevant that the landowner, our client, is a major house builder so the site is available and deliverable in the short-term. It was always the aim to have the site developed before 2016 so this could stifle its development unnecessarily.</p> <p>The Council is respectfully requested to review its decision and allow our client to develop the site in isolation for the following reasons:</p> <ul style="list-style-type: none"> <li>• It has an existing access point;</li> <li>• The site is owned by a major house builder;</li> <li>• Major infrastructure provision is not necessary;</li> <li>• The site is deliverable in the short-term;</li> <li>• Its development will not prejudice the development of the wider site;</li> <li>• It would not represent ‘ad hoc’ or piecemeal development.</li> </ul>
127	225	Chapter B - Policy B3 - South Rings Business Park	<p>We are instructed to submit this representation on behalf of our client, Mr J Sharples, being owner-occupier of the property known as Bannastres at Bank, Nook Lane, Cuerden, Bamber Bridge.</p> <p>Our clients’ property lies wholly within the area defined on the Proposals Map as the South Rings Business Park.</p> <p>Given that a significant part of the South Rings Business Park has already been developed, we consider that Policy B3, as currently drafted, is unsound as it is unnecessarily complicated and restrictive. Furthermore, the Policy, as worded, would jeopardise the future of our client’s existing business at Bannastres at Bank, which currently falls within the range of uses envisaged within the South Rings allocation.</p> <p>The wording of the policy should be simplified, in line with Policy B4, to read as follows:</p> <p>“Within the area defined on the Proposals Map at South Rings Business Park, Bamber Bridge, new development, re-development or change of use will be permitted to provide the following uses only:</p> <ul style="list-style-type: none"> <li>• Offices, non-food retail, employment, leisure, recreation and tourist facilities.”</li> </ul>
128	229	Chapter B - Policies B2 and D1	<p>Land off Swallow Field, Much Hoole</p> <p>Introduction  1.1. De Pol Associates are instructed to submit representations to the Site Allocations &amp; Development Management Policies DPD (SADMP) – Publication Version regarding land to the east of Swallow Field on the edge of Much Hoole, as shown edged in red on the attached plan.  1.2. Similar representations were submitted to the SADMP Preferred Options in December 2011, although these representations have been updated to take account of the NPPF and the Council’s response to the previous representations.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>1.3. The subject site is approximately 0.4 hectares and is designated in the SADMP as a Village Development opportunity under Policy B2. In summary it is contended that inadequate housing provision is made within the SADMP, both for the Borough as a whole and specifically within Much Hoole. It is also contended that the subject site is an appropriate location for market housing development. As such representations are submitted to Policies D1 'Allocation of Housing Sites' and B2 'Village Development'.</p> <p>Representations</p> <p>2.1. Policy D1 'Allocation of Housing Sites'</p> <p>Why Policy D1 is Unsound</p> <p>2.1.1. The policy is considered unsound on the following two grounds.</p> <ul style="list-style-type: none"> <li>• Insufficient land has been allocated for residential development in Policy D1 to maintain a ready and flexible supply of housing land to deliver enough new housing to meet the future requirements of the Borough and as such the Policy and DPD fails to meet the key objectives of the Core Strategy and National Policy.</li> <li>• The policy, along with Policy B2, would result in insufficient housing development opportunities within Much Hoole.</li> </ul> <p>Insufficient Housing Allocations</p> <p>2.1.2. The Core Strategy identifies a need for a minimum of 417 dwellings per annum within the Borough between 2010 and 2026, which equates to a minimum of 6,672 dwellings over this plan period, together with any previous under provision. This housing requirement is not however intended to be a ceiling to development and the clear emphasis in the National Planning Policy Framework is one of encouraging growth and ensuring adequate housing provision. Indeed one of the core land-use planning principles identified in the NPPF is making every effort to identify and meet the housing needs of an area and to respond positively to wider opportunities for growth.</p> <p>2.1.3. Sufficient housing supply should therefore be identified within Policy D1 of the SADMP to help ensure the sufficient delivery of a wide choice of homes. It is also important that the SADMP has sufficient flexibility within its identified housing supply to address the inevitable uncertainty that identified sites will not come forward at the rate envisaged. This is particularly the case in this instance as the identified housing supply in the SADMP is considered to be optimistic bearing in mind that it includes sites with very high anticipated dwelling yields, whilst the anticipated dwelling yield from many of the identified large development sites is also based on gross site areas, which is often different from the actual net development area and as such could also result in an overestimated dwelling yield.</p> <p>2.1.4. Table 2 of the SADMP indicates that circa 6,962 dwellings are anticipated in total from the proposed housing allocations in Policy D1, existing housing commitments, sites with a current planning applications and other small sites accounted for in the SHLAA. Whilst this exceeds the minimum housing requirement of the Core Strategy by 290 dwellings, it only equates to a 4% surplus and even if the suggested potential windfall allowance of 45 dwellings per annum is taken into account, which itself could involve an element of double counting, the identified housing supply is still insufficient to ensure adequate flexibility in the Plan. This is particularly the case bearing in mind the uncertainty as to whether the current identified housing supply will actually deliver the amount of housing being suggested.</p> <p>2.1.5. Accordingly, and unless additional land is allocated for housing, Policy D1 is considered unsound as it fails to comply with a key objective of the Core Strategy and National Planning Policy to provide sufficient flexibility in its housing supply to ensure adequate housing provision during the lifetime of the plan.</p> <p>Market Housing Allocations at Much Hoole</p> <p>2.1.6. Whilst Much Hoole is not identified in Core Strategy Policy 1 'Locating Growth' as a settlement where investment and growth is to be concentrated, both South Ribble Borough Council and Preston City Council acknowledge that the provision of some market housing development in the smaller villages does not conflict with Policy 1(f). In this regard, Policy D1 of the South Ribble SADMP includes a housing allocation at Hutton (49 dwellings – site N) and at Walmer Bridge (65 dwellings – site Y), which like Much Hoole are smaller villages subject to Core Strategy Policy 1(f) and in paragraphs 7.38 and 7.56 the SADMP confirms that the Council consider these allocations to be appropriate under the terms of Policy 1(f).</p> <p>2.1.7. Policy AD2 of Preston's published Site Allocations and Development Management Policies DPD also allows small scale residential development within smaller villages subject to compliance with criteria requiring the scheme to be in keeping with the character of the village, not adversely affecting residential amenities, not leading to an over concentration of non residential uses and not leading to an over intensification of the site. Preston CC must therefore be interpreting Core Strategy Policy 1(f) as allowing small scale residential development within the 'small villages'.</p> <p>2.1.8. Not only is the provision of some market housing in general compliance with Core Strategy Policy 1(f), but it is in fact necessary to help sustain services and create sustainable communities. NPPF paragraph 55 acknowledges that housing can enhance and maintain the vitality of rural communities and when assessing the SADMP housing allocations the Council's Rural Proofing Assessment specifically acknowledges that new housing in appropriate rural locations/settlements will help sustain services. It also highlights the need to achieve a balance between locating growth within the most sustainable urban areas whilst at the same time recognising the need for some housing development in rural areas. Furthermore, in the Schedule of Responses to the Preferred Options Version, the Council's responses to representations relating to proposed housing allocation 'N' at Hutton includes :</p> <p>"New housing should be located in a range of locations across the Borough, to give people choice on where they wish to live. Some development is necessary in rural locations, to ensure the vitality and viability of these areas." (Chapter D, Policy D1, Site N, Resp Ref 62)</p> <p>"There is a Borough wide need for housing, that should be spread proportionally across the Borough.....New housing should be located in a range of locations – not everyone wants to live close to their place of work." (Chapter D, Policy D1, Site N, Resp Ref 223)</p> <p>"The Local Plan is now out of date and is being replaced. The Council must identify new sites for residential development.....There is a need for new housing across the Borough as a whole, and each area should take some development in order to help the Borough meet its housing requirements" (Chapter D, Policy D1, Site N, Resp Ref 10)</p>

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			<p>2.1.9. It is also noted from their response to other representations that the Council acknowledge that:  “Housing growth is always needed to sustain existing services, and allow them to grow.  Housing development is also needed to provide monies for infrastructure and service improvements in the area.” (Chapter D, Policy D1, Site Q, Resp Ref 5)</p> <p>2.1.10. Indeed the justification text in the SADMP which supports the allocation of site ‘N’ at Hutton states:  “Some limited new development in the village is important to maintain its viability and support and maintain the services it provides.” (SADMP paragraph 7.39)</p> <p>2.1.11. It is therefore clearly acknowledged by the Council that some market housing development within the smaller villages is necessary to maintain existing services, provide adequate choices for people to live and to maintain the viability and vitality of rural villages. Furthermore it is clearly accepted by the Council that the provision of market housing at such villages, particularly small scale development, does not conflict with the spatial policies of the Core Strategy.</p> <p>2.1.12. Like Hutton and Walmer Bridge, Much Hoole is a village where provision should be made for market housing development over the lifetime of the plan. The village is an established residential community and has a number of local services and facilities, including a local shop, restaurants, public houses, recreational facilities, village hall, mobile library, primary school, church and business park. Furthermore in 2005 the Council commissioned Beacon Research to undertake a Housing Needs Survey for Leyland, Longton, Little Hoole and Much Hoole. This concluded that there was a need for between 82 and 118 dwellings in Much Hoole between 2005 and 2010. However, the Council’s Housing Land Position Statement 2012 confirms that there were just 44 dwellings built in the village during this period. Furthermore only 3 dwellings have been built in Much Hoole in the last 3 years and there are just 3 dwellings with extant planning permissions in the village. It is also noted that SADMP Policy B2 identifies 4 villages, one of which is Much Hoole, where development accommodating local needs is required in order to maintain their vibrancy.</p> <p>2.1.13. When considering the appropriateness of providing for some development at Much Hoole it is also relevant to note that sustainable development lies at the heart of the NPPF, with paragraph 14 stating that for plan-making this means positively seeking opportunities to meet the development needs of the area and for Local Plans to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless 1) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole; or 2) specific policies in the NPPF indicate development should be restricted.</p> <p>2.1.14. The clear emphasis in the NPPF is therefore one of encouraging growth and ensuring adequate flexibility to meet housing needs, except where there are significant adverse impacts which outweigh the benefits. As previously highlighted the housing requirement set out in the Core Strategy is not intended to be a ceiling to development and the provision of some housing opportunities within Much Hoole is an integral part in maintaining existing services, providing adequate choices for people to live and maintaining the viability and vitality of the village. As highlighted later in this representation there are also potential housing allocations at Much Hoole which would not have adverse impacts that would significantly and demonstrably outweigh these benefits, or where specific policies in the NPPF suggest that development should be restricted.</p> <p>2.1.15. Notwithstanding the above, Policy D1 does not allocate any land for housing development at Much Hoole, despite doing so for Hutton and Walmer Bridge. Furthermore, and as acknowledged in SADMP Policy B2, Much Hoole is tightly constrained and has limited development opportunities within the current urban area for housing development, whilst the only development opportunities identified in the SHLAA are the Village Development designations where draft Policy B2 of the SADMP specifically precludes market housing.</p> <p>2.1.16. Accordingly, Policy D1 is unsound as it fails to comply with a key objective of National Planning Policy to provide sufficient flexibility in its housing supply to ensure adequate housing provision within the Borough during the lifetime of the plan and also fails to make adequate provision for housing development within Much Hoole.</p> <p>Suitability of Subject Site For Housing Allocation</p> <p>2.1.17. For reasons stated previously some housing provision should be made within Much Hoole and for the following reasons it is contended that the subject site would be a suitable housing allocation to meet these needs.</p> <ul style="list-style-type: none"> <li>• Policy B2 of the SADMP and the SHLAA indicate that Much Hoole is tightly constrained and that there are limited development opportunities within the existing defined urban area. The Council also confirm in their Schedule of Responses to the Preferred Options Version that the Borough’s annual housing requirement over the plan period cannot be met using existing development sites and brownfield land only, with some greenfield land therefore being needed (Chapter D, Policy D1, Site P, Resp Ref 72).</li> <li>• The subject site is already designated in the SADMP as a Village Development opportunity and as such is clearly considered suitable for development.</li> <li>• The site lends itself particularly well to a residential development bearing in mind that it is not only adjacent to existing housing but would also be effectively extending an existing residential street. The site is well connected with the existing residential community of Much Hoole, including the shops and services within the village and public transport links. There are also no neighbouring noise sources or uses which would be incompatible with housing and prevent satisfactory residential amenities for future residents being achieved. There are no known site constraints which would preclude a satisfactory residential development of the site.</li> <li>• The site is suitable, available and deliverable. In this regard the site is available now as it is effectively undeveloped and has no known physical constraints which would preclude the site from being developed for housing. The site is suitable for reasons previously highlighted. With regards to achievability, given the size and nature of the site, together with the absence of known physical constraints, there is more than a reasonable prospect of housing being delivered on the site.</li> </ul> <p>2.1.18. The Council’s stated response for not allocating the site for housing, as set out in their Schedule of Responses to the Preferred Options Version, Chapter D, Policy D1, Resp Ref 164, is as follows:  “The Council has engaged with representatives of the development industry to update the SHLAA in February 2012, and a total of 79 sites are shown in its latest update of the SHLAA. Further sites have been brought forward for inclusion in the DPD: 19 new sites of 0.4ha or over are allocated for housing development in Table 2 of the DPD, and summarised in Policy D1. The Council’s view is that there are sufficient deliverable sites to provide an adequate and continuous supply of housing land to meet housing requirements. Development at Much Hoole is restricted by the wording of Policy B2: Village Development.”</p> <p>2.1.19. Firstly, and for reasons previously stated, it is not considered that the SADMP makes adequate provision for housing development within the Borough as a whole, nor does it make</p>

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			<p>adequate provision for housing within Much Hoole itself. Indeed the Council do not appear to acknowledge the need for housing in Much Hoole, nor do they provide any justification as to why Much Hoole should be treated differently to Hutton and Walmer Bridge in this regard, where the Council acknowledge that there is a need for housing allocations in order to maintain existing services, provide adequate choices for people to live and to maintain the viability and vitality of these villages.</p> <p>2.1.20. Secondly, and for the following reasons, the site's current allocation as a Local Needs site in the adopted Local Plan and its Village Development designation in the SADMP is insufficient justification to rule out its allocation for housing.</p> <ul style="list-style-type: none"> <li>The adopted Local Plan has come to the end of its life and all former development allocations should be reconsidered to assess whether they could be designated for alternative uses. This is acknowledged by the Council in relation to proposed housing allocation 'P', where the Council's response to an objection to this allocation is as follows: "Whilst the land is currently allocated for safeguarded land in the Local Plan, the Local Plan has come to the end of its life and therefore must be replaced. The Council has a duty to review all sites within the Local Plan, and to identify enough land to meet its housing and employment requirements." (Schedule of Responses to the Preferred Options Version, Chapter D, Policy D1, Site P, Resp Ref 45)</li> <li>There is no evidence provided by the Council to suggest that the designation of the subject site for housing development would significantly undermine the objectives of draft SADMP Policy B2 being delivered. Indeed the subject site is just 0.4 ha of a larger Village Development designation and there are also two other Village Development designations at Much Hoole. Furthermore, a housing allocation would as a result of other LDF policies secure some affordable housing which would comply with Policy B2 objectives.</li> </ul> <p>2.1.21. In summary, if it is viewed that some sites should be allocated for housing within Much Hoole then the subject is an appropriate site for such an allocation and the Council have failed to provide any sound justification as to why this is not the case.</p> <p>Requested Change</p> <p>2.1.22. It is requested that the subject site be specifically allocated for housing in Policy D1.</p> <p>2.2. Policy B2 'Village Development'</p> <p>Why Policy B2 is Unsound</p> <p>2.2.1. Policy B2 acknowledges that the villages of Much Hoole, New Longton, Coupe Green and Mellor Brook need some development to accommodate local needs in order to maintain their vibrancy. Furthermore, and as previously highlighted in the representation to Policy D1, the Council acknowledges that market housing is necessary in smaller villages to maintain existing services, provide adequate choices for people to live and to maintain the viability and vitality of the rural villages.</p> <p>2.2.2. The SADMP designates land on the edge of these identified villages to meet local needs such as affordable housing, health care, community facilities and employment (Policy B2 Village Development designations) and it is contended that these sites should also be allowed to meet needs for market housing. This is particularly the case given that Policy D1 of the SADMP does not currently allocate any land for housing development at these settlements, whilst the only development opportunities identified in the SHLAA within these villages are these Village Development designations.</p> <p>2.2.3. The Council's justification for precluding market housing, as set out in their Schedule of Responses to the Preferred Options Version, is as follows: "These sites are reserved for Local Needs that cannot be met elsewhere. In most cases, there is land identified elsewhere for market housing. The Council would not support any market housing on these sites, as it is likely that this would come forward at the cost of an identified need in the village" (Chapter B, Policy B2, Resp Ref 164)</p> <p>2.2.4. Firstly, the justification text to Policy B2 acknowledges that the reason for these designations is the fact that these identified settlements are tightly constrained and that there are limited development opportunities. Indeed the only potential housing sites identified in the SHLAA within these settlements are the Village Development sites. Furthermore, SADMP Policy D1 does not designate any sites for market housing in these settlements. Accordingly the SADMP does not identify sites elsewhere for market housing. In any event Policy B2 is self policing in this respect as it only allows the development of the land where the proposed development cannot be accommodated within the existing built-up area of the village, or the site is preferable for the use proposed.</p> <p>2.2.5. Secondly, there is no reason why an appropriately worded policy would result in market housing coming forward at the cost of other identified village needs. In fact allowing market housing can facilitate the provision of affordable housing, health care, community facilities or employment uses which would otherwise be unviable. The NPPF, at paragraph 54, also requires local planning authorities to consider whether allowing some market housing would facilitate the provision of significant additional affordable housing.</p> <p>2.2.6. Accordingly the wording of Policy B2, which specifically precludes market housing, is considered unsound as it will undermine the ability to provide necessary market housing within villages such as Much Hoole, whilst also precluding the opportunity for market housing to act as a facilitator to providing development which meets other local needs.</p> <p>Requested Change</p> <p>2.2.7. Policy B2 is amended as follows : "Land on the periphery of Much Hoole, New Longton, Coupe Green and Mellor Brook is safeguarded to meet local needs as shown on the Proposals Map. It will only be released during the Plan period for development (including local affordable housing, health care, community facilities or employment) which meets the following requirements: a) The proposed development cannot be accommodated within the existing built-up area of the village, or this site is preferable for the use proposed. Evidence of this will be required; and b) The proposed development does not include market housing. Market housing will only be permitted when it does not significantly undermine the ability to provide appropriate levels of affordable housing, health care, community facilities, employment or other local needs within the village; or would be facilitating development which meets affordable housing, health care, community facilities, employment or other local needs.</p>
128	232	Chapter B - Policies B2 and D1	<p>Land South of Liverpool Old Road, Much Hoole</p> <p>Introduction</p>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>1.1. De Pol Associates are instructed to submit representations to the Site Allocations &amp; Development Management Policies DPD (SADMP) – Publication Version regarding land south of Liverpool Old Road and west of the recreational ground, on the edge of Much Hoole (shown edged in red on the attached plan).</p> <p>1.2. Similar representations were submitted to the SADMP Preferred Options in December 2011, although these representations have been updated to take account of the NPPF and the Council’s response to the previous representations.</p> <p>1.3. The subject site is approximately 1.9 hectares and is designated in the SADMP as a Village Development opportunity under Policy B2. In summary it is contended that inadequate housing provision is made within the SADMP, both for the Borough as a whole and specifically within Much Hoole. It is also contended that the subject site is an appropriate location for market housing development. As such representations are submitted to Policies D1 ‘Allocation of Housing Sites’ and B2 ‘Village Development’.</p> <p>Representations</p> <p>2.1. Policy D1 ‘Allocation of Housing Sites’</p> <p>Why Policy D1 is Unsound</p> <p>2.1.1. The policy is considered unsound on the following two grounds.</p> <ul style="list-style-type: none"> <li>• Insufficient land has been allocated for residential development in Policy D1 to maintain a ready and flexible supply of housing land to deliver enough new housing to meet the future requirements of the Borough and as such the Policy and DPD fails to meet the key objectives of the Core Strategy and National Policy.</li> <li>• The policy, along with Policy B2, would result in insufficient housing development opportunities within Much Hoole.</li> </ul> <p>Insufficient Housing Allocations</p> <p>2.1.2. The Core Strategy identifies a need for a minimum of 417 dwellings per annum within the Borough between 2010 and 2026, which equates to a minimum of 6,672 dwellings over this plan period, together with any previous under provision. This housing requirement is not however intended to be a ceiling to development and the clear emphasis in the National Planning Policy Framework is one of encouraging growth and ensuring adequate housing provision. Indeed one of the core land-use planning principles identified in the NPPF is making every effort to identify and meet the housing needs of an area and to respond positively to wider opportunities for growth.</p> <p>2.1.3. Sufficient housing supply should therefore be identified within Policy D1 of the SADMP to help ensure the sufficient delivery of a wide choice of homes. It is also important that the SADMP has sufficient flexibility within its identified housing supply to address the inevitable uncertainty that identified sites will not come forward at the rate envisaged. This is particularly the case in this instance as the identified housing supply in the SADMP is considered to be optimistic bearing in mind that it includes sites with very high anticipated dwelling yields, whilst the anticipated dwelling yield from many of the identified large development sites is also based on gross site areas, which is often different from the actual net development area and as such could also result in an overestimated dwelling yield.</p> <p>2.1.4. Table 2 of the SADMP indicates that circa 6,962 dwellings are anticipated in total from the proposed housing allocations in Policy D1, existing housing commitments, sites with a current planning applications and other small sites accounted for in the SHLAA. Whilst this exceeds the minimum housing requirement of the Core Strategy by 290 dwellings, it only equates to a 4% surplus and even if the suggested potential windfall allowance of 45 dwellings per annum is taken into account, which itself could involve an element of double counting, the identified housing supply is still insufficient to ensure adequate flexibility in the Plan. This is particularly the case bearing in mind the uncertainty as to whether the current identified housing supply will actually deliver the amount of housing being suggested.</p> <p>2.1.5. Accordingly, and unless additional land is allocated for housing, Policy D1 is considered unsound as it fails to comply with a key objective of the Core Strategy and National Planning Policy to provide sufficient flexibility in its housing supply to ensure adequate housing provision during the lifetime of the plan.</p> <p>Market Housing Allocations at Much Hoole</p> <p>2.1.6. Whilst Much Hoole is not identified in Core Strategy Policy 1 ‘Locating Growth’ as a settlement where investment and growth is to be concentrated, both South Ribble Borough Council and Preston City Council acknowledge that the provision of some market housing development in the smaller villages does not conflict with Policy 1(f). In this regard, Policy D1 of the South Ribble SADMP includes a housing allocation at Hutton (49 dwellings – site N) and at Walmer Bridge (65 dwellings – site Y), which like Much Hoole are smaller villages subject to Core Strategy Policy 1(f) and in paragraphs 7.38 and 7.56 the SADMP confirms that the Council consider these allocations to be appropriate under the terms of Policy 1(f).</p> <p>2.1.7. Policy AD2 of Preston’s published Site Allocations and Development Management Policies DPD also allows small scale residential development within smaller villages subject to compliance with criteria requiring the scheme to be in keeping with the character of the village, not adversely affecting residential amenities, not leading to an over concentration of non residential uses and not leading to an over intensification of the site. Preston CC must therefore be interpreting Core Strategy Policy 1(f) as allowing small scale residential development within the ‘small villages’.</p> <p>2.1.8. Not only is the provision of some market housing in general compliance with Core Strategy Policy 1(f), but it is in fact necessary to help sustain services and create sustainable communities. NPPF paragraph 55 acknowledges that housing can enhance and maintain the vitality of rural communities and when assessing the SADMP housing allocations the Council’s Rural Proofing Assessment specifically acknowledges that new housing in appropriate rural locations/settlements will help sustain services. It also highlights the need to achieve a balance between locating growth within the most sustainable urban areas whilst at the same time recognising the need for some housing development in rural areas. Furthermore, in the Schedule of Responses to the Preferred Options Version, the Council’s responses to representations relating to proposed housing allocation ‘N’ at Hutton includes :  “New housing should be located in a range of locations across the Borough, to give people choice on where they wish to live. Some development is necessary in rural locations, to ensure the vitality and viability of these areas.” (Chapter D, Policy D1, Site N, Resp</p>



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			<p>Ref 62)</p> <p>“There is a Borough wide need for housing, that should be spread proportionally across the Borough.....New housing should be located in a range of locations – not everyone wants to live close to their place of work.” (Chapter D, Policy D1, Site N, Resp Ref 223)</p> <p>“The Local Plan is now out of date and is being replaced. The Council must identify new sites for residential development.....There is a need for new housing across the Borough as a whole, and each area should take some development in order to help the Borough meet its housing requirements” (Chapter D, Policy D1, Site N, Resp Ref 10)</p> <p>2.1.9. It is also noted from their response to other representations that the Council acknowledge that:</p> <p>“Housing growth is always needed to sustain existing services, and allow them to grow.</p> <p>Housing development is also needed to provide monies for infrastructure and service improvements in the area.” (Chapter D, Policy D1, Site Q, Resp Ref 5)</p> <p>2.1.10. Indeed the justification text in the SADMP which supports the allocation of site ‘N’ at Hutton states:</p> <p>“Some limited new development in the village is important to maintain its viability and support and maintain the services it provides.” (SADMP paragraph 7.39)</p> <p>2.1.11. It is therefore clearly acknowledged by the Council that some market housing development within the smaller villages is necessary to maintain existing services, provide adequate choices for people to live and to maintain the viability and vitality of rural villages. Furthermore it is clearly accepted by the Council that the provision of market housing at such villages does not conflict with the spatial policies of the Core Strategy.</p> <p>2.1.12. Like Hutton and Walmer Bridge, Much Hoole is a village where provision should be made for market housing development over the lifetime of the plan. The village is an established residential community and has a number of local services and facilities, including a local shop, restaurants, public houses, recreational facilities, village hall, mobile library, primary school, church and business park. Furthermore in 2005 the Council commissioned Beacon Research to undertake a Housing Needs Survey for Leyland, Longton, Little Hoole and Much Hoole. This concluded that there was a need for between 82 and 118 dwellings in Much Hoole between 2005 and 2010. However, the Council’s Housing Land Position Statement 2012 confirms that there were just 44 dwellings built in the village during this period. Furthermore only 3 dwellings have been built in Much Hoole in the last 3 years and there are just 3 dwellings with extant planning permissions in the village. It is also noted that SADMP Policy B2 identifies 4 villages, one of which is Much Hoole, where development accommodating local needs is required in order to maintain their vibrancy.</p> <p>2.1.13. When considering the appropriateness of providing for some development at Much Hoole it is also relevant to note that sustainable development lies at the heart of the NPPF, with paragraph 14 stating that for plan-making this means positively seeking opportunities to meet the development needs of the area and for Local Plans to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless 1) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole; or 2) specific policies in the NPPF indicate development should be restricted.</p> <p>2.1.14. The clear emphasis in the NPPF is therefore one of encouraging growth and ensuring adequate flexibility to meet housing needs, except where there are significant adverse impacts which outweigh the benefits. As previously highlighted the housing requirement set out in the Core Strategy is not intended to be a ceiling to development and the provision of some housing opportunities within Much Hoole is an integral part in maintaining existing services, providing adequate choices for people to live and maintaining the viability and vitality of the village. As highlighted later in this representation there are also potential housing allocations at Much Hoole which would not have adverse impacts that would significantly and demonstrably outweigh these benefits, or where specific policies in the NPPF suggest that development should be restricted.</p> <p>2.1.15. Notwithstanding the above, Policy D1 does not allocate any land for housing development at Much Hoole, despite doing so for Hutton and Walmer Bridge. Furthermore, and as acknowledged in SADMP Policy B2, Much Hoole is tightly constrained and has limited development opportunities within the current urban area for housing development, whilst the only development opportunities identified in the SHLAA are the Village Development designations where draft Policy B2 of the SADMP specifically precludes market housing.</p> <p>2.1.16. Accordingly, Policy D1 is unsound as it fails to comply with a key objective of National Planning Policy to provide sufficient flexibility in its housing supply to ensure adequate housing provision within the Borough during the lifetime of the plan and also fails to make adequate provision for housing development within Much Hoole.</p> <p>Suitability of Subject Site For Housing Allocation</p> <p>2.1.17. For reasons stated previously some housing provision should be made within Much Hoole and for the following reasons it is contended that the subject site would be a suitable housing allocation to meet these needs.</p> <ul style="list-style-type: none"> <li>• Policy B2 of the SADMP and the SHLAA indicate that Much Hoole is tightly constrained and that there are limited development opportunities within the existing defined urban area. The Council also confirm in their Schedule of Responses to the Preferred Options Version that the Borough’s annual housing requirement over the plan period cannot be met using existing development sites and brownfield land only, with some greenfield land therefore being needed (Chapter D, Policy D1, Site P, Resp Ref 72).</li> <li>• The subject site is already designated in the SADMP as a Village Development opportunity and as such is clearly considered suitable for development.</li> <li>• The site is adjacent to existing housing development and is well connected with the existing residential community of Much Hoole, including the shops and services within the village and public transport links. There are also no neighbouring noise sources or uses which would be incompatible with housing and prevent satisfactory residential amenities for future residents being achieved. There are no known site constraints which would preclude a satisfactory residential development of the site.</li> <li>• The site is suitable, available and deliverable. In this regard the site is available now as it is effectively undeveloped and has no known physical constraints which would preclude the site from being developed for housing. The site is suitable for reasons previously highlighted. With regards to achievability, given the size and nature of the site, together with the absence of known physical constraints, there is more than a reasonable prospect of housing being delivered on the site.</li> </ul> <p>2.1.18. The Council’s stated response for not allocating the site for housing, as set out in their Schedule of Responses to the Preferred Options Version, Chapter D, Policy D1, Resp Ref 163, is as follows:</p>

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			<p>“The Council has engaged with representatives of the development industry to update the SHLAA in February 2012, and a total of 79 sites are shown in its latest update of the SHLAA. Further sites have been brought forward for inclusion in the DPD: 19 new sites of 0.4ha or over are allocated for housing development in Table 2 of the DPD, and summarised in Policy D1. The Council’s view is that there are sufficient deliverable sites to provide an adequate and continuous supply of housing land to meet housing requirements. Development at Much Hoole is restricted by the wording of Policy B2: Village Development.”</p> <p>2.1.19. Firstly, and for reasons previously stated, it is not considered that the SADMP makes adequate provision for housing development within the Borough as a whole, nor does it make adequate provision for housing within Much Hoole itself. Indeed the Council do not appear to acknowledge the need for housing in Much Hoole, nor do they provide any justification as to why Much Hoole should be treated differently to Hutton and Walmer Bridge in this regard, where the Council acknowledge that there is a need for housing allocations in order to maintain existing services, provide adequate choices for people to live and to maintain the viability and vitality of these villages.</p> <p>2.1.20. Secondly, and for the following reasons, the site’s current allocation as a Local Needs site in the adopted Local Plan and its Village Development designation in the SADMP is insufficient justification to rule out its allocation for housing.</p> <ul style="list-style-type: none"> <li>• The adopted Local Plan has come to the end of its life and all former development allocations should be reconsidered to assess whether they could be designated for alternative uses. This is acknowledged by the Council in relation to proposed housing allocation ‘P’, where the Council’s response to an objection to this allocation is as follows: “Whilst the land is currently allocated for safeguarded land in the Local Plan, the Local Plan has come to the end of its life and therefore must be replaced. The Council has a duty to review all sites within the Local Plan, and to identify enough land to meet its housing and employment requirements.” (Schedule of Responses to the Preferred Options Version, Chapter D, Policy D1, Site P, Resp Ref 45)</li> <li>• There is no evidence provided by the Council to suggest that the designation of the subject site for housing development would significantly undermine the objectives of draft SADMP Policy B2 being delivered. Indeed there are two other Village Development designations at Much Hoole. Furthermore, a housing allocation would as a result of other LDF policies secure some affordable housing which would comply with Policy B2 objectives.</li> </ul> <p>2.1.21. In summary, if it is viewed that some sites should be allocated for housing within Much Hoole then the subject is an appropriate site for such an allocation and the Council have failed to provide any sound justification as to why this is not the case.</p> <p>Requested Change</p> <p>2.1.22. It is requested that the subject site be specifically allocated for housing in Policy D1.</p> <p>2.2. Policy B2 ‘Village Development’ Why Policy B2 is Unsound</p> <p>2.2.1. Policy B2 acknowledges that the villages of Much Hoole, New Longton, Coupe Green and Mellor Brook need some development to accommodate local needs in order to maintain their vibrancy. Furthermore, and as previously highlighted in the representation to Policy D1, the Council acknowledges that market housing is necessary in smaller villages to maintain existing services, provide adequate choices for people to live and to maintain the viability and vitality of the rural villages.</p> <p>2.2.2. The SADMP designates land on the edge of these identified villages to meet local needs such as affordable housing, health care, community facilities and employment (Policy B2 Village Development designations) and it is contended that these sites should also be allowed to meet needs for market housing. This is particularly the case given that Policy D1 of the SADMP does not currently allocate any land for housing development at these settlements, whilst the only development opportunities identified in the SHLAA within these villages are these Village Development designations.</p> <p>2.2.3. The Council’s justification for precluding market housing, as set out in their Schedule of Responses to the Preferred Options Version, is as follows: “These sites are reserved for Local Needs that cannot be met elsewhere. In most cases, there is land identified elsewhere for market housing. The Council would not support any market housing on these sites, as it is likely that this would come forward at the cost of an identified need in the village” (Chapter B, Policy B2, Resp Ref 164)</p> <p>2.2.4. Firstly, the justification text to Policy B2 acknowledges that the reason for these designations is the fact that these identified settlements are tightly constrained and that there are limited development opportunities. Indeed the only potential housing sites identified in the SHLAA within these settlements are the Village Development sites. Furthermore, SADMP Policy D1 does not designate any sites for market housing in these settlements. Accordingly the SADMP does not identify sites elsewhere for market housing. In any event Policy B2 is self policing in this respect as it only allows the development of the land where the proposed development cannot be accommodated within the existing built-up area of the village, or the site is preferable for the use proposed.</p> <p>2.2.5. Secondly, there is no reason why an appropriately worded policy would result in market housing coming forward at the cost of other identified village needs. In fact allowing market housing can facilitate the provision of affordable housing, health care, community facilities or employment uses which would otherwise be unviable. The NPPF, at paragraph 54, also requires local planning authorities to consider whether allowing some market housing would facilitate the provision of significant additional affordable housing.</p> <p>2.2.6. Accordingly the wording of Policy B2, which specifically precludes market housing, is considered unsound as it will undermine the ability to provide necessary market housing within villages such as Much Hoole, whilst also precluding the opportunity for market housing to act as a facilitator to providing development which meets other local needs.</p> <p>Requested Change</p> <p>2.2.7. Policy B2 is amended as follows : “Land on the periphery of Much Hoole, New Longton, Coupe Green and Mellor Brook is safeguarded to meet local needs as shown on the Proposals Map. It will only be released during the Plan period for development (including local affordable housing, health care, community facilities or employment) which meets the following requirements:</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>a) The proposed development cannot be accommodated within the existing built-up area of the village, or this site is preferable for the use proposed. Evidence of this will be required; and</p> <p>b) The proposed development does not include market housing. Market housing will only be permitted when it does not significantly undermine the ability to provide appropriate levels of affordable housing, health care, community facilities, employment or other local needs within the village; or would be facilitating development which meets affordable housing, health care, community facilities, employment or other local needs.</p>
129	230	Chapter C - Policy C2 - Moss Side Test Track	<p>I am XXXXX and I reside with my family at the above address on Longmeanygate Leyland. I have done for the past 8 years. I have lived in Leyland for the past 40 years, and am well aware of local issues and developments. I am a local employer and I am interested in the future development of the town.</p> <p><b>SUMMARY</b></p> <p>I have watched the proposals to develop Moss Side Test Track grow and gather momentum for a number of years and it is no surprise to myself or indeed all other local residents in and around Midge Hall that the proposals to develop the site for building and additional industrial use are now coming to fruition.</p> <p>With this in mind, the majority of my neighbours and indeed myself are sadly resigned to the fact that a wonderfully preserved and protected wild life haven and reserve will not be preserved much longer as a place of local beauty for the public of Leyland to enjoy, but instead will be given over to industrial development and house building.</p> <p>However, I do not believe the local residents should be abandoned or indeed ignored, for there are many issues and problems yet to be fully addressed. The infrastructure of this locality is in a fragile state. Local road systems, drainage, Sewage removal, Local Rail Links and Recreational Amenities and the maintenance of a green environment and eco-structure are currently to say the least – poor! The lack of Medical Provision, Dentists and Schooling seems in no way to have been addressed so far in the Planning Process.</p> <p>The Council has made much reference to its comprehensive consultation process with local residents, but there has been little indication that many have in fact been made aware of the magnitude of the Site Allocation and Development Plan for the next 15 years. Indeed, at the recent meeting of Cabinet on Wednesday 13th. June 2012, the maximum number of respondents to the plans for the whole of South Ribble was a mere 227. I believe this to indicate that it was not that residents had no concerns of the proposed developments, but they have not been made sufficiently aware of the disruption to come! That same report had the effrontery to say in writing – “Overall there were no significant issues that emerged from the consultation process....”</p> <p>I will however now restrict myself to a single area of concern – Access and Egress to and from the proposed site, particularly in relation to Longmeanygate.</p> <p><b>Local Feeling and knowledge of the Area</b></p> <p>It is essential in such a large development to carry the hearts and minds of the people with the developers. It should also be a goal of the developers to ensure those who have been in residence in the area are given the greatest of consideration and wherever possible. Their welfare should be paramount even above the preparation of the area for new residents.</p> <p>Also, cognisance should be given to those who know the development area and its infrastructure well. Taking account of those who have extensive knowledge of the area could pay dividends to the planners and reap benefits for those coming into the area afresh.</p> <p><b>The Process</b></p> <ul style="list-style-type: none"> <li>• On 2nd. June 2010, a meeting took place to launch the Development Brief for the Leyland Test Track and to seek approval for it.</li> <li>• On page 3 of the briefing paper to that meeting, prepared by one Jonny Pennick, it was clearly stated that access to the residential area of the site would be via Titan Way from the Aston Way roundabout. Throughout that meeting, the last of the Planning Committee meetings on the subject, there was no other mention of access points to the site. No maps were made available to the public prior to or during the meeting as there was apparently a computer malfunction.</li> <li>• Immediately following the meeting however, maps were made available which clearly showed two access points to the site, from Longmeanygate. They were labelled “Proposed cul-de-sacs including emergency access links.” This matter has not been discussed publically until a Public Meeting held recently on Thursday 2nd August 2012, to discuss this very issue and sponsored by County Councillor Michael Green. There were representatives present from South Ribble Planning as well as LCC Highways and Transport.</li> </ul> <p><b>Public Safety and Road Traffic Issues</b></p> <p>The following issues, which were discussed openly at that meeting, are the substance of my representations:</p> <ul style="list-style-type: none"> <li>• The proposal to site two access points on Longmeanygate is flawed, without consideration or discussion, or recourse to research, a traffic strategy or traffic plan. To those who know the area, the points currently identified could not possibly be in a more dangerous position. Both are situated on corners with restricted view. Longmeanygate is little more than a country lane which time has eroded into a “Rat Run” for people wishing to avoid the congestion of Leyland’s major trunk roads.</li> </ul>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<ul style="list-style-type: none"> <li>• Longmeanygate is a widely acknowledged busy vehicular route. There is pedestrian traffic – particularly to the local Pub on Midge Hall Lane, but there are no pavements at either of these points. People on bicycles and horses also dice with death’ literally’ on this crowded thoroughfare, which has a National Speed limit. There have been numerous attempts by local residents to address this, but without avail.</li> <li>• The Development Brief of June 2010 Para. 5.54 demands “A full Transport Assessment in accordance with the Department of Transport’s Guidance on Transport Assessment.” Such assessment was to address the increase in traffic; an access strategy “... to allow the development proposal to seamlessly integrate within and suitably connect to the surrounding area.” I have found no evidence of such a report being available. The LCC representative at the meeting of 2nd August was unaware of such an assessment being carried out and could provide no reasoned purpose as to why the two current access points have been chosen.</li> <li>• The proposal for research to restrict accident statistics to the last 5 years is again flawed at best and misleading at worst. I was not able to gain information from the LCC representative about what information on road collisions over the last 5 years had assisted in identifying the two access points, but have personally been provided with information that records show 13 injury accidents on Longmeanygate over that period, 1 considered serious. The 5 year rule conveniently allows two fatal accidents on this road, one at almost the exact point where one of the access points is proposed, to be excluded from any report, if indeed any such report exists.</li> <li>• It is quite clear to all who reside in this area there is no strategy or reasonable plan in choosing the points on Longmeanygate so far identified, other than they are the only two plots of land owned by the Council. Despite their being completely unsatisfactory for purpose, they were chosen for convenience and financial reasons, not safety.</li> </ul> <p>Planning Policy and Guidance</p> <p>In their own words, the Council are committed to being: “Clean – Green – Safe.” Decimating these two well established and mature wooded and green areas for the purpose at hand flies in the face of the Council’s own planning policies as laid out in the Development Brief:</p> <p>5.25 “The Developer should ....avoid loss of or damage to the sites environmental assets.”</p> <p>5.42 Refers to connections to footways on Longmeanygate. At the proposed access points, there are no such footways.</p> <p>Appendix E Planning Policy Framework (PP)</p> <p>PPG13 Promote sustainable transport choices.....reduce the need to travel by car.....promote cycling and walking – This would not be a safe option at the points currently identified.</p> <p>Regional Spatial Strategy</p> <p>RSS DP7 “...the environmental quality of the region should be protected and enhanced...”</p> <p>South Ribble Council Local Plan</p> <p>SRLP ENV4 “...traditional landscape features which are of importance for wild flora and fauna will be protected against any development which may destroy or adversely affect them...”</p> <p>SRLP OSR4 “...areas of open space will be retained...”</p> <p>SRLP T7 “States that development will be permitted provided that road safety and the convenient movement of all highway users including cyclists, pedestrians and public transport operators is not prejudiced.”</p> <p>SRLP QD1 “...planning permission will be granted for development, provided...the development would not prejudice highway safety, including pedestrians...”</p> <p>SRLP QD7 “...healthy trees and other important landscape features are retained and incorporated within the development.”</p> <p>SOLUTION / ALTERNATIVE</p> <p>There is however a solution to this one element of the Development Plan/Brief which local residents believe to be a realistic, practical and cost effective alternative. Having consulted widely and extensively with others in the area, there is one proposal that would, in the opinion of most of the local residents alleviate the currently disastrous proposals for access on Longmeanygate and a second to help relieve congestion on Dunkirk Lane and provide direct access to Schleswig Way.</p>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>Longmeanygate</p> <p>Between the two currently identified access points lies Midge Hall Lane. This is currently something of a pinch point as traffic passes along Longmeanygate but can turn here towards Liverpool. This road is widely used already by heavy commercial vehicles and articulated vehicles and traffic regularly comes to a standstill. Opposite Midge Hall Lane, there already exists an emergency access point to the Test Track, installed when the Test Track was originally developed.</p> <p>Should a roundabout be built at this point, it would solve a number of issues:</p> <ol style="list-style-type: none"> <li>1. It would slow traffic on an already dangerously fast road.</li> <li>2. It would allow the safe transit of Goods Vehicles and Articulated Lorries.</li> <li>3. It would allow easy access to the Railway Station at Midge Hall which it is proposed to open in accord with the wider project to meet the needs of new residents.</li> <li>4. It would allow a safe and convenient access to the new development which would join directly with footpaths and new cycle routes.</li> <li>5. It would negate the establishment of the two new access points which as explained are unerringly dangerous and the proposition of which is opposed by local residents.</li> <li>6. It would be cost effective.</li> </ol> <p>New Road</p> <p>The second proposal is to complete a new stretch of road, directly into the site from Schleswig Way. This road would run parallel with Dunkirk Lane, an already over-used road and take residents directly from the By-pass to the residential area of the new estate. There is a possible route along an existing stretch of existing roadway – Rhoden Road. This road is currently not a major service route.</p> <p>Together, these alternative proposals would ease traffic on both Longmeanygate and Dunkirk Lane and still provide direct access to the residential area of the new estate.</p> <p>More importantly, these options would I believe receive the support of the majority of local residents.</p> <p>CONCLUSION</p> <p>I ask that you consider these proposals benevolently in light of the argument presented and in the interest of local harmony, environmental protection, the overall safety of the public and the alleviation of at least some of traffic congestion that will undoubtedly plague this project.</p> <p>Those who reside here already and our future neighbours will all benefit from these proposals and I finish by stressing the need in such a large development to be cognisant not only to creating an inviting and safe environment for those who are to be encouraged to move to the area, but also those of us who already live here and possess a myriad of local knowledge to help the development succeed and will have our current lives and homes changed for ever as a result of this process.</p>
130	231	Chapter G	<p>It would appear that a substantial amount of green areas will be sacrificed to housing. I am pleased with the creation of the central park and the green corridor along London Way.</p> <p>Years ago I wrote to the local councillors suggesting the park to the East of Watkin Lane should be extended West by using the field between South View, Lostock Hall &amp; Farington Road to link up with the land to the West of Sherdley Road. Paths through would be an added advantage to save pedestrians walking along a road with no footpath. This field is an important wildlife corridor which is appreciated by the councillors on the planning committee if not by South Ribble planners and should certainly be added to the green corridor.</p>
131	233	Chapter D	<p>Summary of Representation</p> <p>In summary, Redrow find draft policy B1 and the allocation of site DD for housing to be sound. Whilst the majority of draft design Policy B6 can be supported, it is unsound on the grounds that the heritage criterion is inconsistent with national planning policy. In addition, it is considered that Policies D1 and D2 are unsound on a number of grounds:</p> <ul style="list-style-type: none"> <li>• The policies fail to allocate sufficient land to meet the objectively assessed development needs over the first 5 years of the plan when a 20% buffer of additional sites is factored in. Whilst the document suggests a windfall allowance may be included in the 5 year supply, compelling evidence to support this has not been provided.</li> <li>• The Council have not identified sufficient land to cover the entire plan period. The policies have built in no flexibility in the event of failure to deliver allocated sites. The policy as currently drafted provides no certainty that the scale of housing that will be required will be delivered and it is neither consistent with the pro-active stance of the NPPF, nor would it be effective.</li> <li>• Strategic sites, such as Pickering’s Farm, which require major infrastructure, planning and time for practical implementation will not achieve the levels of development suggested in the phasing strategy. Persistent under-delivery of housing appears set to continue (the under-supply has increased since 2011 to 560 dwellings) and so additional sites will need to be allocated and the phasing reconsidered to bring more sites into Phase 1.</li> <li>• In the circumstances, sites such as land to the south of draft allocation DD should be allocated for residential development to ensure that soundness of the strategy for housing delivery is achieved. I</li> </ul> <p>These points are elaborated below in our formal response to the Publication document, highlighting key issues the resolution of which we consider will ultimately be relevant to the ‘soundness’ of the document.</p> <p>In light of the issues of soundness raised and since there does not appear to be the option to request attendance on the representation forms, Redrow request to attend the Examination in Public</p>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>of the document.</p> <p>Context</p> <p>National Planning Policy Framework The National Planning Policy Framework ('the Framework') was published in March 2012. It sets out the Government's policies for the planning system and how these are expected to be applied positively and pro-actively to deliver sustainable economic growth and new development to meet identified needs. Central to the Framework is the presumption in favour of sustainable development. There are three dimensions of sustainable development, namely economic, social and environmental considerations, which are interdependent and should not be treated in isolation in the consideration of planning issues. Paragraph 14 of the Framework sets out the presumption in favour, which highlights that for plan-making the presumption in favour of sustainable development means:</p> <ul style="list-style-type: none"> <li>• local planning authorities should positively seek opportunities to meet the development needs of their area;</li> <li>• Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: <ul style="list-style-type: none"> <li>-any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</li> <li>-specific policies in this Framework indicate development should be restricted.</li> </ul> </li> </ul> <p>Further guidance on the preparation of Local Plans is set out at paragraphs 150 – 185. Paragraph 182 of the NPPF requires that when examining Local Plans, Inspectors should assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:</p> <ul style="list-style-type: none"> <li>• Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</li> <li>• Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</li> <li>• Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</li> <li>• Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</li> </ul> <p>It is against these tests that policies and allocations of the Site Allocations and Development Management Policies will be considered.</p> <p>Core Strategy The Central Lancashire Core Strategy was adopted by South Ribble on 18 July 2012. It provides the broad strategic approach for development in the area, and it forms the overarching framework against which sites will be allocated in the Site Allocations DPD.</p> <p>The overall vision of the Core Strategy is for Central Lancashire to be recognised as a highly sought after place to live and work in the North West; offering excellent quality of life to all its residents and playing a lead role in Lancashire's world class economy. Included within the Strategic Objectives there are specific objectives to foster growth (SO1) and make available and maintain a supply of housing land (SO5).</p> <p>To achieve these objectives, Core Strategy Policy 1 seeks to concentrate growth and investment in the Preston / South Ribble Urban Area; the settlements south of the River Ribble, including Lostock Hall; and the Key Service Centres of Leyland and Longridge; strategic sites at Cuerden, Samlesbury and Buckshaw Village.</p> <p>Longton is identified as a Rural Local Service Centre where limited growth and investment will be encouraged to help meet local housing and employment needs.</p> <p>Policy 4 of the Core Strategy sets out the (numeric) strategic housing requirement for the area. This identifies a requirement to plan for 1341 dwellings per annum in Central Lancashire, including 417 per annum in South Ribble.</p> <p>Policies D1 and D2: Allocation and Phasing of Housing Land Phase 1 (2010 – 2016)</p> <p>The housing allocations in the Publication Site Allocations DPD support and interpret the policies of the Core Strategy. The document currently allocates land to accommodate 4,108 dwellings over the plan period (2010 – 2026) which, when added to sites with planning permission, sites with current applications, and 'other sites' provides a total supply for the entire plan period of 6,962 units.</p> <p>Table 2 of the document identifies 3 phases for the housing delivery. The first phase is six years and runs from 2010 to 2016. For this first period, 2,712 dwellings are phased for delivery that is equivalent to 452 dwellings per annum.</p> <p>The housing requirement for South Ribble is 417 dwellings per annum and the SHLAA Update confirms that at March 2011, there was a shortfall against this target of 313 dwellings. Paragraph 7.14 confirms this shortfall will be made up over the first phase; this is supported by Redrow. The effect of this would be to increase the 5 year requirement to 480 dwellings per annum ((417 x 5) + 313) resulting in a 5-year requirement of 2,398 dwellings.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>Paragraph 47 of the NPPF confirms the adopted housing requirement should include a 5% buffer or a 20% buffer of additional sites, depending on whether there has been 'persistent under delivery'. South Ribble has not met the RSS annual housing requirement since the period 2005 – 2006 and it can be rationally concluded that a 20% buffer is therefore the most reasonable target for the Authority. Indeed this is acknowledged in Policy D2, which states:  "...Annual Monitoring of the delivery of housing will be undertaken. It will include a review of Sites and Phasing within Table 2 and aim to ensure that a 5 year supply (including a 20% buffer if appropriate, and if performance approves, the Council will look at reducing the buffer to 5% as part of the monitoring process)..."</p> <p>With a base date of March 2011, the effect of the 20% additional buffer is to increase the 5- year housing requirement to 2815 dwellings <math>([417 + 20\%] \times 5) + 313</math>, which is equivalent to 563 dwellings per annum. Therefore, the overall effect is that the supply of 2,712 dwellings identified in the Publication document would only provide 4.8 years' supply against the 5 year requirement (which is 2,815 dwellings). If compared to the 2011 SHLAA Update (the common base date for assessment, as information to March 2012 is not available), a supply of just 2,538 dwellings, is identified which is equivalent to just 4.5 years.</p> <p>Paragraph 7.13 of the consultation document states some flexibility of supply may be available by virtue of accounting for 45 windfall dwellings per annum. However, this is only suggested as an "indicative total", whereas paragraph 48 of the NPPF is clear that such an allowance should only be made if there is compelling evidence that sites have consistently become available and will continue to provide a reliable source of supply. The Council has not provided the 'compelling evidence' required to support a windfall allowance in the first 5 years of the plan.</p> <p>The sites allocated and phased by Policies D1 and D2 are therefore insufficient to meet the remaining requirements of the first phase of the plan. Policies D1 and D2 are therefore unsound, as they are not effective in the delivery of the basic (minimum) Core Strategy requirement. The policies are also unsound on the basis that they do not take the positive opportunities to meet the development needs of the area and are not consistent with national policy. They do not provide for the full, objectively assessed requirement of the Core Strategy (paragraph 47) or the additional NPPF buffer of 20%. The appropriate course of action would be to identify further sites in accordance with the evidence of housing supply.</p> <p>In order to make Policies D1 and D2 sound, it will be necessary to identify additional deliverable land in the remaining 5 years of Phase 1 (i.e. April 2011 – March 2016), sufficient to provide for 2,815 units (417 annual requirement + NPPF 20% x 5 years + 313 undersupply).</p> <p>It is notable that paragraph 7.14 of document states that the shortfall at April 2012 has increased further to 560 dwellings. This demonstrates the situation of undersupply is continuing. This further emphasises the need to bring forward sites now.</p> <p><b>Policy D1: The Requirement over the Core Strategy Entire Plan Period</b>  Policy D1 should allocate sufficient housing to meet the Core Strategy housing requirement, NPPF delivery buffer and the shortfall of 313 units. Over the remaining 15 year period of the plan, the total basic requirement is 6,568 dwellings <math>(417 \times 15 + 313)</math>, which is just less than the 6,962 dwellings identified. This does not include any delivery buffer and there is very little flexibility to react to rapidly changing circumstances over the 15 year period. Given that the strategic housing requirement is set as a minimum that may be exceeded the relatively limited number of allocations is considered to be unsound and unlikely to deliver the scale of housing that will be required.</p> <p>Whilst the allocation of additional sites is required to meet the annual requirement, accurate phasing of those sites already identified is required to ensure that the above situation of potential under-supply is not exacerbated. The following sections address this point with particular reference to proposed allocations under Policy D1:  <b>Draft Site Allocation EE: Pickering's Farm Strategic Site</b>  Policy D1 allocates a number of strategic sites in accordance with Policy 1 of the Central Lancashire Core Strategy. Pickering's Farm (Site EE), is a site on which the Council anticipate 300 dwellings to be delivered by 2016 (see Table 2).</p> <p>This is not considered realistic, as policy C1, which allocates the site, confirms in the supporting text at paragraph 6.6 that strategic infrastructure (the Cross Borough Link Road) needs to be delivered to enable its development. Additionally, a comprehensive masterplan is required to be submitted and approved, following which it will then be necessary to submit applications for Reserved Matters. To complete these tasks and then make a start on site will take at least 18 months, meaning development is unlikely to commence until late-2014 at the earliest. Given lead in times and development rates the site is unlikely to deliver more than c.50 dwellings in the first phase of the plan.</p> <p>The phasing of site EE is therefore considered unrealistic and the delivery of Policy D1 is further undermined. The current phasing of site EE is therefore considered unsound as it is not effective or justified. The issues with delivery of this site, and potentially others requiring strategic infrastructure highlights the need for additional land to be allocated to meet housing needs in the early part of the plan period.</p> <p><b>Omission of Land to the South of Draft Allocation DD</b>  In earlier representations, Redrow recommended that draft housing allocation DD (Gas Holders Site, Lostock Hall) should be extended to include land to the south, which would be released from a Health and Safety Executive Consultation Zone by virtue of development of site DD.  This area is shown on the enclosed plan (a resubmission of the plan provided previously), which highlights the area which is now available for development, which could be accessed via the existing Claytongate site for delivery in the first phase of the plan period. The site is available for development now, achievable and suitable and, in light of the shortfall of allocated sites highlighted in this representation, it is considered this site should be allocated to meet development needs.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>Draft Site Allocation DD: Gas Holders Site, Lostock Hall (Paragraphs 7.61 and 7.62)</p> <p>Site DD is adjacent to Redrow's existing site at Claytongate Drive and the allocation of this site for housing is supported. The allocation of site DD is supported and it is considered sound. This is on the basis that its allocation is the most appropriate strategy to assist in the delivery of the Core Strategy housing requirement and boost housing supply, which is consistent with National Policy.</p> <p><b>Policy B1 – Existing Built-Up Areas</b> Policy B1 provides for, "the re-use of undeveloped and unused land and buildings within existing built up areas." Policy B1 provides a sufficiently flexible approach to allow development of sites as they come available, which is in accordance with Paragraph 152 of the NPPF.</p> <p>The policy is therefore supported and it is considered sound, as it will provides for the delivery of non-allocated sites over the plan period as they become available. The policy is therefore both effective and consistent with national planning policy.</p> <p><b>Policy B6 – Design of New Development</b> This policy currently includes a criterion which states permission will be granted where, "The proposal would not adversely affect the character or setting of a listed building and / or any heritage asset." The NPPF states that in determining applications where heritage assets are affected, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be (paragraph 132). Where a development will lead to substantial harm to the significance of a designated heritage asset, permission should be refused, unless it is demonstrated the harm is necessary to achieve substantial public benefits, or a number of other criteria as listed apply (paragraph 133). Where less than substantial harm would be caused, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 134).</p> <p>In seeking to resist all adverse impacts, whatever magnitude, the policy conflicts with advice in the NPPF, rendering it unsound.</p> <p>To make the policy sound, the criterion should be amended to read: "The proposal would not lead the loss of, or result in harm to, the significance of a listed building or heritage asset, unless the identified degree of harm is considered to be outweighed by the public benefit of the proposed development."</p> <p><b>Summary</b> The representations above have identified that Policies D1 and D2 do not allocate or phase appropriately sufficient housing land to meet objectively assessed needs over the plan period. The completions gap appears to be extending (from 313 dwellings to 560 in the past two monitoring years) and the Council cannot be complacent in allocating sufficient land to meet need with an appropriate buffer to account for potential under-delivery on allocations.</p> <p>Allocations which have been identified need to be phased accurately (such as site EE) and potential sites (such as the site to the south of site DD) should be allocated.</p> <p>To fail to take these matters in to account would be to ultimately risk the failure of delivery of the Core Strategy objectives and sustainable growth objectives, sought by the NPPF. In the Circumstances, Redrow consider draft policies D1, D2 to be unsound.</p> <p>Redrow consider the allocation of site DD near their existing Claytongate site to be sound, as appropriate in scale and location for housing development to meet needs. They therefore represent the most appropriate strategy for housing and are consistent with national planning policy.</p> <p>Finally, Redrow find the development management policy B1, to be sound. This is because it provides a flexible approach to enable non-allocated sites to come forward. However, whilst the majority of Policy B6 on design can be supported, it has been found unsound on the grounds that the heritage criterion is inconsistent with national planning policy</p>
131	234	Chapter D - Policy D1 - Site CC	<p><b>Summary of Representation</b> In summary, Redrow find draft policy B1 and the allocation of site CC for housing to be sound. Whilst the majority of draft design Policy B6 can be supported, it is unsound on the grounds that the heritage criterion is inconsistent with national planning policy. In addition, it is considered that Policies D1 and D2 are unsound on a number of grounds:</p> <ul style="list-style-type: none"> <li>• The policies fail to allocate sufficient land to meet the objectively assessed development needs over the first 5 years of the plan when a 20% buffer of additional sites is factored in. Whilst the document suggests a windfall allowance may be included in the 5 year supply, compelling evidence to support this has not been provided.</li> <li>• The Council have not identified sufficient land to cover the entire plan period. The policies have built in no flexibility in the event of failure to deliver allocated sites. The policy as currently drafted provides no certainty that the scale of housing that will be required will be delivered and it is neither consistent with the pro-active stance of the NPPF, nor would it be effective.</li> <li>• Strategic sites, such as Pickering's Farm, which require major infrastructure, planning and time for practical implementation will not achieve the levels of development suggested in the phasing strategy. Persistent under-delivery of housing appears set to continue (the under-supply has increased since 2011 to 560 dwellings) and so additional sites will need to be allocated and the phasing reconsidered to bring more sites into Phase 1.</li> </ul> <p>These points are elaborated below in our formal response to the Publication document, highlighting key issues the resolution of which we consider will ultimately be relevant to the 'soundness' of the document.</p> <p>In light of the issues of soundness raised and since there does not appear to be the option to request attendance on the representation forms, Redrow request to attend the Examination in Public</p>

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			<p>of the document.</p> <p>Context</p> <p>National Planning Policy Framework</p> <p>The National Planning Policy Framework ('the Framework') was published in March 2012. It sets out the Government's policies for the planning system and how these are expected to be applied positively and pro-actively to deliver sustainable economic growth and new development to meet identified needs.</p> <p>Central to the Framework is the presumption in favour of sustainable development. There are three dimensions of sustainable development, namely economic, social and environmental considerations, which are interdependent and should not be treated in isolation in the consideration of planning issues. Paragraph 14 of the Framework sets out the presumption in favour, which highlights that for plan-making the presumption in favour of sustainable development means:</p> <ul style="list-style-type: none"> <li>• local planning authorities should positively seek opportunities to meet the development needs of their area;</li> <li>• Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: <ul style="list-style-type: none"> <li>-any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</li> <li>-specific policies in this Framework indicate development should be restricted.</li> </ul> </li> </ul> <p>Further guidance on the preparation of Local Plans is set out at paragraphs 150 – 185. Paragraph 182 of the NPPF requires that when examining Local Plans, Inspectors should assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:</p> <ul style="list-style-type: none"> <li>• Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</li> <li>• Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</li> <li>• Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</li> <li>• Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</li> </ul> <p>It is against these tests that policies and allocations of the Site Allocations and Development Management Policies will be considered.</p> <p>Core Strategy</p> <p>The Central Lancashire Core Strategy was adopted by South Ribble on 18 July 2012. It provides the broad strategic approach for development in the area, and it forms the overarching framework against which sites will be allocated in the Site Allocations DPD.</p> <p>The overall vision of the Core Strategy is for Central Lancashire to be recognised as a highly sought after place to live and work in the North West; offering excellent quality of life to all its residents and playing a lead role in Lancashire's world class economy. Included within the Strategic Objectives there are specific objectives to foster growth (SO1) and make available and maintain a supply of housing land (SO5).</p> <p>To achieve these objectives, Core Strategy Policy 1 seeks to concentrate growth and investment in the Preston / South Ribble Urban Area; the settlements south of the River Ribble, including Lostock Hall; and the Key Service Centres of Leyland and Longridge; strategic sites at Cuerden, Samlesbury and Buckshaw Village.</p> <p>Longton is identified as a Rural Local Service Centre where limited growth and investment will be encouraged to help meet local housing and employment needs.</p> <p>Policy 4 of the Core Strategy sets out the (numeric) strategic housing requirement for the area. This identifies a requirement to plan for 1341 dwellings per annum in Central Lancashire, including 417 per annum in South Ribble.</p> <p>Policies D1 and D2: Allocation and Phasing of Housing Land</p> <p>Phase 1 (2010 – 2016)</p> <p>The housing allocations in the Publication Site Allocations DPD support and interpret the policies of the Core Strategy. The document currently allocates land to accommodate 4,108 dwellings over the plan period (2010 – 2026) which, when added to sites with planning permission, sites with current applications, and 'other sites' provides a total supply for the entire plan period of 6,962 units.</p> <p>Table 2 of the document identifies 3 phases for the housing delivery. The first phase is six years and runs from 2010 to 2016. For this first period, 2,712 dwellings are phased for delivery that is equivalent to 452 dwellings per annum.</p> <p>The housing requirement for South Ribble is 417 dwellings per annum and the SHLAA Update confirms that at March 2011, there was a shortfall against this target of 313 dwellings. Paragraph 7.14 confirms this shortfall will be made up over the first phase; this is supported by Redrow. The effect of this would be to increase the 5 year requirement to 480 dwellings per annum ((417 x 5] + 313) resulting in a 5-year requirement of 2,398 dwellings.</p> <p>Paragraph 47 of the NPPF confirms the adopted housing requirement should include a 5% buffer or a 20% buffer of additional sites, depending on whether there has been 'persistent under delivery'. South Ribble has not met the RSS annual housing requirement since the period 2005 – 2006 and it can be rationally concluded that a 20% buffer is therefore the most reasonable target for the Authority. Indeed this is acknowledged in Policy D2, which states:</p> <p>"...Annual Monitoring of the delivery of housing will be undertaken. It will include a review of Sites and Phasing within Table 2 and aim to ensure that a 5 year supply (including a 20% buffer if appropriate, and if performance approves, the Council will look at reducing the buffer to 5% as part of the monitoring process)..."</p> <p>With a base date of March 2011, the effect of the 20% additional buffer is to increase the 5- year housing requirement to 2815 dwellings ((417 + 20%) x 5] + 313), which is equivalent to 563 dwellings per annum. Therefore, the overall effect is that the supply of 2,712 dwellings identified in the Publication document would only provide 4.8 years' supply against the 5 year requirement (which is 2,815 dwellings). If compared to the 2011 SHLAA Update (the common base date for assessment, as information to March 2012 is not available), a supply of just 2,538 dwellings, is identified which is equivalent to just 4.5 years.</p> <p>Paragraph 7.13 of the consultation document states some flexibility of supply may be available by virtue of accounting for 45 windfall dwellings per annum. However, this is only suggested as an "indicative total", whereas paragraph 48 of the NPPF is clear that such an allowance should only be made if there is compelling evidence that sites have consistently become available and will</p>



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			<p>continue to provide a reliable source of supply. The Council has not provided the 'compelling evidence' required to support a windfall allowance in the first 5 years of the plan.</p> <p>The sites allocated and phased by Policies D1 and D2 are therefore insufficient to meet the remaining requirements of the first phase of the plan. Policies D1 and D2 are therefore unsound, as they are not effective in the delivery of the basic (minimum) Core Strategy requirement. The policies are also unsound on the basis that they do not take the positive opportunities to meet the development needs of the area and are not consistent with national policy. They do not provide for the full, objectively assessed requirement of the Core Strategy (paragraph 47) or the additional NPPF buffer of 20%. The appropriate course of action would be to identify further sites in accordance with the evidence of housing supply.</p> <p>In order to make Policies D1 and D2 sound, it will be necessary to identify additional deliverable land in the remaining 5 years of Phase 1 (i.e. April 2011 – March 2016), sufficient to provide for 2,815 units (417 annual requirement + NPPF 20% x 5 years + 313 undersupply).</p> <p>It is notable that paragraph 7.14 of document states that the shortfall at April 2012 has increased further to 560 dwellings. This demonstrates the situation of undersupply is continuing. This further emphasises the need to bring forward sites now.</p> <p>Policy D1: The Requirement over the Core Strategy Entire Plan Period</p> <p>Policy D1 should allocate sufficient housing to meet the Core Strategy housing requirement, NPPF delivery buffer and the shortfall of 313 units. Over the remaining 15 year period of the plan, the total basic requirement is 6,568 dwellings (417 x 15 + 313), which is just less than the 6,962 dwellings identified. This does not include any delivery buffer and there is very little flexibility to react to rapidly changing circumstances over the 15 year period. Given that the strategic housing requirement is set as a minimum that may be exceeded the relatively limited number of allocations is considered to be unsound and unlikely to deliver the scale of housing that will be required.</p> <p>Whilst the allocation of additional sites is required to meet the annual requirement, accurate phasing of those sites already identified is required to ensure that the above situation of potential under-supply is not exacerbated. The following sections address this point with particular reference to proposed allocations under Policy D1:</p> <p>Draft Site Allocation EE: Pickering's Farm Strategic Site</p> <p>Policy D1 allocates a number of strategic sites in accordance with Policy 1 of the Central Lancashire Core Strategy. Pickering's Farm (Site EE), is a site on which the Council anticipate 300 dwellings to be delivered by 2016 (see Table 2).</p> <p>This is not considered realistic, as policy C1, which allocates the site, confirms in the supporting text at paragraph 6.6 that strategic infrastructure (the Cross Borough Link Road) needs to be delivered to enable its development. Additionally, a comprehensive masterplan is required to be submitted and approved, following which it will then be necessary to submit applications for Reserved Matters. To complete these tasks and then make a start on site will take at least 18 months, meaning development is unlikely to commence until late-2014 at the earliest. Given lead in times and development rates the site is unlikely to deliver more than c.50 dwellings in the first phase of the plan.</p> <p>The phasing of site EE is therefore considered unrealistic and the delivery of Policy D1 is further undermined. The current phasing of site EE is therefore considered unsound as it is not effective or justified. The issues with delivery of this site, and potentially others requiring strategic infrastructure highlights the need for additional land to be allocated to meet housing needs in the early part of the plan period.</p> <p>Draft Site Allocation CC: Land off Claytongate Drive, Lostock Hall (Paragraphs 7.59 and 7.60)</p> <p>In earlier representations to the Site Allocations Preferred Options consultation, support was offered for the allocation of site CC. This site lies directly to the west of Redrow's Claytongate Drive site, which already benefits from planning permission (reference '07/2010/0472/FUL). Redrow support this allocation and the phasing of the 15 units on this site in the first phase of the plan period and consider the policy to be sound.</p> <p>Policy B1 – Existing Built-Up Areas</p> <p>Policy B1 provides for, "the re-use of undeveloped and unused land and buildings within existing built up areas." Policy B1 provides a sufficiently flexible approach to allow development of sites as they come available, which is in accordance with Paragraph 152 of the NPPF.</p> <p>The policy is therefore supported and it is considered sound, as it will provides for the delivery of non-allocated sites over the plan period as they become available. The policy is therefore both effective and consistent with national planning policy.</p> <p>Policy B6 – Design of New Development</p> <p>This policy currently includes a criterion which states permission will be granted where, "The proposal would not adversely affect the character or setting of a listed building and / or any heritage asset."</p> <p>The NPPF states that in determining applications where heritage assets are affected, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be (paragraph 132). Where a development will lead to substantial harm to the significance of a designated heritage asset, permission should be refused, unless it is demonstrated the harm is necessary to achieve substantial public benefits, or a number of other criteria as listed apply (paragraph 133). Where less than substantial harm would be caused, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 134).</p> <p>In seeking to resist all adverse impacts, whatever magnitude, the policy conflicts with advice in the NPPF, rendering it unsound.</p> <p>To make the policy sound, the criterion should be amended to read:</p> <p>"The proposal would not lead the loss of, or result in harm to, the significance of a listed building or heritage asset, unless the identified degree of harm is considered to be outweighed by the public benefit of the proposed development."</p> <p>Summary</p> <p>The representations above have identified that Policies D1 and D2 do not allocate or phase appropriately sufficient housing land to meet objectively assessed needs over the plan period. The completions gap appears to be extending (from 313 dwellings to 560 in the past two monitoring years) and the Council cannot be complacent in allocating sufficient land to meet need with an appropriate buffer to account for potential under-delivery on allocations.</p> <p>Allocations which have been identified need to be phased accurately (such as site EE) and additional sites should be allocated to meet need.</p> <p>To fail to take these matters in to account would be to ultimately risk the failure of delivery of the Core Strategy objectives and sustainable growth objectives, sought by the NPPF. In the Circumstances, Redrow consider draft policies D1, D2 to be unsound.</p>



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			<p>Redrow consider the allocation of site CC and to be sound, as appropriate in scale and location for housing development to meet needs. They therefore represent the most appropriate strategy for housing and are consistent with national planning policy.</p> <p>Finally, Redrow find the development management policy, to be sound. This is because it provides a flexible approach to enable non-allocated sites to come forward. However, whilst the majority of Policy B6 on design can be supported, it has been found unsound on the grounds that the heritage criterion is inconsistent with national planning policy.</p>
131	235	Chapter D - Policy D1 - Sites M, V & X	<p>Summary of Representation</p> <p>In summary, Redrow find draft policy B1 and the allocation of sites M, V and X for housing to be sound. Whilst the majority of draft design Policy B6 can be supported, it is unsound on the grounds that the heritage criterion is inconsistent with national planning policy. In addition, it is considered that Policies D1 and D2 are unsound on a number of grounds:</p> <ul style="list-style-type: none"> <li>• The policies fail to allocate sufficient land to meet the objectively assessed development needs over the first 5 years of the plan when a 20% buffer of additional sites is factored in. Whilst the document suggests a windfall allowance may be included in the 5 year supply, compelling evidence to support this has not been provided.</li> <li>• The Council have not identified sufficient land to cover the entire plan period. The policies have built in no flexibility in the event of failure to deliver allocated sites. The policy as currently drafted provides no certainty that the scale of housing that will be required will be delivered and it is neither consistent with the pro-active stance of the NPPF, nor would it be effective.</li> <li>• Strategic sites, such as Pickering's Farm, which require major infrastructure, planning and time for practical implementation will not achieve the levels of development suggested in the phasing strategy. Persistent under-delivery of housing appears set to continue (the under-supply has increased since 2011 to 560 dwellings) and so additional sites will need to be allocated and the phasing reconsidered to bring more sites into Phase 1.</li> <li>• In the circumstances, additional sites should be allocated for residential development to ensure that soundness of the strategy for housing delivery is achieved.</li> </ul> <p>These points are elaborated below in our formal response to the Publication document, highlighting key issues the resolution of which we consider will ultimately be relevant to the 'soundness' of the document.</p> <p>In light of the issues of soundness raised and since there does not appear to be the option to request attendance on the representation forms, Redrow request to attend the Examination in Public of the document.</p> <p>Context</p> <p>National Planning Policy Framework</p> <p>The National Planning Policy Framework ('the Framework') was published in March 2012. It sets out the Government's policies for the planning system and how these are expected to be applied positively and pro-actively to deliver sustainable economic growth and new development to meet identified needs.</p> <p>Central to the Framework is the presumption in favour of sustainable development. There are three dimensions of sustainable development, namely economic, social and environmental considerations, which are interdependent and should not be treated in isolation in the consideration of planning issues. Paragraph 14 of the Framework sets out the presumption in favour, which highlights that for plan-making the presumption in favour of sustainable development means:</p> <ul style="list-style-type: none"> <li>• local planning authorities should positively seek opportunities to meet the development needs of their area;</li> <li>• Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: <ul style="list-style-type: none"> <li>-any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</li> <li>-specific policies in this Framework indicate development should be restricted.</li> </ul> </li> </ul> <p>Further guidance on the preparation of Local Plans is set out at paragraphs 150 – 185. Paragraph 182 of the NPPF requires that when examining Local Plans, Inspectors should assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:</p> <ul style="list-style-type: none"> <li>• Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</li> <li>• Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</li> <li>• Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</li> <li>• Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</li> </ul> <p>It is against these tests that policies and allocations of the Site Allocations and Development Management Policies will be considered.</p> <p>Core Strategy</p> <p>The Central Lancashire Core Strategy was adopted by South Ribble on 18 July 2012. It provides the broad strategic approach for development in the area, and it forms the overarching framework against which sites will be allocated in the Site Allocations DPD.</p> <p>The overall vision of the Core Strategy is for Central Lancashire to be recognised as a highly sought after place to live and work in the North West; offering excellent quality of life to all its residents and playing a lead role in Lancashire's world class economy. Included within the Strategic Objectives there are specific objectives to foster growth (SO1) and make available and maintain a supply of housing land (SO5).</p> <p>To achieve these objectives, Core Strategy Policy 1 seeks to concentrate growth and investment in the Preston / South Ribble Urban Area; the settlements south of the River Ribble, including Lostock Hall; and the Key Service Centres of Leyland and Longridge; strategic sites at Cuerden, Samlesbury and Buckshaw Village.</p> <p>Longton is identified as a Rural Local Service Centre where limited growth and investment will be encouraged to help meet local housing and employment needs.</p> <p>Policy 4 of the Core Strategy sets out the (numeric) strategic housing requirement for the area. This identifies a requirement to plan for 1341 dwellings per annum in Central Lancashire, including 417 per annum in South Ribble.</p> <p>Policies D1 and D2: Allocation and Phasing of Housing Land Phase 1 (2010 – 2016)</p> <p>The housing allocations in the Publication Site Allocations DPD support and interpret the policies of the Core Strategy. The document currently allocates land to accommodate 4,108 dwellings</p>

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			<p>over the plan period (2010 – 2026) which, when added to sites with planning permission, sites with current applications, and ‘other sites’ provides a total supply for the entire plan period of 6,962 units.</p> <p>Table 2 of the document identifies 3 phases for the housing delivery. The first phase is six years and runs from 2010 to 2016. For this first period, 2,712 dwellings are phased for delivery that is equivalent to 452 dwellings per annum.</p> <p>The housing requirement for South Ribble is 417 dwellings per annum and the SHLAA Update confirms that at March 2011, there was a shortfall against this target of 313 dwellings. Paragraph 7.14 confirms this shortfall will be made up over the first phase; this is supported by Redrow. The effect of this would be to increase the 5 year requirement to 480 dwellings per annum <math>([417 \times 5] + 313)</math> resulting in a 5-year requirement of 2,398 dwellings.</p> <p>Paragraph 47 of the NPPF confirms the adopted housing requirement should include a 5% buffer or a 20% buffer of additional sites, depending on whether there has been ‘persistent under delivery’. South Ribble has not met the RSS annual housing requirement since the period 2005 – 2006 and it can be rationally concluded that a 20% buffer is therefore the most reasonable target for the Authority. Indeed this is acknowledged in Policy D2, which states:</p> <p>“...Annual Monitoring of the delivery of housing will be undertaken. It will include a review of Sites and Phasing within Table 2 and aim to ensure that a 5 year supply (including a 20% buffer if appropriate, and if performance approves, the Council will look at reducing the buffer to 5% as part of the monitoring process)...”</p> <p>With a base date of March 2011, the effect of the 20% additional buffer is to increase the 5- year housing requirement to 2815 dwellings <math>([417 + 20\%] \times 5) + 313</math>, which is equivalent to 563 dwellings per annum. Therefore, the overall effect is that the supply of 2,712 dwellings identified in the Publication document would only provide 4.8 years’ supply against the 5 year requirement (which is 2,815 dwellings). If compared to the 2011 SHLAA Update (the common base date for assessment, as information to March 2012 is not available), a supply of just 2,538 dwellings, is identified which is equivalent to just 4.5 years.</p> <p>Paragraph 7.13 of the consultation document states some flexibility of supply may be available by virtue of accounting for 45 windfall dwellings per annum. However, this is only suggested as an “indicative total”, whereas paragraph 48 of the NPPF is clear that such an allowance should only be made if there is compelling evidence that sites have consistently become available and will continue to provide a reliable source of supply. The Council has not provided the ‘compelling evidence’ required to support a windfall allowance in the first 5 years of the plan.</p> <p>The sites allocated and phased by Policies D1 and D2 are therefore insufficient to meet the remaining requirements of the first phase of the plan. Policies D1 and D2 are therefore unsound, as they are not effective in the delivery of the basic (minimum) Core Strategy requirement. The policies are also unsound on the basis that they do not take the positive opportunities to meet the development needs of the area and are not consistent with national policy. They do not provide for the full, objectively assessed requirement of the Core Strategy (paragraph 47) or the additional NPPF buffer of 20%. The appropriate course of action would be to identify further sites in accordance with the evidence of housing supply.</p> <p>In order to make Policies D1 and D2 sound, it will be necessary to identify additional deliverable land in the remaining 5 years of Phase 1 (i.e. April 2011 – March 2016), sufficient to provide for 2,815 units (417 annual requirement + NPPF 20% x 5 years + 313 undersupply).</p> <p>It is notable that paragraph 7.14 of document states that the shortfall at April 2012 has increased further to 560 dwellings. This demonstrates the situation of undersupply is continuing. This further emphasises the need to bring forward sites now.</p> <p>Policy D1: The Requirement over the Core Strategy Entire Plan Period</p> <p>Policy D1 should allocate sufficient housing to meet the Core Strategy housing requirement, NPPF delivery buffer and the shortfall of 313 units. Over the remaining 15 year period of the plan, the total basic requirement is 6,568 dwellings <math>(417 \times 15 + 313)</math>, which is just less than the 6,962 dwellings identified. This does not include any delivery buffer and there is very little flexibility to react to rapidly changing circumstances over the 15 year period. Given that the strategic housing requirement is set as a minimum that may be exceeded the relatively limited number of allocations is considered to be unsound and unlikely to deliver the scale of housing that will be required.</p> <p>Whilst the allocation of additional sites is required to meet the annual requirement, accurate phasing of those sites already identified is required to ensure that the above situation of potential under-supply is not exacerbated. The following sections address this point with particular reference to proposed allocations under Policy D1:</p> <p>Draft Site Allocation EE: Pickering’s Farm Strategic Site</p> <p>Policy D1 allocates a number of strategic sites in accordance with Policy 1 of the Central Lancashire Core Strategy. Pickering’s Farm (Site EE), is a site on which the Council anticipate 300 dwellings to be delivered by 2016 (see Table 2).</p> <p>This is not considered realistic, as policy C1, which allocates the site, confirms in the supporting text at paragraph 6.6 that strategic infrastructure (the Cross Borough Link Road) needs to be delivered to enable its development. Additionally, a comprehensive masterplan is required to be submitted and approved, following which it will then be necessary to submit applications for Reserved Matters. To complete these tasks and then make a start on site will take at least 18 months, meaning development is unlikely to commence until late-2014 at the earliest. Given lead in times and development rates the site is unlikely to deliver more than c.50 dwellings in the first phase of the plan.</p> <p>The phasing of site EE is therefore considered unrealistic and the delivery of Policy D1 is further undermined. The current phasing of site EE is therefore considered unsound as it is not effective or justified. The issues with delivery of this site, and potentially others requiring strategic infrastructure highlights the need for additional land to be allocated to meet housing needs in the early part of the plan period.</p> <p>Sites M, V and X</p> <p>In addition to the site at Altcar Lane, Redrow also support the allocation of the following sites in Longton:</p> <ul style="list-style-type: none"> <li>• ‘M – South of Longton Hall, Chapel Lane, Longton’</li> <li>• ‘V – Land off School Lane, Longton’</li> <li>• ‘X – Land at Longton Hall, Chapel Lane, Longton’</li> </ul> <p>The allocation of these sites will support the delivery of the Core Strategy and their allocation is in accordance with national planning policy, which seeks to increase the delivery of housing. The sites are within the Rural Local Service Centre, which is prioritised for development in Core Strategy Policy 1. The development of these sites will support new housing development in that settlement and will ultimately assist in housing affordability and economic development in that location over the plan period. The allocation of these sites is therefore justified and it reflects the most appropriate strategy for housing development in this area of the borough. It is noted that site X is identified for delivery wholly within the first phase of the plan period, which Redrow would</p>

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			<p>also support.</p> <p>In light of this, Redrow consider the allocation of site M, V and X to be sound.</p> <p><b>Policy B1 – Existing Built-Up Areas</b>  Policy B1 provides for, “the re-use of undeveloped and unused land and buildings within existing built up areas.” Policy B1 provides a sufficiently flexible approach to allow development of sites as they come available, which is in accordance with Paragraph 152 of the NPPF.  The policy is therefore supported and it is considered sound, as it will provides for the delivery of non-allocated sites over the plan period as they become available. The policy is therefore both effective and consistent with national planning policy.</p> <p><b>Policy B6 – Design of New Development</b>  This policy currently includes a criterion which states permission will be granted where, “The proposal would not adversely affect the character or setting of a listed building and / or any heritage asset.”  The NPPF states that in determining applications where heritage assets are affected, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be (paragraph 132). Where a development will lead to substantial harm to the significance of a designated heritage asset, permission should be refused, unless it is demonstrated the harm is necessary to achieve substantial public benefits, or a number of other criteria as listed apply (paragraph 133). Where less than substantial harm would be caused, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 134).  In seeking to resist all adverse impacts, whatever magnitude, the policy conflicts with advice in the NPPF, rendering it unsound.  To make the policy sound, the criterion should be amended to read:  “The proposal would not lead the loss of, or result in harm to, the significance of a listed building or heritage asset, unless the identified degree of harm is considered to be outweighed by the public benefit of the proposed development.”</p> <p><b>Summary</b>  The representations above have identified that Policies D1 and D2 do not allocate or phase appropriately sufficient housing land to meet objectively assessed needs over the plan period. The completions gap appears to be extending (from 313 dwellings to 560 in the past two monitoring years) and the Council cannot be complacent in allocating sufficient land to meet need with an appropriate buffer to account for potential under-delivery on allocations.  Allocations which have been identified need to be phased accurately (such as site EE) and additional sites should be allocated to meet the shortfall.  To fail to take these matters in to account would be to ultimately risk the failure of delivery of the Core Strategy objectives and sustainable growth objectives, sought by the NPPF. In the Circumstances, Redrow consider draft policies D1, D2 to be unsound.  Redrow consider the allocation of sites M, V and X in the Key Rural Service Centre of Longton to be sound, as appropriate in scale and location for housing development to meet needs. They therefore represent the most appropriate strategy for housing and are consistent with national planning policy.  Finally, Redrow find the development management policy B1, to be sound. This is because it provides a flexible approach to enable non-allocated sites to come forward. However, whilst the majority of Policy B6 on design can be supported, it has been found unsound on the grounds that the heritage criterion is inconsistent with national planning policy.</p>
131	236	Chapter D - Policy D1 - Site P	<p><b>Summary of Representation</b>  In summary, Redrow find draft policy B1 be sound. Whilst the majority of draft design Policy B6 can be supported, it is unsound on the grounds that the heritage criterion is inconsistent with national planning policy. In addition, it is considered that Policies D1 and D2 are unsound on a number of grounds:</p> <ul style="list-style-type: none"> <li>• The policies fail to allocate sufficient land to meet the objectively assessed development needs over the first 5 years of the plan when a 20% buffer of additional sites is factored in. Whilst the document suggests a windfall allowance may be included in the 5 year supply, compelling evidence to support this has not been provided.</li> <li>• The Council have not identified sufficient land to cover the entire plan period. The policies have built in no flexibility in the event of failure to deliver allocated sites. The policy as currently drafted provides no certainty that the scale of housing that will be required will be delivered and it is neither consistent with the pro-active stance of the NPPF, nor would it be effective.</li> <li>• Strategic sites, such as Pickering’s Farm, which require major infrastructure, planning and time for practical implementation will not achieve the levels of development suggested in the phasing strategy. Persistent under-delivery of housing appears set to continue (the under-supply has increased since 2011 to 560 dwellings) and so additional sites will need to be allocated and the phasing reconsidered to bring more sites into Phase 1.</li> </ul> <p>In addition, and in order to provide certainty to developers in accordance with paragraph 14 of the NPPF, the extension of Worden Park (Policy G9 and Allocation P of Policy D1) should be made explicit on the Proposals Map. In the absence of this information, Policy G9 and Allocation P are deemed unsound.  These points are elaborated below in our formal response to the Publication document, highlighting key issues the resolution of which we consider will ultimately be relevant to the ‘soundness’ of the document.  In light of the issues of soundness raised and since there does not appear to be the option to request attendance on the representation forms, Redrow request to attend the Examination in Public of the document.</p> <p><b>Context</b>  <b>National Planning Policy Framework</b>  The National Planning Policy Framework (‘the Framework’) was published in March 2012. It sets out the Government’s policies for the planning system and how these are expected to be applied positively and pro-actively to deliver sustainable economic growth and new development to meet identified needs.  Central to the Framework is the presumption in favour of sustainable development. There are three dimensions of sustainable development, namely economic, social and environmental considerations, which are interdependent and should not be treated in isolation in the consideration of planning issues. Paragraph 14 of the Framework sets out the presumption in favour, which highlights that for plan-making the presumption in favour of sustainable development means:</p> <ul style="list-style-type: none"> <li>• local planning authorities should positively seek opportunities to meet the development needs of their area;</li> </ul>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<ul style="list-style-type: none"> <li>• Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: <ul style="list-style-type: none"> <li>-any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</li> <li>-specific policies in this Framework indicate development should be restricted.</li> </ul> </li> </ul> <p>Further guidance on the preparation of Local Plans is set out at paragraphs 150 – 185. Paragraph 182 of the NPPF requires that when examining Local Plans, Inspectors should assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:</p> <ul style="list-style-type: none"> <li>• Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</li> <li>• Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</li> <li>• Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</li> <li>• Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</li> </ul> <p>It is against these tests that policies and allocations of the Site Allocations and Development Management Policies will be considered.</p> <p><b>Core Strategy</b></p> <p>The Central Lancashire Core Strategy was adopted by South Ribble on 18 July 2012. It provides the broad strategic approach for development in the area, and it forms the overarching framework against which sites will be allocated in the Site Allocations DPD.</p> <p>The overall vision of the Core Strategy is for Central Lancashire to be recognised as a highly sought after place to live and work in the North West; offering excellent quality of life to all its residents and playing a lead role in Lancashire’s world class economy. Included within the Strategic Objectives there are specific objectives to foster growth (SO1) and make available and maintain a supply of housing land (SO5).</p> <p>To achieve these objectives, Core Strategy Policy 1 seeks to concentrate growth and investment in the Preston / South Ribble Urban Area; the settlements south of the River Ribble, including Lostock Hall; and the Key Service Centres of Leyland and Longridge; strategic sites at Cuerden, Samlesbury and Buckshaw Village.</p> <p>Longton is identified as a Rural Local Service Centre where limited growth and investment will be encouraged to help meet local housing and employment needs.</p> <p>Policy 4 of the Core Strategy sets out the (numeric) strategic housing requirement for the area. This identifies a requirement to plan for 1341 dwellings per annum in Central Lancashire, including 417 per annum in South Ribble.</p> <p><b>Policies D1 and D2: Allocation and Phasing of Housing Land Phase 1 (2010 – 2016)</b></p> <p>The housing allocations in the Publication Site Allocations DPD support and interpret the policies of the Core Strategy. The document currently allocates land to accommodate 4,108 dwellings over the plan period (2010 – 2026) which, when added to sites with planning permission, sites with current applications, and ‘other sites’ provides a total supply for the entire plan period of 6,962 units.</p> <p>Table 2 of the document identifies 3 phases for the housing delivery. The first phase is six years and runs from 2010 to 2016. For this first period, 2,712 dwellings are phased for delivery that is equivalent to 452 dwellings per annum.</p> <p>The housing requirement for South Ribble is 417 dwellings per annum and the SHLAA Update confirms that at March 2011, there was a shortfall against this target of 313 dwellings. Paragraph 7.14 confirms this shortfall will be made up over the first phase; this is supported by Redrow. The effect of this would be to increase the 5 year requirement to 480 dwellings per annum ((417 x 5) + 313) resulting in a 5-year requirement of 2,398 dwellings.</p> <p>Paragraph 47 of the NPPF confirms the adopted housing requirement should include a 5% buffer or a 20% buffer of additional sites, depending on whether there has been ‘persistent under delivery’. South Ribble has not met the RSS annual housing requirement since the period 2005 – 2006 and it can be rationally concluded that a 20% buffer is therefore the most reasonable target for the Authority. Indeed this is acknowledged in Policy D2, which states:</p> <p>“...Annual Monitoring of the delivery of housing will be undertaken. It will include a review of Sites and Phasing within Table 2 and aim to ensure that a 5 year supply (including a 20% buffer if appropriate, and if performance approves, the Council will look at reducing the buffer to 5% as part of the monitoring process)...”</p> <p>With a base date of March 2011, the effect of the 20% additional buffer is to increase the 5- year housing requirement to 2815 dwellings ((417 + 20%) x 5) + 313), which is equivalent to 563 dwellings per annum. Therefore, the overall effect is that the supply of 2,712 dwellings identified in the Publication document would only provide 4.8 years’ supply against the 5 year requirement (which is 2,815 dwellings). If compared to the 2011 SHLAA Update (the common base date for assessment, as information to March 2012 is not available), a supply of just 2,538 dwellings, is identified which is equivalent to just 4.5 years.</p> <p>Paragraph 7.13 of the consultation document states some flexibility of supply may be available by virtue of accounting for 45 windfall dwellings per annum. However, this is only suggested as an “indicative total”, whereas paragraph 48 of the NPPF is clear that such an allowance should only be made if there is compelling evidence that sites have consistently become available and will continue to provide a reliable source of supply. The Council has not provided the ‘compelling evidence’ required to support a windfall allowance in the first 5 years of the plan.</p> <p>The sites allocated and phased by Policies D1 and D2 are therefore insufficient to meet the remaining requirements of the first phase of the plan. Policies D1 and D2 are therefore unsound, as they are not effective in the delivery of the basic (minimum) Core Strategy requirement. The policies are also unsound on the basis that they do not take the positive opportunities to meet the development needs of the area and are not consistent with national policy. They do not provide for the full, objectively assessed requirement of the Core Strategy (paragraph 47) or the additional NPPF buffer of 20%. The appropriate course of action would be to identify further sites in accordance with the evidence of housing supply.</p> <p>In order to make Policies D1 and D2 sound, it will be necessary to identify additional deliverable land in the remaining 5 years of Phase 1 (i.e. April 2011 – March 2016), sufficient to provide for 2,815 units (417 annual requirement + NPPF 20% x 5 years + 313 undersupply).</p> <p>It is notable that paragraph 7.14 of document states that the shortfall at April 2012 has increased further to 560 dwellings. This demonstrates the situation of undersupply is continuing. This further emphasises the need to bring forward sites now.</p>



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			<p>Policy D1: The Requirement over the Core Strategy Entire Plan Period</p> <p>Policy D1 should allocate sufficient housing to meet the Core Strategy housing requirement, NPPF delivery buffer and the shortfall of 313 units. Over the remaining 15 year period of the plan, the total basic requirement is 6,568 dwellings (417 x 15 + 313), which is just less than the 6,962 dwellings identified. This does not include any delivery buffer and there is very little flexibility to react to rapidly changing circumstances over the 15 year period. Given that the strategic housing requirement is set as a minimum that may be exceeded the relatively limited number of allocations is considered to be unsound and unlikely to deliver the scale of housing that will be required.</p> <p>Whilst the allocation of additional sites is required to meet the annual requirement, accurate phasing of those sites already identified is required to ensure that the above situation of potential under-supply is not exacerbated. The following sections address this point with particular reference to proposed allocations under Policy D1:</p> <p><b>Draft Site Allocation EE: Pickering's Farm Strategic Site</b></p> <p>Policy D1 allocates a number of strategic sites in accordance with Policy 1 of the Central Lancashire Core Strategy. Pickering's Farm (Site EE), is a site on which the Council anticipate 300 dwellings to be delivered by 2016 (see Table 2).</p> <p>This is not considered realistic, as policy C1, which allocates the site, confirms in the supporting text at paragraph 6.6 that strategic infrastructure (the Cross Borough Link Road) needs to be delivered to enable its development. Additionally, a comprehensive masterplan is required to be submitted and approved, following which it will then be necessary to submit applications for Reserved Matters. To complete these tasks and then make a start on site will take at least 18 months, meaning development is unlikely to commence until late-2014 at the earliest. Given lead in times and development rates the site is unlikely to deliver more than c.50 dwellings in the first phase of the plan.</p> <p>The phasing of site EE is therefore considered unrealistic and the delivery of Policy D1 is further undermined. The current phasing of site EE is therefore considered unsound as it is not effective or justified. The issues with delivery of this site, and potentially others requiring strategic infrastructure highlights the need for additional land to be allocated to meet housing needs in the early part of the plan period.</p> <p><b>Draft Site Allocation P: Altcar Lane / Shaw Brook Road Allocation (Paragraphs 7.41 -7.43)</b></p> <p>The subject site is identified in the DPD as forming part of the draft allocation 'P: land between Altcar Lane / Shaw Brook Road, Leyland'. This confirms the allocation comprises 30.4ha with a total capacity of 430 dwellings. Table 2 which accompanies the policy identifies that housing will be delivered in three phases, with 170 dwellings in the period 2010 – 2016, 120 dwellings between 2016 – 2021 and 140 dwellings between 2021 and 2026.</p> <p>Paragraph 7.43 confirms the development would be expected to deliver on-site affordable housing, as well as providing land for an extension to Worden Park. However, the extent of this extension is not identified on the Proposals Map (see representation on Policy G9 below), which does not provide the certainty that developers require.</p> <p>As the site is deliverable (in the context of the tests set out paragraph 47 and footnote 11 of the NPPF), the allocation of the site in Policy D1 is considered to be justified and consistent with national planning policy; however, until the extent of the Worden Park extension is known, the effectiveness of the Policy is thrown in to question and therefore, it is considered unsound.</p> <p><b>Green Infrastructure and Networks – Future Provision: Policy G9 Worden Park</b></p> <p>Policy G9 asserts that an extension of Worden Park is directly linked to the development of the allocated housing site at Leyland Lane and Altcar Lane (site P), which is referred to earlier in these representations. The policy states that the Council will work with developers and relevant partners to ensure the delivery of the park's extension are in line with the delivery of the residential site (P).</p> <p>However, a change from the Preferred Options is that the park extension now not shown on the map and the whole site is shown in the Publication Draft document as a solely residential allocation. Redrow consider that the extent of the park extension should be shown on the Proposals Map, as it will provide certainty about the areas for development.</p> <p>Until this change is made, Policy G9 and the Proposals Map are considered unsound, as it may undermine the delivery, and therefore effectiveness, of allocation P and in turn Policy G9.</p> <p><b>Policy B1 – Existing Built-Up Areas</b></p> <p>Policy B1 provides for, "the re-use of undeveloped and unused land and buildings within existing built up areas." Policy B1 provides a sufficiently flexible approach to allow development of sites as they come available, which is in accordance with Paragraph 152 of the NPPF.</p> <p>The policy is therefore supported and it is considered sound, as it will provides for the delivery of non-allocated sites over the plan period as they become available. The policy is therefore both effective and consistent with national planning policy.</p> <p><b>Policy B6 – Design of New Development</b></p> <p>This policy currently includes a criterion which states permission will be granted where, "The proposal would not adversely affect the character or setting of a listed building and / or any heritage asset."</p> <p>The NPPF states that in determining applications where heritage assets are affected, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be (paragraph 132). Where a development will lead to substantial harm to the significance of a designated heritage asset, permission should be refused, unless it is demonstrated the harm is necessary to achieve substantial public benefits, or a number of other criteria as listed apply (paragraph 133). Where less than substantial harm would be caused, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 134).</p> <p>In seeking to resist all adverse impacts, whatever magnitude, the policy conflicts with advice in the NPPF, rendering it unsound.</p> <p>To make the policy sound, the criterion should be amended to read:</p> <p>"The proposal would not lead the loss of, or result in harm to, the significance of a listed building or heritage asset, unless the identified degree of harm is considered to be outweighed by the public benefit of the proposed development."</p> <p><b>Summary</b></p> <p>The representations above have identified that Policies D1 and D2 do not allocate or phase appropriately sufficient housing land to meet objectively assessed needs over the plan period. The completions gap appears to be extending (from 313 dwellings to 560 in the past two monitoring years) and the Council cannot be complacent in allocating sufficient land to meet need with an appropriate buffer to account for potential under-delivery on allocations.</p> <p>Allocations which have been identified need to be phased accurately (such as site EE) and potential sites (such as the site to the south of site DD) should be allocated. Certainty should also be</p>



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			<p>provided on allocations, such as at site P which should identify the extent of the Worden Park extension (Policy G9).  To fail to take these matters in to account would be to ultimately risk the failure of delivery of the Core Strategy objectives and sustainable growth objectives, sought by the NPPF. In the Circumstances, Redrow consider draft policies D1, D2 and policies G9 to be unsound.  Finally, Redrow find the development management policy, to be sound. This is because it provides a flexible approach to enable non-allocated sites to come forward. However, whilst the majority of Policy B6 on design can be supported, it has been found unsound on the grounds that the heritage criterion is inconsistent with national planning policy</p>
132	237	Telecommunications Policy	<p>Thank you for your recent consultation on the above. We have considered the proposal relevant to the Mobile Operators Association and would offer the following comment on their behalf.</p> <p>We would take this opportunity to comment that we consider it important that there remains in place a telecommunications policy within the emerging Local Development Framework. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of national Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development.</p> <p>The National Planning Policy Framework (NPPF) at paragraph 42 confirms that "advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services. " Paragraph 43 confirms that "in preparing local plans, local planning authorities should support the expansion of telecommunications networks", but should also "aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified."</p> <p>Further advice on the siting and design of telecommunications and good practice procedural guidance is contained within the Code of Best Practice for Mobile Phone Network Development (2002). This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process.</p> <p>As indicated above the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF. On this basis we would suggest that within the Local Development Framework (Local Plan) there should be a concise and flexible telecommunications policy contained within one of the statutory Documents. We recognise that this is likely to be contained in a Development Control/Management DPD rather than the Core Strategy which is of a strategic nature. Such a policy should give all stakeholders a clear indication of the issues which development will be assessed against. We would suggest a policy which reads;</p> <p>Proposals for telecommunications development will be permitted provided that the following criteria are met: -</p> <p>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</p> <p>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</p> <p>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</p> <p>(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</p> <p>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.</p> <p>It will of course depend on your Local Development Scheme as to which documents are produced, which documents have a statutory role in development control and which would be considered as material considerations. We would suggest that this policy be a stand alone policy within one of the main LDDs, with any back ground information, such as electromagnetic fields (EMFs) and public health, being contained within a separate Supplementary Planning Document. This could then be read with the guidance in NPPF and the Code of Best Practice to Mobile Phone Network Development to give a comprehensive background to any proposed development. We would consider it appropriate to introduce the policy and we would suggest the following;  Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document.....</p> <p>In summary, we are suggesting that a clear and flexible telecommunications policy be introduced in one of the main LDDs. This should be introduced by a short paragraph outlining the development pressures and the authority's policy aims. We have suggested text for both above. In keeping with the aims and objectives of the legislation any background information should be contained within a separate non- statutory LDD which would not need to go through the same consultation process.</p>
133	239	Chapter E - Policy E3 - Leyland Town	I write on behalf of our client, Wm Morrison Supermarkets Plc ('Morrisons'), in respect of the above document which is currently out for consultation. We thank you for providing us with an

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
		Centre	<p>opportunity to comment on the emerging DPD.</p> <p>Morrisons is a major food and grocery store operator, which currently operates stores at Olympian Way, Leyland and Station Road, Bamber Bridge.</p> <p>Our client would like to comment on the Council's proposals for the Town Centre boundary at Leyland, as defined in Appendix 4 of the DPD. For the reasons outlined below, we would strongly recommend that consideration is given to the expansion of Leyland's Town Centre's boundary to include the existing Morrisons store at Olympian Way.</p> <p>Annex 2 of the National Planning Policy Framework (NPPF) defines a Town Centre as an '...area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.'</p> <p>As acknowledged in paragraph 8.33 of the DPD, the existing Morrisons store is a key anchor of the town centre, and generates a significant number of linked journeys between the store and the Primary Shopping Area (PSA). This helps to ensure that the vitality and viability of Leyland is maintained. There is also a clear linkage between the Morrisons site and retail activity within the PSA.</p> <p>The DPD states that:</p> <p>'The development of the Tesco Extra store in Southern Towngate and the Morrisons store, together with the Argos Extra and the Homebase store on the former Farington Business Park site over the last ten years have brought in major investment into the town centre'.</p> <p>We note that the Local Plan Town Centre boundary from 2000 has been retained, which includes the Tesco Extra store. We would suggest that this boundary is now dated and does not reflect the recent developments in the town centre. Furthermore, given that the Morrisons and Tesco store clearly have a similar role within the Town Centre and a similar physical relationship to the PSA, we suggest that the Town Centre boundary of Leyland should be extended to include our client's store.</p> <p>We trust that this is helpful and would be grateful if you could ensure that Peacock and Smith is kept informed of the progress of the Site Allocations and Development Management Policies DPD and the Local Plan process in general.</p>
134	240	Chapter G - Policy G4	<ol style="list-style-type: none"> <li>1. The Publication Version of the Site Allocations and Development and Management Policies DPD (the DPD) allocates the site as Protected Open Land under policy G4. We submitted representations at the Preferred Options stage of consultation (enclosed, see pages 14 - 16) and again propose that the site be allocated for residential development under policy D1.</li> <li>2. The proposed allocation is not justified. It is understood that no studies have been undertaken to demonstrate that the site is a valuable area of open land or that it provides a natural break in the built-up area of New Longton. The LPA must demonstrate a significant change in circumstances at the site since it was allocated for development in the Local Plan. Furthermore, the majority of the front part of the site is dominated by the existing dwelling and its associated outbuildings.</li> <li>3. It is contested that the identified housing land supply set out in the DPD is not sufficient and as a result, additional deliverable land must be allocated for housing. CS policy 4 states that the LPA must achieve a minimum of 417 dwellings per year over the plan period which equates to a minimum requirement of 2085 dwellings over the 5-year period. The DPD acknowledges a shortfall of 560 dwellings as at March 2012 and states that the LPA is of the view that there is potential for this to be made up over the first 6 years of the Plan. Adding this shortfall to the minimum requirement results in it rising to 510 per year or 2552 over the 5-year period. If the shortfall were spread over the entire plan period the minimum annual requirement would rise to 454, or 2270 over the 5-year period.</li> <li>4. The requirement must rise again when the 5% buffer, increased to 20% where there has been a record of persistent under-delivery, is applied. As shown in the completions figures below, the LPA does have a record of persistent under-delivery and the 20% buffer must therefore be engaged: <ul style="list-style-type: none"> <li>• 2006/07 – 284 dwellings;</li> <li>• 2007/08 – 230 dwellings;</li> <li>• 2008/09 – 312 dwellings;</li> <li>• 2009/10 – 171 dwellings;</li> <li>• 2010/11 – 221 dwellings;</li> <li>• 04/2011 – 09/2011 – 102 dwellings.</li> </ul> </li> <li>5. The proposed Control Mechanism of policy D2 of the DPD does suggest that the 20% buffer should be applied. Engaging the 20% buffer results in the need for the DPD to identify a deliverable supply of 3062 (if shortfall made up over phase 1) or 2724 (if shortfall spread across plan period). The DPD identifies a deliverable supply of only 2712 units. This is not sufficient.</li> <li>6. Furthermore, as stated in our previous representation, a significant number of the sites identified as contributing towards the deliverable supply are not deliverable when assessed against footnote 11 of NPPF. This was confirmed in a recent appeal decision (ref: 2168530) that this practice was involved in where the Inspector considered the deliverable supply; the LPA stated that it had a supply of 4.3 years whereas we argued a supply of 1.8 years. The Inspector considered the deliverability of identified sites and stated "I consider that a more realistic supply figure is likely to be somewhere between these two divergent estimates". The DPD must take this into account and reexamine its deliverable supply; if it does not, it immediately risks being found unsound by an Inspector.</li> <li>7. It should also be noted that whilst the LPA increased the amount of allocated land following Preferred Options consultation, this was primarily done by increasing the size of the already large Pickering Farm site. This does not meet NPPF requirement to achieve choice and competition in the market.</li> </ol>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>8. It is evident that the DPD does not identify sufficient deliverable sites. There is a significant and serious shortage of deliverable land that must be addressed. The land edged red on the attached plan is deliverable, is in a sustainable location and can make a valuable contribution to the shortfall of market housing.</p> <p>9. It would also contribute to the shortfall of affordable housing in the borough and in particular, the local need in New Longton. The LPA has repeatedly stated that the local need is significant. It cannot be met by the proposed allocation within New Longton; additional sites that will provide affordable housing in line with policy 7 of the CS must be allocated.</p> <p>10. The appeal decision on the land off Long Moss Lane, New Longton (ref: 2168530) must be taken into account when considering the allocation of the land at The Fields. The Inspector considered the development of the other D9 site to be sustainable development, applying the presumption in favour. The Council needs further sites that the presumption in favour of sustainable development can be applied to and the land edged red provides such a site. It should therefore be allocated for residential development.</p>
134	247	Land off The Cawsey, Penwortham	<p>1. We act for the owners of the land edged red on the attached plan (plan ref: C69-6-SRM). The Publication Version of the Site Allocations and Development and Management Policies DPD (the DPD) allocates the site as Safeguarded Land under policy G3; the site forms part of the land South of Factory Lane and east of the West Coast Main Line. We submitted representations at the Preferred Options stage of consultation (enclosed) and again propose that the site be allocated for residential development under policy D1.</p> <p>2. In response to our previous representations the LPA stated that it is their view “that there are sufficient deliverable sites to provide an adequate and continuous supply of housing land to meet housing requirements” and that they therefore propose to retain the site as safeguarded land. It is contested that the identified supply is not sufficient.</p> <p>3. CS policy 4 states that the LPA must achieve a minimum of 417 dwellings per year over the plan period which equates to a minimum requirement of 2085 dwellings over the 5-year period. The DPD acknowledges a shortfall of 560 dwellings as at March 2012 and states that the LPA is of the view that there is potential for this to be made up over the first 6 years of the Plan. Adding this shortfall to the minimum requirement results in it rising to 510 per year or 2552 over the 5-year period. If the shortfall were spread over the entire plan period the minimum annual requirement would rise to 454, or 2270 over the 5-year period.</p> <p>4. The requirement must rise again when the 5% buffer, increased to 20% where there has been a record of persistent under-delivery, is applied. As shown in the completions figures below, the LPA does have a record of persistent under-delivery and the 20% buffer must therefore be engaged:</p> <ul style="list-style-type: none"> <li>• 2006/07 – 284 dwellings;</li> <li>• 2007/08 – 230 dwellings;</li> <li>• 2008/09 – 312 dwellings;</li> <li>• 2009/10 – 171 dwellings;</li> <li>• 2010/11 – 221 dwellings;</li> <li>• 04/2011 – 09/2011 – 102 dwellings.</li> </ul> <p>5. The proposed Control Mechanism of policy D2 of the DPD does suggest that the 20% buffer should be applied. Engaging the 20% buffer results in the need for the DPD to identify a deliverable supply of 3062 (if shortfall made up over phase 1) or 2724 (if shortfall spread across plan period). The DPD identifies a deliverable supply of only 2712 units. This is not sufficient.</p> <p>6. Furthermore, as stated in our previous representation, a significant number of the sites identified as contributing towards the deliverable supply are not deliverable when assessed against footnote 11 of NPPF. This was confirmed in a recent appeal decision (ref: 2168530) that this practice was involved in where the Inspector considered the deliverable supply; the LPA stated that it had a supply of 4.3 years whereas we argued a supply of 1.8 years. The Inspector considered the deliverability of identified sites and stated “I consider that a more realistic supply figure is likely to be somewhere between these two divergent estimates”. The DPD must take this into account and reexamine its deliverable supply; if it does not, it immediately risks being found unsound by an Inspector.</p> <p>7. It should also be noted that whilst the LPA increased the amount of allocated land following Preferred Options consultation, this was primarily done by increasing the size of the already large Pickerings Farm site. This does not meet NPPF requirement to achieve choice and competition in the market.</p> <p>8. It is evident that the DPD does not identify sufficient deliverable sites. There is a significant and serious shortage of deliverable land that must be addressed. The land edged red on the attached plan is deliverable and can make a valuable contribution to the shortfall.</p> <p>9. Following consultation on the Preferred Options DPD the LPA increased the amount of land allocated for residential development but again retained the land edged red on the attached plan as safeguarded land. The land that was allocated is not as sustainable. The Officer’s Report on application no. 07/2012/0127/OUT did acknowledge that the site is in a sustainable location. Upon closer inspection of the Sustainability Appraisal of Preferred Options Site Allocations and Development Management DPD, it is evident that the site was incorrectly assessed and this may be a reason why it has been ignored as a housing site. The Site Appraisal is attached and the following errors have been identified:</p> <ul style="list-style-type: none"> <li>• The Appraisal acknowledges that a railway station lies within 1.61 to 2.4km but then states that there is no station when rail service frequency is considered and gives a Band E performance. The frequency at Lostock Hall station is 2 – 3 trains/hour/direction which comes under a Band B performance.</li> <li>• The Appraisal states that the site is within Flood Zone 2 and 3. The site edged red on the attached plan is within Flood Zones 1, 2 and 3a but Zones 2 and 3a form only a very small portion of the site and it has been demonstrated via application no. 07/2012/0127/OUT that the site can be developed without encroaching into zones 2 and 3a.</li> <li>• The Appraisal states the site is a Band E performer with regard access to a sewer system. However, the proposals under application no. 07/2012/0127/OUT have again demonstrated that this is not an issue.</li> <li>• The Appraisal states the site is at risk from a hazardous installation and therefore a Band E performer with regard this indicator. This is incorrect and again, was not an issue for concern with regard application no. 07/2012/0127/OUT.</li> </ul> <p>10. The LPA has also repeatedly pointed to highways concerns relating to the development of the site. Application no. 07/2012/0127/OUT was refused on highway grounds. However, Lancashire County Council has recently confirmed that the development of the site for up to 75No. dwellings would cause no highway safety concerns. LCC are close to agreeing the removal of the highways</p>

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			<p>reason for refusal of application no. 07/2012/0127/OUT so that highways matters are not contested at appeal.</p> <p>11. The Sustainability Appraisal must be reassessed to give an accurate appraisal of the site which does perform better than a number of the allocated sites. In light of the reassessment, the lack of any highways concerns and the need for additional deliverable land, the site should be allocated for residential development.</p>
135	241	General	<p>Wainhomes, as an important housebuilder in the region, has significant experience in developing houses in South Ribble where it has completed dwellings continuously through the recession.</p> <p>These representations are based on this recent and extensive experience of the delivery of housing within the district. As a local housing developer the company has completed many housing developments within South Ribble and the adjoining Chorley areas in the last few years including through the current recession and has found a market and successfully sold properties most of which are just completed. Wainhomes has a real and current understanding of the local market conditions and is better placed than anyone to judge the demand for properties in the borough. It will be seen from the detailed representations below that overall it is considered that the Preferred Options DPD:</p> <p>A) Allocates insufficient land to meet a) the 5 year requirement for deliverable sites and  b) longer term requirements of developable land. In part this is because of overoptimistic assumptions on the achievable development rates of many of the larger sites and in part from the reliance on sites not attractive to developers or the housing market. This is long standing weakness of the borough's housing land availability assessments as shown in the evidence base of past developments;</p> <p>B) Over-reliance on very large sites which are significantly constrained by inadequate infrastructure. Importantly, there is no sound mechanism set out in the plan for overcoming the infrastructure constraints;</p> <p>C) Continued reliance on sites which fail the tests of deliverability to meet the 5 year supply of the first phase in the plan;</p> <p>D) No flexibility in the plan to bring forward additional sites through phasing policies should development rates fall below the required trajectory required in the core strategy. In the absence of the capacity to release land, references to phasing can only mean to reducing supply; and</p> <p>E) The plan needs to bring forward more sites and a more diverse range of sites in order to deliver the development required by the Core Strategy policy 4. In particular it needs to show more sites that are immediately developable in order to maximise housing completions in the early years of the plan, and to take into account the probable requirement of National Planning Policy framework for a margin of 20% over the core strategy requirement for flexibility and choice. It must be recognised at this stage that the core strategy housing policies are not sound and that sound policies may require a significantly larger allocation for new housing.</p>
135	242	Chapter A	<p>Whilst Appendix 4B rather coyly expunges the cost estimates from the identified infrastructure projects, analysis against the core strategy schedule in Appendix 4A shows:</p> <p>A) Projected infrastructure costs of £38m are specifically to be funded by developers;</p> <p>B) Projected costs of £108m are to be shared between developers and public agencies;</p> <p>C) Unidentified costs associated with Public Realm schemes and also with the Cross Borough Link Road are to be borne by developers. In round terms, this indicates funding from developers of at least £100m is expected by 2026 in order to overcome infrastructure constraints. If this were to be borne solely through housing development it would imply a charge of £18k a dwelling for the 5,600 currently uncommitted sites anticipated in the Preferred Options DPD. The DPD is silent on this critical element of its proposals. Whilst it is understood that the Central Lancashire districts are jointly considering their Community Infrastructure Levy proposals, the DPD clearly cannot be tested for soundness in isolation from such work. In addition, some of the major sites proposed for allocation are dependent at the outset on major infrastructure investment by developers, for instance the Penwortham Bypass and its required bridge over the West Coast Main Line railway. This gives rise to a 'chicken and egg' situation which is ignored in the consultation DPD.</p> <p>In addition to these identified infrastructure schemes, it is also essential to factor in on-site provision of services and facilities into the assessment of the viability of the plan's proposed housing allocations. A number of sites require on-site provision of schools and other community facilities. In addition, the core strategy (if found sound and then adopted) requires generally 30% affordable housing and all houses constructed to Sustainable Homes Code 41.</p> <p>The fact that the developer contributions and on-site provision is calculated on a basis of numbers of dwellings proposed regardless of whether they are affordable or market houses. Thus, spreading the cost of affordable housing over the development as a whole will bear disproportionately on the cost of delivering market dwellings.</p> <p>There is no evidence at all in the DPD to show whether the burden of these accumulated costs is viable. Without a clear evidence base to show that the housing requirement can be met on sites that are viable to develop the plan must be considered unsound.</p>
135	243	Chapter B	<p>It is noted that land allocated under See section in attached submission is for local needs only and excludes market housing. Given the very poor prospect of 100% affordable housing coming forward on such sites, as can be seen from the non-development over many years of the current policy D9 sites, the identified need for 50 affordable housing units in New Longton and Longton will not be met through this policy.</p>
135	244	Chapter C - Policy C1 - Pickering's Farm	<p>Representations relevant to Pickering's Farm, Penwortham and Moss Side Test Track are also referred to in the above representations on Chapter A).</p> <p>Pickering's Farm, Penwortham</p> <p>This is a multi-ownership site where prior agreement is required to a range of specific considerations. In addition, the site is dependent on the provision of a westward extension to the Cross Borough Link Road which includes the construction of a new bridge crossing the West Coast Main Line. The section of the Cross Borough Link Road intended to be extended has neither been programmed nor funded, as discussed above.</p>



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			<p>Whilst the site is likely to make a large contribution to the housing land supply in the plan period, it is unreasonable to assume that the serious constraints can be overcome and agreement between all land owners and developers achieved in time to allow the site to deliver 100 dwellings in phase 1. In addition, it is most unlikely that average completion rates as high as 100 dwellings a year can be achieved through the remaining phases of the plan. Alterations to this site are proposed below in the discussion on Homes for All.</p>
135	245	Chapter D	<p>Policy D1 It is of immediate concern that at §7.3 there is no reference to the core strategy having been found by the inspector to be unsound in its housing policies. The core strategy policy 4 does not set out housing requirements in line with RSS and which equate to 417 dwellings a year. Rather, there are some proposed changes to the policy which have yet to be considered by the Inspector. Many representations have been made to the inadequacy of these proposed alterations, not least that they do not allow any margin for competition and choice.</p> <p>Draft NPPF proposes a 20% margin for this purpose and that may be enshrined in national planning policy within the next 3 months. The fact that, for the period 2010 -2026 the housing requirement in the DPD of 6,984 dwellings is matched by a supply of 6,964 dwellings is a wholly inadequate basis on which to plan to provide 'Homes for All'. The immediate assumption underpinning the allocations is that all of the sites identified will deliver completely at the planned capacity during the 16 year plan period. That this is a flawed assumption is evident for several reasons. It includes sites that have been allocated over more than a decade, a period embracing a booming housing market, and which have still not attracted residential development. Planning to deliver the required housing trajectory over the next decade or so must take into account such clear market signals as well as the more challenging requirements of the current and expected future housing market, for instance by allocating a more diverse range of smaller sites. The approach adopted in the DPD also assumes that all sites with planning permission are intended for development when, as is well known, landowners can enhance the value of their property portfolio by gaining consent for housebuilding without having any intention of realising that value.</p> <p>The reduction of funding available through the public purse for affordable homes emphasises the importance of encouraging market housing development which is sufficiently viable to deliver the 30% affordable housing now sought through the core strategy.</p> <p>Reliance on sites such as the Wesley Street Mill to deliver housing in significant numbers, let alone development at 92 dph, indicates that the authority has failed to comprehend the fundamental change in the housing market on which it is reliant on to provide 'Homes for All', including a high proportion of affordable houses as well as major infrastructure projects identified as necessary for many of the sites proposed for allocation.</p> <p>Another of the market requirements not fully appreciated in the DPD is the need of a diversity of developing sites exploiting all aspects of the housing market, rather than the concentration of development in a few large sites. Not only does the market act as a constraint on the rate at which such large sites can develop, the initial costs of site acquisition and provision of infrastructure can impose pre-development costs which are very difficult or impossible to fund and therefore constrain such sites from contributing to meeting the need of 'Homes for All'.</p> <p>More detailed concerns relating to the housing land proposed allocations is given below. That is followed by a discussion of existing and potential further sites, the release of which is essential if the overall housing land supply is to meet the requirement for robustness, contain flexibility to meet unforeseen circumstances and to provide choice and competition. If CIL is brought into force in the district, such sites will contribute to accumulating the funds needed to deal with the serious infrastructure constraints that must be overcome before some of the proposed large sites can commence development.</p> <p>Commentary on Proposed Allocations  Group One, off Central Avenue, Buckshaw Village, Leyland  Shown as 260 dwelling capacity in 2010 SHLAA and no development progress since then. No detailed consents although a reserved matters application for 75 dwellings has been submitted. In the light of these facts, 260 dwellings in the remaining 4 years of the Plan 1st phase is 65 dwellings a year and this is a serious overestimate of potential contribution for the first phase of the consultation DPD. It may deliver this number of dwellings over the full plan period.</p> <p>Former Farington Business Park, Farington  This was assessed in 2010 SHLAA as having a capacity of 471 dwellings and contributing 145 to the 5 year supply. In the 2 years since then, no development has come forward, and no further applications have been submitted even though the site needs replanting to meet current housing market requirements, in particular given the demand for family housing rather than apartments. In the light of the post-recession housing market here is little prospect of the site delivering 471 dwellings when it is developed. There is no prospect of the site delivering the required 36 dwellings a year contribution to the first phase of the plan.</p> <p>Former Prestolite Factory, Cleveland Road, Leyland  The planning application validated in June 2009 has yet to be determined because there is no agreement to s106 obligations. Given what must be significant issues with the delivery of this site there is little prospect of the development being forthcoming in the near future. There has been no movement towards bringing this site into development since the 2010 SHLAA. Even if the development were to commence in the near future, there is very little prospect of it achieving 25 dwellings a year.</p> <p>Former Arla Foods Premises, School Lane, Bamber Bridge</p>



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			<p>The site was vacated in 2004. Outline planning permission submitted in September 2009 was granted in March 2011. The site remains fully developed with industrial buildings and the applicant is the owner rather than a developer. As the site has yet to be successfully marketed and subsequent reserved matters applications approved, there is no prospect of an early start on site. There is no prospect of the site delivering 150 dwellings by 2016: even if development commenced in 2012 this requires completion of 38 dwellings a year, which is around double the likely rate of sales.</p> <p>Vernon Carus and Land, Factory Lane, Penwortham This site has major thresholds to overcome before development can commence. It is dependent on the construction of the Cross Borough Link Road (Policy A1). It is shown at §9.5 of the consultation DPD as requiring important funding through CIL, other developer contributions and support from the Local Transport Plan 3. This LTP takes a 10 year view of transport investment and there is as yet no agreement with regard to schemes to be funded in that period. The LTP states: “2.1 Our strategy takes a ten year view of transport in Lancashire. However, this is a particularly challenging time in which to prepare a framework for transport. The worst impacts of the recession may be passed, but the effects upon Lancashire's economy will continue to be evident over the next few years. As the public sector faces considerable cuts, we also face uncertainties about the level of funding that will be available for transport schemes and initiatives.” “2.2 Recognising that public finance for transport is likely to be limited in the early years of this ten year strategy, we will need to focus, at least in the short term, on certain key actions which can deliver most benefit for Lancashire in these challenging times.”</p> <p>It must remain very uncertain when or if this highway scheme will be constructed, and the housing developments that are dependent upon it (including that of the Lostock Hall Gas Works site) is equally uncertain. There is no reason at all to expect delivery within the first phase of development in the plan. The expectation in the plan that the site will deliver 75 dwellings in that period cannot be accepted.</p> <p>Lostock Hall Gasworks, Lostock Hall The application referred to in the plan was submitted in 2007 and still has not been determined. The site is dependent on major investment in highway infrastructure, which as discussed above in relation to the Vernon Carus site is uncertain with regard to whether or when it will be delivered. . There is no reason at all to expect delivery within the first phase of development in the plan. The expectation in the plan that the site will deliver 110 dwellings in that period cannot be accepted.</p> <p>Land West of Grasmere Avenue, Farington This is an allocated site which has not come forward for development even in the good market conditions prevailing prior to the recession; it is in a poor market area. A recent outline application for 160 dwellings has been submitted and has yet to be determined. This is 40 dwellings less than included in the DPD. Given that outline planning permission is not yet available, that reserved matters will also need to be subsequently approved and the site is in a poor market area development in the first phase is more likely to be 40 dwellings than the 150 expected in the DPD. This assumes a willing developer bearing in mind the site is located in a very secondary location. Sites of this nature are not attractive in poor market conditions.</p> <p>Land between Altcar Lane/Shaw Brook Road, Leyland This site suffers from a number of constraints, including those of infrastructure and agricultural land quality. Whilst it may well be deliverable over the plan period, the prospect of all of the constraints and other planning requirements being met in time for it to deliver housing early in the plan period is remote and the delivery of 170 dwellings is unrealistic. Development is unlikely to commence at the earliest for 2 years as it depends on the adoption of the DPD as well as subsequently achieving the necessary planning consents; 50 dwellings is a more realistic prospect.</p> <p>Land off Wesley Street, Bamber Bridge This site is severely constrained by the existing mill building and its location in a poor market area with poor access. It is a site that the LPA has considered will contribute to the five year supply for many years, but this remains unrealistic. The expected density of 92 dph is similarly unrealistic and indicates that the conversion of the mill or the erection of new blocks of flats will occur. This expectation is a further constraint on the redevelopment of the site. The Council have for a number of years been looking for a development partner to assist in bringing this site forward. We are not aware of any developer interest to date.</p> <p>Land off Browndge Road, Bamber Bridge Whilst this site may have development potential if infrastructure constraints can be overcome, there is no indication of owner or developer interest in bringing the site forward for development. The current LDC application indicates a continuing interest for use as storage and distribution of aggregates. The expectation that this site will be redeveloped for housing in the first phase of the plan is wholly unsubstantiated. The 2010 SHLAA assessed the site as delivering 60 dwellings by 2014 but there is still no application for housing development. The site may come forward in the later phases of the plan.</p> <p>South of Bannister Lane/North of Heatherleigh, Farington Moss It is noted that this site now relates to land North of Bannister Lane and restricts access to Heatherleigh and Croston Road, both at the southern end of the site. The prospect of all of the constraints and other planning requirements being met in time for it to deliver housing early in the plan period is remote and the delivery of 200 dwellings is unrealistic. Development is unlikely</p>

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			<p>to commence at the earliest for 2 years as it depends on the adoption of the DPD as well as subsequently achieving the necessary planning consents. Even then, the scope for development is constrained by the restriction to access on the southerly part of the site. Access from Bannister Lane for part of the development will facilitate achieving maximum completions.</p> <p>Gas Holders Site, Lostock Hall The 25 prospective dwellings indicated in Table 2 are not followed through in the plan phases. If the gasholders have been decommissioned the HSE hazard zones will be removed and this will facilitate other residential development in the immediate locality.</p> <p>This is a site where development can reasonably be considered to contribute additional dwellings to the plan's first phase.</p> <p>Site Proposals to Support and Enhance Housing Delivery Wainhomes continue to have house building interests within South Ribble and are in a position to make further significant contributions towards the Council's objectives of providing Homes for All.</p> <p>It should be noted that in the current depressed economy there is still a demand for new homes however this is being artificially suppressed by restrictive mortgage lending. Many of the sites Wainhomes are focussed on delivering are mid-market family homes aimed at second and third time purchasers where usually they have equity in their property and are less reliant upon high load-to-value mortgages. Combined with the ability to part exchange existing properties Wainhomes has an effective mechanism to generate a successful sales volume. Many other developers do not have this option.</p> <p>It should also be noted that many large sites will not come forward for commencement of development at this time as by their nature they consume substantial capital in land and infrastructure upfront costs. This results in very poor rates of return. Hence sites under 50 plots are much more manageable from a cash perspective.</p> <p>In order to facilitate the contribution that Wainhomes can make to meeting housing needs, the Council is requested to respond favourably to the following representations.</p> <p>Site Q Rear of Chapel Meadow, Longton. Wainhomes confirm that this can be brought forward for housing development in the short term and the site will contribute to meeting the deliverable 5 year supply of homes.</p> <p>Site BB Land adjacent to Barn Flatt Close, Higher Walton. Again it is confirmed that this site can be quickly brought forward for development and will contribute to the 5 year housing land supply.</p> <p>Site W Land North of Bannister Lane, Farington. This site is envisaged in the plan as being developed as a later phase of this major site and being accessed through it from the south. The allocation of this site is supported as a realistic and sustainable development opportunity capable of meeting a significant proportion of housing land needs over time. However, the expected development contribution of 200 homes to the requirements for Phase 1 of the DPD will not be realised because of the restricted time available to bring the site forward following allocation and the market restraint on completion rates that can be expected. The land north of Bannister Lane can be brought forward as an independent development accessed from Bannister Lane, which has capacity and a good quality access to Croston Road. This will enhance the capacity of this allocation to contribute to the delivery of houses in phase 1 of the plan, where the current proposals show a significant shortfall of deliverable sites. It is noted in Policy G3 that the land is referred to in error as safeguarded land.</p> <p>Site EE Pickering's Farm, Penwortham. This site suffers from major infrastructure thresholds to development, the costs of which are to be met from developer contributions. In the light of costs of from £7m to £15m to provide highway access provision (and the wider benefit of the Penwortham Bypass) and significant on-site provision of facilities, a greater development potential is required to fund the contribution to meeting infrastructure costs. The allocation takes an arbitrary line to the southern boundary when, in order to start development in the locality, extending the site southwards to Chain House Lane is logical and will allow some development to commence from a southern access which could start the flow of funding contributions to the wider highway scheme and also give a larger development capacity making the provision of the transport infrastructure more viable and therefore more certain.</p> <p>Current D9 Sites, Long Moss Lane, New Longton. It is noted that these two sites have been removed from the allocations for development in the existing local plan and included as G4 Protected Open Land in the DPD. The reasons for this change are not made explicit, but the indication is that if green belt were being reviewed the two sites would be included. In fact both sites have been identified in the existing local plan as being appropriate for urban development and not meeting the purposes of the green belt. There has been no change in circumstances since the local plan was adopted that would justify any change in this assessment.</p> <p>In recent reports to the planning committee relating to applications on one of these sites – land at the Fields – it was stated in relation to the existing Policy D9: "The settlement of New Longton is surrounded by Greenbelt which constrains further expansion. The land which is designated under this policy is excluded from the Greenbelt. It is reserved to meet compelling local needs which cannot be satisfied elsewhere. Otherwise it is envisaged that the land will remain in its existing use. The lack of development on the land so far does not mean that the policy should be ignored and development should be permitted – the policy and its reasoned justification is clear, that only development which satisfies all of the criteria will be permitted, otherwise the land will remain as it is."</p> <p>The LPA has identified a need of 50 affordable homes in the villages of Longton and New Longton. Other sites allocated to meet local needs are specifically not to accommodate market housing.</p>

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			<p>Given the history in the village that developments of 100% affordable housing development do not come forward, the only way of meeting this need is as part of market housing led development. Around 20% of this unmet need for affordable housing can be met in the short term by market housing development on these two sites.</p> <p>The current proposal in the Preferred Options DPD to designation the land as Protected Open Land is therefore illogical while the local need remains. The fact that these two sites have not been developed to meet local needs since their identification for the last 15 years is a clear indication that the policy restricting housing to 100% affordable housing only is not deliverable and that none of the local need will be met. Allowing market housing development as proposed here will meet 20% of the identified need in the two villages as well as contribute to meeting the districts requirement for new housing development. In town planning terms, both sites are bounded on two sides by estate development of the village and by other built development on the third side. The remaining side has a frontage to Long Moss Lane. In appearance the sites are seen only in the context of the urban area and not as comprising open countryside. Were they to be developed as proposed by Wainhomes, they would complete the urban form of the village providing strong and defensible boundaries along the existing edge of the Green Belt.</p> <p>In addition to contributing to meeting affordable housing needs, these sites are immediately developable and will contribute to meeting the acknowledged current deficit in deliverable housing, a deficit which continues in the draft DPD as a result of reliance on sites which have been shown to not be deliverable, overoptimistic assumptions on the start of housing development on sites proposed for allocation and unrealistic completion rates on many of the large sites. It is for these reasons that Wainhomes seeks the allocation of these two deliverable sites in the DPD.</p>
135	246	Chapter D	<p>It can be seen from the above analysis that there are significant weaknesses in the Preferred Options DPD which cannot be ignored if the plan is to be found sound. In particular it must be shown that the major constraints which prevent development of many of the large sites can be practically overcome before their contribution to meeting the required housing trajectory can be taken into account. In the absence of any costed analysis within of the plan that demonstrates that viable delivery mechanisms can be expected to be in place at appropriate times. Exploratory calculations on the information available indicate that quite unrealistic burdens will be placed on developers to the extent that sites will not be viable by a substantial margin. When the additional costs of developing housing to Code Sustainable Homes level 4 and delivery of affordable housing is added into the viability assessment the plan appears to be substantially flawed. It has to be born in mind that affordable homes are themselves a cost on the development and will be unable to contribute to the CIL and extra construction costs: that will fall as an additional burden on the market housing alone. The many constraints that must be overcome before many of the sites can contribute to meeting the housing needs of the core strategy make it most unlikely that the LPA's assessment of time and rate of delivery of new homes is realistic. When development on large sites does commence, market constraints indicate that the LPA has adopted unrealistically high rates of completion. Wainhomes has a number of sites in the borough where it has secured an interest which will allow it to commence housebuilding at an early stage. That opportunity should not be ignored and it would be a reasonable response to make the requested alterations to allow development of the sites as described above.</p>
135	616	Chapter C - Policy C2 - Moss Side Test Track	<p>For many years the LPA has included this site as a deliverable site within its housing land supply. It is now evident from Policy C2 that this was never the case and there are important access and infrastructure problems to overcome and detailed agreements to be reached on the form of development. It remains most unlikely that these will be achieved in time for the site to make any significant contribution of new housing to phase 1 of the plan. The expectation in table 2 that it will deliver 125 new homes in phase 1 is unjustified.</p>
136	248	Chapter G - Policy G3	<p>Land off The Cawsey, Penwortham</p> <p>1. We act for the owners of the land edged red on the attached plan (plan ref: C69-6-SRM). The Preferred Options Site Allocations/ Development and Management Policies DPD (the DPD) allocates the site as Safeguarded Land under policy G3; the site forms part of the land South of Factory Lane and east of the West Coast Main Line. We propose that the site be allocated for residential development under policy D1 for the following reasons:</p> <p>A. The site represents a sustainable option for residential development;</p> <p>B. The site is a more sustainable option than a number of the sites allocated;</p> <p>C. The site's allocation as safeguarded land does not accord with PPG2;</p> <p>D. The Council requires additional residential allocations.</p> <p>A: the site represents a sustainable option for residential development</p> <p>2. The site's eastern boundary is in part bound by residential development; it is also bound by residential development to the south and west. As confirmed in the DPD, the site will be further enclosed by residential development as a result of site H (see DPD Proposals Map) which lies to the east/north east. Upon development of site H, only some 155m of the site's 1160m perimeter (approx.) will not be bound by residential development; this equates to only 13%.</p> <p>3. As a result of this enclosure of the site, it will appear as underused greenfield land within the urban boundary; this is the second sequentially preferable land category for development, as set out in RSS policy DP4. As South Ribble is unable to meet its housing requirement using previously developed land (as confirmed in the DPD), other suitable infill opportunities should be taken and the site represents such an opportunity.</p> <p>4. The site is currently allocated as safeguarded land in the Local Plan (LP). Annex B of PPG2 states that in order for land to be safeguarded it must "be located where future development would be an efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned infrastructure, so promoting sustainable development." The sustainability of the site has therefore been acknowledged by the LPA. The approval of housing development surrounding the site together with the residential allocation of sites CC and DD further demonstrates that the LPA views the site as being in a sustainable location.</p> <p>5. Furthermore, the DPD proposals will result in the sustainability of the site being enhanced. As the Proposals Map demonstrates, The Cawsey will form part of the Cross Borough Link Road; the DPD states that the Link Road will "provide a local through route, improve accessibility in an east-west direction through the Borough, increase community access to the range of services within the Borough and help traffic flow on existing roads". The Proposals Map also demonstrates that a Bus Rapid Transit Route will run along the B5254; this will enhance opportunities for residents to travel by public transport.</p> <p>6. The environmental suitability of the site for residential development has also been considered. Our clients have commissioned a Flood Risk Assessment, Ecological Survey, Preliminary Risk Assessment, Transport Statement and Tree Survey; no significant constraints have been identified.</p>

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			<p>7. The site is suitable for development; it is also available now and achievable, given there is a reasonable prospect that housing will be delivered on the site within five years. The site is therefore deliverable in PPS3 terms.</p> <p>8. It is also of relevance that the development of the site could provide access into site H (as allocated on the DPD Proposals Map). Site H contributes significantly to the housing land supply identified in the DPD. The DPD states that access to the site will be from the proposed new access road serving the Lostock Hall Gasworks site (site K) which is the Cross Borough Link Road. It is understood that there are significant obstacles to be overcome, including a ransom, before that access can be provided. The development of our clients' site will provide an alternative access to site H which would allow it to contribute to the deliverable housing land supply.</p> <p>B: the site is a more sustainable option than some sites allocated under policy D1 9. Policy D1 of the DPD allocates housing sites. Our client's site represents a more sustainable option than a number of the 21 allocated sites.</p> <p>10. Firstly, both sites P (land between Altcar Lane/Shaw Brook Road, Leyland) and W (land south of Bannister Lane/North of Heatherleigh, Farington Moss) include land that is identified as being best or most versatile (BMV) agricultural land. Whilst the DPD states that on-site constraints such as BMV agricultural land can be addressed in the comprehensive layout proposals, it is highly unlikely that the land would remain in agricultural use, or if so could be farmed in a way that realised its BMV potential. The loss of this land prior to land such as the application site is contrary to current policies.</p> <p>11. Policy D11 of the LP states that BMV land will be developed only exceptionally if there is an overriding need for the development, and, whether sufficient land in lower grades is unavailable, or available lower grade land has an environmental value recognised by a national designation which outweighs agricultural considerations. Para. 28 of PPS7 states that "Where significant development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land (grades 3b, 4 and 5) in preference to that of a higher quality, except where this would be inconsistent with other sustainability considerations.". Our client's site represents an opportunity for the Council to allocate non-BMV land; the BMV land at site P and south of Bannister Lane in site W being a sequentially less preferable option. C: the site's allocation as safeguarded land does not accord with PPG2 12. Paragraph 2.</p> <p>12 of PPG2 states the following: When local planning authorities prepare new or revised structure and local plans, any proposals affecting Green Belts should be related to a time-scale which is longer than that normally adopted for other aspects of the plan. They should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period. In order to ensure protection of Green Belts within this longer timescale, this will in some cases mean safeguarding land between the urban area and the Green Belt which may be required to meet longer-term development needs.</p> <p>13. Our client's site is not between the urban area and the Green Belt. As previously stated, it is bound by existing residential development along part of its eastern boundary and to the south and west. It is also bound by Site H to the north/north east. It is acknowledged that part of the wider land allocated as Safeguarded Land does bound the Green Belt; however, it is only an insignificant percentage of the perimeter which does not justify the DPDs allocation; it cannot be stated that the land is between the urban area and Green Belt in the PPG2 sense.</p> <p>D: the Council requires additional residential allocations 14. The DPD allocates insufficient land to meet a) the 5 year requirement for deliverable sites and b) longer term requirements of developable land. In some cases this is because of infrastructure constraints. It is also in part because of over-optimistic assumptions on the achievable development rates of many of the larger sites and in part from the reliance on sites not attractive to developers or the housing market. This is long standing weakness of the borough's housing land availability assessments as shown in the evidence base of past developments this practice has been involved in. A number of the sites identified as contributing towards the deliverable/developable supply are discussed in turn below.</p> <p><b>Pickering's Farm, Penwortham</b> This is a multi-ownership site where prior agreement is required to a range of specific considerations. In addition, the site is dependent on the provision of a westward extension to the Cross Borough Link Road which includes the construction of a new bridge crossing the West Coast Main Line. The section of the Cross Borough Link Road intended to be extended has neither been programmed nor funded, as discussed above. Whilst the site is likely to make a large contribution to the housing land supply in the plan period, it is unreasonable to assume that the serious constraints can be overcome and agreement between all land owners and developers achieved in time to allow the site to deliver 100 dwellings in phase 1. In addition, it is most unlikely that average completion rates as high as 100 dwellings a year can be achieved through the remaining phases of the plan. Alterations to this site are proposed below in the discussion on Homes for All.</p> <p><b>Moss Side Test Track</b> For many years the LPA has included this site as a deliverable site within its housing land supply. It is now evident from Policy C2 that this was never the case and there are important access and infrastructure problems to overcome and detailed agreements to be reached on the form of development. It remains most unlikely that these will be achieved in time for the site to make any significant contribution of new housing to phase 1 of the plan. The expectation in table 2 that it will deliver 125 new homes in phase 1 is unjustified.</p> <p><b>Group One, off Central Avenue, Buckshaw Village, Leyland</b> Shown as 260 dwelling capacity in 2010 SHLAA and no development progress since then. No detailed consents although a reserved matters application for 75 dwellings has been submitted. In the light of these facts, 260 dwellings in the remaining 4 years of the Plan 1st phase is 65 dwellings a year and this is a serious overestimate of potential contribution for the first phase of the consultation DPD. It may deliver this number of dwellings over the full plan period.</p> <p><b>Former Farington Business Park, Farington</b> This was assessed in 2010 SHLAA as having a capacity of 471 dwellings and contributing 145 to the 5 year supply. In the 2 years since then, no development has come forward, and no further applications have been submitted even though the site needs replanting to meet current housing market requirements, in particular given the demand for family housing rather than apartments. In the light of the post-recession housing market here is little prospect of the site delivering 471 dwellings when it is developed. There is no prospect of the site delivering the required 36 dwellings a year contribution to the first phase of the plan.</p>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>Former Prestolite Factory, Cleveland Road, Leyland The planning application validated in June 2009 has yet to be determined because there is no agreement to s106 obligations. Given what must be significant issues with the delivery of this site there is little prospect of the development being forthcoming in the near future. There has been no movement towards bringing this site into development since the 2010 SHLAA. Even if the development were to commence in the near future, there is very little prospect of it achieving 25 dwellings a year.</p> <p>Former Arla Foods Premises, School Lane, Bamber Bridge The site was vacated in 2004. Outline planning permission submitted in September 2009 was granted in March 2011. The site remains fully developed with industrial buildings and the applicant is the owner rather than a developer. As the site has yet to be successfully marketed and subsequent reserved matters applications approved, there is no prospect of an early start on site. There is no prospect of the site delivering 150 dwellings by 2016: even if development commenced in 2012 this requires completion of 38 dwellings a year.</p> <p>Vernon Carus and Land, Factory Lane, Penwortham This site has major thresholds to overcome before development can commence. It is dependent on the construction of the Cross Borough Link Road (Policy A1). It is shown at § 9.5 of the consultation DPD as requiring important funding through CIL, other developer contributions and support from the Local Transport Plan 3. This LTP takes a 10 year view of transport investment and there is as yet no agreement with regard to schemes to be funded in that period.</p> <p>The LTP states: “2.1 Our strategy takes a ten year view of transport in Lancashire. However, this is a particularly challenging time in which to prepare a framework for transport. The worst impacts of the recession may be passed, but the effects upon Lancashire's economy will continue to be evident over the next few years. As the public sector faces considerable cuts, we also face uncertainties about the level of funding that will be available for transport schemes and initiatives.” “2.2 Recognising that public finance for transport is likely to be limited in the early years of this ten year strategy, we will need to focus, at least in the short term, on certain key actions which can deliver most benefit for Lancashire in these challenging times.” It must remain very uncertain when or if this highway scheme will be constructed, and the housing developments that are dependent upon it (including that of the Lostock Hall Gas Works site) is equally uncertain. There is no reason at all to expect delivery within the first phase of development in the plan. The expectation in the plan that the site will deliver 75 dwellings in that period cannot be accepted.</p> <p>Lostock Hall Gasworks, Lostock Hall The application referred to in the plan was submitted in 2007 and still has not been determined. The site is dependent on major investment in highway infrastructure, which as discussed above in relation to the Vernon Carus site is uncertain with regard to whether or when it will be delivered. . There is no reason at all to expect delivery within the first phase of development in the plan. The expectation in the plan that the site will deliver 110 dwellings in that period cannot be accepted.</p> <p>Land West of Grasmere Avenue, Farington This is an allocated site which has not come forward for development even in the good market conditions prevailing prior to the recession; it is in a poor market area. A recent outline application for 160 dwellings has been submitted and has yet to be determined. This is 40 dwellings less than included in the DPD. Given that outline planning permission is not yet available, that reserved matters will also need to be subsequently approved and the site is in a poor market area development in the first phase is more likely to be 40 dwellings than the 150 expected in the DPD.</p> <p>Land between Altcar Lane/Shaw Brook Road, Leyland This site suffers from a number of constraints, including those of infrastructure and agricultural land quality. Whilst it may well be deliverable over the plan period, the prospect of all of the constraints and other planning requirements being met in time for it to deliver housing early in the plan period is remote and the delivery of 170 dwellings is unrealistic. Development is unlikely to commence at the earliest for 2 years as it depends on the adoption of the DPD as well as subsequently achieving the necessary planning consents; 50 dwellings is a more realistic prospect.</p> <p>Land off Wesley Street, Bamber Bridge This site is severely constrained by the existing mill building and its location in a poor market area with poor access. It is a site that the LPA has considered will contribute to the five year supply for many years, but this remains unrealistic. The expected density of 92 dph is similarly unrealistic and indicates that the conversion of the mill or the erection of new blocks of flats will occur. This expectation is a further constraint on the redevelopment of the site.</p> <p>Land off Browndedge Road, Bamber Bridge Whilst this site may have development potential if infrastructure constraints can be overcome, there is no indication of owner or developer interest in bringing the site forward for development. The current LDC application indicates a continuing interest for use as storage and distribution of aggregates. The expectation that this site will be redeveloped for housing in the first phase of the plan is wholly unsubstantiated. The 2010 SHLAA assessed the site as delivering 60 dwellings by 2014 but there is still no application for housing development. The site may come forward in the later phases of the plan.</p> <p>South of Bannister Lane/North of Heatherleigh, Farington Moss</p>



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			<p>It is noted that this site now relates to land North of Bannister Lane and restricts access to Heatherleigh and Croston Road, both at the southern end of the site. The prospect of all of the constraints and other planning requirements being met in time for it to deliver housing early in the plan period is remote and the delivery of 200 dwellings is unrealistic. Development is unlikely to commence at the earliest for 2 years as it depends on the adoption of the DPD as well as subsequently achieving the necessary planning consents. Even then, the scope for development is constrained by the restriction to access on the southerly part of the site. Access from Bannister Lane for part of the development will facilitate achieving maximum completions.</p> <p>15. The fact that, for the period 2010 -2026 the housing requirement of 6,984 dwellings is matched by a supply of 6,964 dwellings is a wholly inadequate basis on which to plan to provide 'homes for all'. The immediate assumption underpinning this policy is that all of the sites identified will deliver completely at the planned capacity during the 16 year plan period. That this is a flawed assumption is evident for several reasons.</p> <p>16. It is also of immediate concern that at para. 7.3 there is no reference to the Core Strategy having been found by the inspector to be unsound in its housing policies. The core strategy policy 4 does not set out housing requirements in line with RSS and which equate to 417 dwellings a year. Rather, there are some proposed changes to the policy which have yet to be considered by the Inspector. Many representations have been made to the inadequacy of the proposed alterations, not least that they do not allow any margin for competition and choice. Draft NPPF proposes a 20% margin for this purpose and that may be enshrined in national planning policy within the next 3 months.</p> <p>17. At para. 7.13 of the DPD it is stated that: The Council would also expect to see some windfall development which would provide some flexibility. Based on previous windfall trends and on an assumption that each small site that receives planning permission will be built, an indicative total of 45 windfall dwellings may be built annually over the Plan period which will offer some flexibility to the housing supply.</p> <p>18. It is not appropriate to rely on windfall developments to provide flexibility, especially when the figure is based on an assumption that each small site that receives permission will be built. This is highly unlikely.</p> <p>19. It is for these reasons that our client's site must be allocated for residential development. It offers the Council a good portion of the additional housing land that they need.</p>
137	249	Chapter E - Policy E2	<p>This representation is submitted by RPS in relation to South Ribble's emerging Site Allocations and Development Management Policies Development Plan Document.</p> <p>RPS fully acknowledges that the Local Authority is keen to promote employment generating uses and ensure there is sufficient supply of employment land. However, RPS believe the emerging DPD is too restrictive and is not fully consistent with the National Planning Policy Framework, which highlights the need for flexibility within policy frameworks to ensure local authorities can respond to changing market circumstances and demand from individual occupiers.</p> <p>The document should seek to acknowledge the substantial employment benefits that can be afforded by 'non-traditional B Class uses' such as specialist retail operators and sui generis uses. The policy framework should enable individual schemes to be considered on their own merits in accordance with the relevant tests and criteria outlined within National Planning Policy guidance. RPS consider Policy E2 'Protection of Employment Areas and Sites' and paragraph 8.28 too restrictive and do not provide sufficient flexibility to support sustainable economic growth.</p> <p>Flexibility within National Planning Policy Framework The National Planning Policy Framework has sought to streamline National Planning Policy into a consolidated set of priorities with the overall thrust being a presumption in favour of sustainable development. The document emphasises the need for flexibility to ensure opportunities for development can be met. Paragraph 14 provides guidance regarding plan making indicating: "Local Planning Authorities should positively seek opportunities to meet the development needs of their area; local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change....."</p> <p>The need for flexibility is further emphasised at paragraph 21 which states: "Investment in business should not be overburdened by the combined requirements of planning policy expectations"</p> <p>It goes on to indicate that local authorities should: "Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policy should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances"</p> <p>The above illustrates a clear thread through national policy encouraging a more flexible approach to encourage and support businesses and to meet employment objectives through the planning process. The emerging policy framework should enable consideration of a wide range of uses which offer substantial employment benefits and supports economic growth.</p> <p>In this respect sui generis uses and indeed some large scale specialist retail operators can provide a substantial number and a wide range of employment opportunities accordingly, proposals such as housing, retail and other commercial uses should therefore be considered on their own merits in accordance with national policy guidance and Policy E2 should therefore reflect this. Whilst RPS acknowledge it is important to promote and protect land for traditional B Class uses, other major employment generating uses should also be encouraged so as to ensure that employment needs can be met through an adaptable and responsive plan-led process. In this respect, Policy E2 is considered to be too restrictive and should reasonably enable the consideration of a wider range of employment generating uses i.e. it should not restrict the use of sites to pure B Class uses. National planning policy adopts a flexible approach to the achievement of sustainable economic growth, recognising that different uses can have different and important employment generating benefits. Indeed, substantial employment benefits that can be afforded by non traditional B Class uses such as sui generis uses and specialist retail operators.</p> <p>RPS does not consider that the final sentence of supporting paragraph 8.28 relating to large scale retail development is appropriate. Policy should not seek to preclude forms of retail development which may have wide ranging benefits for local economy including local employment opportunities. Indeed, such proposals should duly be considered upon their merits and are capable of being considered against the NPPF which prescribes the key retail policy tests of the sequential approach to site selection and retail impact.</p>
137	614	Chapter C - Policy C4 - Cuerden	In relation to Policy C4 (Cuerden Strategic Site) RPS considers this site is suitable for a wide range of uses as suggested by the policy and by paragraph 6.27 of the supporting text. In respect of

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
		Strategic Site	paragraph 6.31 we consider that it would be more consistent to adopt the phrase 'appropriate retail, leisure and housing'. Whilst we recognise the importance of the need for proper planning of the site, we do not consider that a masterplan is the only means of achieving this. Individual sites could be bought forward without prejudicing the development of the wider site.
138	250	Chapter C - Policy C1 - Pickering's Farm	The County Council is not able to support further housing development in the Pickering's Farm (South of Penwortham and North of Farington) location (allocation covered by Policy C1), Moss Side test track (Policy C2) and land between Heatherleigh and Moss Lane (Policy C3) unless such development is tied to the provision of appropriate and necessary major additional transport infrastructure and education provision, full details of which should be presented as part of the proposals. Planning obligations should be sought accordingly and section 106 monies collected must reflect these overriding requirements. Community Infrastructure Levvy (CIL) receipts, set in the context of an up-to-date infrastructure delivery plan which similarly sets out full details of necessary major additional transport infrastructure and education provision, should also be prioritised accordingly.
138	251	Chapter C - Policy C4 - Cuerden Strategic Site	The County Council supports the recognition of the importance of the Cuerden Strategic Site as a site capable of stimulating economic growth in Central Lancashire and the wider Lancashire sub region. The County also supports the wording in Policy C4 that "Alternative uses may be appropriate where it can be demonstrated that they may help deliver the strategic employment aspirations for this site", however, the wording of the justification should be changed to refer to alternative uses acting as "enabling development" as it is considered that this would improve the prospects of delivering the strategic employment aspirations for this key site.
138	252	Chapter C - Policy C5 BAE Enterprise Zone	The County Council supports the recognition of the importance of the capability of the Enterprise Zone at Samlesbury to stimulate economic growth in Central Lancashire, the wider Lancashire sub region and nationally, with the potential of attracting significant inward investment of an international scale. Support is also given to the amendment to the green belt boundary shown in Appendix 3 to the Publication version document as this will facilitate delivery of the employment aspirations of this site.
138	253	Relationship to Other Planning Guidance	It may be worth noting the MWLDF Site Allocations and Development Management Policies DPD and stating that the DPD is at an advanced stage of preparation. The Examination in Public is currently suspended pending a further submission in September 2012. Some of the housing and employment site allocations are located partially on land allocated as Mineral Safeguarding Areas. Officers at the County should meet with you prior to your submission stage to consider how the sites go forward and to ensure that developers are aware of the requirement to be mindful of the implications of the significance of the Minerals Safeguarding Area. The County Council would subsequently require consultation on any planning applications for these sites.
138	254	Chapter A - Policy A1 – Developer Contributions	The County Council welcomes the introduction of a Developer Contributions Policy, and the inclusion of transport, community infrastructure (including education), and green infrastructure. Planning obligations should be sought accordingly and section 106 monies collected must reflect the overriding infrastructure requirements. CIL funding, tied to infrastructure delivery plans similarly containing full details of necessary education and highways infrastructure provision, should also be prioritised accordingly. This mechanism should prevent the situation where piecemeal development comes forward, contributing toward increased congestion and reduced highway capacity, but not contributing toward any infrastructure improvements, and jeopardising the progression of highway infrastructure improvements in an area as a whole. It is worth noting however, that due to the statutory consultation that the County must undertake for education requirements it would not be possible for a developer to provide the additional education provision themselves, the County would require a developer contribution which would then be spent on provision of the additional school places
138	255	Chapter A - Policies A2 and A3	Whilst Policies A2 (Cross Borough Link Road) and A3 (Completion of Penwortham Bypass) will ensure land is protected for their delivery, they cannot ensure delivery within the Plan period as that is dependent on funding. The document is clear that both will be funded through CIL/developer contributions, but with the caveat that LTP funding could be made available. Neither has funding currently allocated in either the County Council's Capital Programme through to 2014/15, or the LTP implementation Plan 2011/12 to 2013/14. Also it is not clear which is the priority, nor if sufficient CIL/developer funding can be raised to fund both. As both are seen as vital pieces of infrastructure for delivery of the plan, more clarity on funding priorities is needed.
138	256	Chapter C - Policy C1, C2, C3	Policy C1, C2 and C3 Policies C1 (Pickering's Farm), C2 (Moss Side Test Track) and C3 (Land between Heatherleigh and Moss Lane) all indicate that more highway/transport infrastructure is to be funded through CIL. CIL will be limited and the policies should reflect this. The proposed developments in the Pickering's Farm area and the other major residential led sites at Moss Side test track and land between Heatherleigh and Moss Lane pose substantial infrastructure challenges. County Council highways and education officers are currently working closely with South Ribble Council officers on such infrastructure matters; and officers are also preparing a highway and transport master plan to determine necessary and suitable forms of transport improvements and additional infrastructure and assist in the preparation of local plans, and ultimately the delivery of sustainable forms of development, across Lancashire. These may include some, or all, of the transport infrastructure proposals contained in the consultation document and will necessitate provision of major additional transport infrastructure yet to be identified. This will form part of a strategic and integrated transport solution to delivering the wider development strategy for Central Lancashire. With the Highways and Transport master planning exercise currently underway, and the initial stage due for completion by September 2012, the progression of the Site Allocation Plan to examination should await proper consideration of the likely impact and preferred infrastructure solution, through close working between district and county officers, ensuring that the two plans are compatible. If the infrastructure requirements are not identified prior to the submission of the plan, there is a significant risk that it will be found unsound by the inspector, as the plan would be undeliverable. Any sites of a significant size may also require the provision of a schools site and this must be considered when looking at the planning application. In general terms, Primary Schools in the South Ribble area are projected to be full to capacity or very close to being full within the next 5 years. One particular area of concern is Leyland which is showing a greater shortfall in places than the rest of South Ribble largely due to the significant rise in the birth rate. Secondary provision is not showing a shortfall in the short term, however longer term places will become tighter as this surge in birth rate filters through the primary schools and into the secondary schools. The County Council is therefore not able to support further housing development in the Pickering's Farm (South of Penwortham and North of Farington) location (allocation covered by Policy C1), Moss Side test track (Policy C2) and land between Heatherleigh and Moss Lane (Policy C3) unless such development is tied to the provision of appropriate and necessary major additional transport infrastructure and education provision, full details of which should be presented as part of the proposals. Planning obligations should be sought accordingly and section 106 monies collected must reflect these overriding requirements. CIL receipts, set in the context of an up-to-date infrastructure delivery plan which similarly sets out full details of necessary major additional transport infrastructure and education provision, should also be prioritised accordingly.

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
138	257	Chapter C - Policy C4 - Cuerden Strategic Site	<p>The County Council supports the recognition in the DPD of the importance of securing delivery of the strategic site at Cuerden. Recognition of the strategic site as being capable of stimulating economic growth in Central Lancashire and the wider Lancashire sub region is also supported.</p> <p>The County Council would wish to see the term comprehensive development which is used at part a) of Policy C4 deleted and replaced with the term integrated development. This better reflects the planning ambition that whatever is brought forward and delivered by potential different parties is done so in a manner which seeks to integrate one with the other. The word comprehensive should also be removed from paragraphs 6.29 and 6.31 of the justification for the same reason.</p> <p>The County also supports the wording in Policy C4 that "Alternative uses may be appropriate where it can be demonstrated that they may help deliver the strategic employment aspirations for this site", however, the wording of the justification should be changed to refer to alternative uses acting as "enabling development" as it is considered that this would improve the prospects of delivering the strategic employment aspirations for this key site.</p>
138	258	Chapter C - Policy C5 – BAE Systems, Samlesbury	<p>The County Council supports the recognition in the DPD of the importance of securing delivery of the Enterprise Zone at Samlesbury. Recognition of the importance of the capability of the Enterprise Zone at Samlesbury to stimulate economic growth in Central Lancashire, the wider Lancashire sub region and nationally and with the potential to attract significant inward investment of an international scale is supported.</p> <p>The amendment to the green belt boundary shown in Appendix 3 is supported as this will facilitate delivery of the employment aspirations for this site.</p>
138	259	Chapter E – Delivering Economic Prosperity	<p>The County Council supports the recognition in the DPD that the creation of employment opportunities is strongly linked to the availability and protection of suitable sites for employment purposes.</p>
138	260	Chapter G	<p>The County Council support all the Policies in Chapter G; however a few issues should be raised.</p> <p>NPPF states that: The planning system should contribute to and enhance the natural and local environment by... recognising the wider benefits of ecosystem services; Ecosystem services: The benefits people obtain from ecosystems such as, food, water, flood and disease control and recreation. The DPD document makes no reference to ecosystem services. SRBC may wish to examine how the DPD achieves this objective of the NPPF and incorporate appropriate amendments.</p> <p>Also, the NPPF states: Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks. Crucially, Local Plans should: identify land where development would be inappropriate, for instance because of its environmental or historic significance; Central Lancs Core Strategy Policy 22 relates to Biodiversity and Geodiversity but is not criteria-based nor does it identify or distinguish between the hierarchy of protected sites. The South Ribble Site Allocations and Development Management Policies DPD does not contain any development management policies which relate specifically to protected wildlife or geodiversity sites, as identified on the proposals maps. It would seem, therefore, that the local plan does not address the requirements established in the NPPF. Wildlife Corridors are identified on the Proposals Map. The NPPF requires local planning authorities to: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation; promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan; contain a clear strategy for enhancing the natural, built and historic environment, The County Council does not believe that the sites and wildlife corridors identified are adequate to address these requirements and establish a "coherent ecological network" nor is a clear strategy for enhancement of the natural environment identified. Further consideration needs to be given to these aspects and appropriate measures developed, included and monitored. The conservation and enhancement of the natural environment is a strategic priority and the NPPF requires county and district authorities to work collaboratively to enable the delivery of sustainable development.</p>
138	261	Green Infrastructure	<p>The County Council supports the aims of the GI provision as stated in paragraphs 10.3, 10.4 and 10.5. With regard to the Ribble Coast and Wetlands, paragraph 10.5 of the DPD refers to the protection and enhancement of the Ribble Coast and Wetlands Area (RCWA). The RCWA is not referred to elsewhere in the DPD document or any DPD policy. A policy for the RCWA would be welcomed alongside an indicative boundary for the area. The County's Environment &amp; Community Projects team are currently reviewing the County wide RCWA area and will work alongside SRBC and other organisations to aid its enhancement as a green infrastructure and green tourism asset.</p>
138	262	Chapter G - Policy G6	<p>The County Council supports Policy G6. This allocation is located in the area of the former Lower Ribble Countryside Management Area, which the County has been involved in managing and enhancing.</p>
138	263	Chapter G - Policy G7	<p>The County Council supports Policy G7 and the allocation/protection of County's Environment &amp; Community Projects sites - Paradise Park and Lostock Hall Engine Sheds.</p>
138	264	Proposals Map	<p>The Proposals Map identifies SSSI, BHS, GHS (LGS) and LNR but not the internationally important Natura 2000 site: Ribble &amp; Alt Estuaries.</p>
139	265	Chapter D - Policy D1 - Sites M, V & X	<p>Introduction These representations have been prepared by Lea Hough on behalf of the landowners of the above sites; they are supplementary to those submitted on the preceding 'Issues and Options' and 'Preferred Options' documents. The enclosed plan illustrates the extent of ownership of each landowner; the parties include the Trustees of Kitty's Farm (Yellow), Mr and Mrs M.J. Gould (Blue), Young / Kirkpatrick (Red) and European Real Estate (Green). As is evident from the plan the sites share a direct physical relationship with one another and as such an opportunity exists to adopt a collaborative strategic approach to development to bring the site forward progressively and coherently. It is within this context that the representations are presented; the sites will herein collectively be referred to as</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>'the site'.</p> <p>The Site Allocations and Development Management DPD Publication document proposes to allocate the site for residential development under Policy D1: Allocation of Housing Sites (albeit under individual allocations). The proposed allocation of the site is strongly supported as is the phasing schedule outlined in Policy D2: Phasing, Delivery and Monitoring. The delivery of this site in the short term will help to facilitate the sustainable and managed housing growth in Longton and assist the Council in meeting its housing requirement over the remaining years of the first phase 2010 – 2016.</p> <p>The purpose of these representations is twofold. Firstly, it is to reinforce the rationale for the site to be carried forward as a residential allocation within the Site Allocations and Development Management DPD Publication document. Secondly, they support the phasing schedule for the release of the site for development and highlight that on-site delivery could be brought forward. In support of the above, these representations will:</p> <ol style="list-style-type: none"> <li>1) Reiterate the importance of the site to the managed delivery of housing growth set out in the adopted Central Lancashire Core Strategy DPD;</li> <li>2) Detail why the site is suitable, available and deliverable for residential development; and</li> <li>3) Explain why the proposed phasing schedule must be revised in order to secure sustainable and managed growth in Longton and to assist the Council in meeting its housing requirement over the remaining years of the first phase 2010 – 2016.</li> </ol> <p><b>Managed Delivery of Housing Growth</b></p> <p>The Central Lancashire Core Strategy DPD sets out the position with regard to housing growth and distribution across the three local authority areas of Preston, South Ribble and Chorley. Policy 1: Locating Growth, sub – section (e), stipulates that:</p> <p>'Limited growth and investment will be encouraged at the following Rural Local Service Centres [RLSC] to help meet local housing and employment needs and to support the provision of services to the wider area:</p> <ol style="list-style-type: none"> <li>i. Brinscall / Withnell</li> <li>ii. Eccleston</li> <li>iii. Longton'</li> </ol> <p>Policy 4: Housing Delivery applies a minimum requirement across all three local authority areas of 22,158 dwellings over the 2010 – 2026 plan period. The likely distribution of this housing growth (based on the potential for housing development in each place and not the proportions required to be met) is set out in Table 1 in Chapter 5. This shows that the RLSCs and 'elsewhere' locations are predicted to provide 8% (c. 1700 dwellings) towards the minimum requirement set out in Policy 4: Housing Delivery.</p> <p>In order to facilitate a degree of management of housing growth within RLSCs, as set out in Table 1, the Chorley Borough Council Site Allocations and Development Management Policies DPD – Preferred Options document and South Ribble Borough Council Site Allocations and Development Management Policies DPD – Publication document include allocations for a total of 349 dwellings within the RLSCs (Brinsall / Whitnell (9), Eccleston (119) and Longton (221)). As these figures indicate, Longton contributes significantly to the proportion of allocated housing growth predicted to be accommodated within the three RLSCs (i.e. 63%). If considered further, it is apparent that the site contributes the majority of allocated dwellings in Longton (211 of the 221 dwellings). Within the context of the total number of dwellings allocated for the RLSCs (i.e. 349), the site therefore contributes 60% of the dwellings.</p> <p>From the above, it is clear that the site is integral to securing the managed delivery of housing growth within the RLSCs and the settlement of Longton itself. This importance derives from the fact that each of the RLSCs is constrained by tight settlement boundaries and surrounded by green belt; Longton is the only one of the RLSCs with a large amount of land available within the settlement envelope to accommodate development, and of that land available, the site represents the most appropriate location for development, as detailed in the next section.</p> <p><b>Suitability, Availability and Deliverability</b></p> <p><b>Suitability</b></p> <p>The site is located within the settlement boundary and in close proximity to Longton village centre, the facilities found therein, as well as good public transport links to the surrounding areas. Indeed, the Sustainability Appraisal of the Site Allocations and Development Management recognises that the site achieves good scores against strategic planning and sustainability indicators, including access to transport modes, recreational facilities and employment opportunities. As recognised in Policy 1, sub-section (e), of the Central Lancashire Core Strategy DPD, housing growth in Longton would support and protect the long – term viability of such services and facilities.</p> <p>Development of the site for residential use, at a fairly low density, would be wholly compatible with the adjoining existing housing and the character of the settlement as a whole. Access to the site could be readily achieved from Chapel Lane via Longton Hall Court and School Lane via Old School Lane,</p> <p>Bringing the site forward within the context of a strategic master plan would facilitate:</p> <ul style="list-style-type: none"> <li>• An integrated movement strategy;</li> <li>• A structural landscape framework (incorporating existing and new tree and hedgerow planting) to enhance the relationship of the development with the greenbelt and the listed Longton Hall;</li> <li>• A comprehensive approach towards the delivery of utilities infrastructure;</li> <li>• An efficient use of land through a development layout responsive to the physical context of the site; and</li> <li>• A high quality of urban design through consistency in the use of materials and architectural detailing on both properties and the public realm.</li> </ul> <p>In addition to supporting the services and facilities within Longton, development of the site has the potential to deliver wider benefits such as the diversification of housing stock, the provision of</p>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>affordable housing and contributions to local infrastructure schemes.</p> <p><b>Availability</b> Each site is under different ownership. However, all parties are free, willing and motivated to release their site for development at the earliest possible opportunity – as demonstrated through representations on the preceding ‘Issues and Options’ and ‘Preferred Options’ documents and through this expression of strong support for the proposed site allocation.</p> <p><b>Deliverability</b> There are no physical constraints that would preclude the site from coming forward for development. For example, it does not fall within a flood risk area, there is unlikely to be any significant ground contamination issues, access can be readily achieved, there are no adjacent generators of adverse amenity impacts (i.e. noise / air quality) and there are no designated ecological assets. Subject to the grant of planning permission the sites could be brought forward for development without delay.</p> <p><b>Phasing Schedule</b> The housing allocations in the Publication Site Allocations DPD support and interpret the policies of the Core Strategy. The document currently allocates land to accommodate 4,108 dwellings over the plan period (2010 – 2026) which, when added to sites with planning permission, sites with current applications, and ‘other sites’ provides a total supply for the entire plan period of 6,962 units. Table 2 of the document identifies 3 phases for the housing delivery. The first phase is six years and runs from 2010 to 2016. For this first period, 2,712 dwellings are phased for delivery that is equivalent to 452 dwellings per annum. The housing requirement for South Ribble is 417 dwellings per annum and the SHLAA Update confirms that at March 2011, there was a shortfall against this target of 313 dwellings. Paragraph 7.14 confirms this shortfall will be made up over the first phase. The effect of this would be to increase the 5 year requirement to 480 dwellings per annum <math>([417 \times 5] + 313)</math> resulting in a 5-year requirement of 2,398 dwellings. Paragraph 47 of the NPPF confirms the adopted housing requirement should include a 5% buffer or a 20% buffer of additional sites, depending on whether there has been ‘persistent under delivery’. South Ribble has not met the RSS annual housing requirement since the period 2005 – 2006 and it can be rationally concluded that a 20% buffer is therefore the most reasonable target for the Council. Indeed this is acknowledged in Policy D2, which states: ‘...Annual Monitoring of the delivery of housing will be undertaken. It will include a review of Sites and Phasing within Table 2 and aim to ensure that a 5 year supply (including a 20% buffer if appropriate, and if performance approves, the Council will look at reducing the buffer to 5% as part of the monitoring process)...’ With a base date of March 2011, the effect of the 20% additional buffer is to increase the 5- year housing requirement to 2815 dwellings <math>([417 + 20\%] \times 5) + 313</math>, which is equivalent to 563 dwellings per annum. Therefore, the overall effect is that the supply of 2,712 dwellings identified in the Publication document would only provide 4.8 years supply against the 5 year requirement (which is 2,815 dwellings). If compared to the 2011 SHLAA Update (the common base date for assessment, as information to March 2012 is not available), a supply of just 2,538 dwellings, is identified which is equivalent to just 4.5 years. In light of the Council's evidence, and the resulting decision, in respect of the recent appeal at New Longton (APP/F2360/A/12/2168530/NWF), it is now a matter of record that SRBC accept that the full 20% uplift is applicable Paragraph 7.13 of the consultation document states some flexibility of supply may be available by virtue of accounting for 45 windfall dwellings per annum. However, this is only suggested as an ‘indicative total’, whereas paragraph 48 of the NPPF is clear that such an allowance should only be made if there is compelling evidence that sites have consistently become available and will continue to provide a reliable source of supply. The Council has not provided the ‘compelling evidence’ required to support a windfall allowance in the first 5 years of the plan. The sites allocated and phased by Policies D1 and D2 are therefore insufficient to meet the remaining requirements of the first phase (2010 – 2016). In order to make Policies D1 and D2 sound, it will be necessary to identify additional deliverable land in the remaining 5 years of Phase 1 (i.e. April 2011 – March 2016), sufficient to provide for 2,815 units (417 annual requirement + NPPF 20% x 5 years + 313 undersupply). It is notable that paragraph 7.14 of document states that the shortfall at April 2012 has increased further to 560 dwellings. This demonstrates the situation of undersupply is continuing. This further emphasises the need to bring forward sites now. The site is suitable, available and readily deliverable and can assist the Council in meeting its housing requirement over the first phase 2011 – 2016.</p> <p><b>Longton Allocations Phasing</b> 2010 – 2016 2016 – 2021 2021 – 2026 Q 10 - M, V and X 128 83</p> <p>Additionally, there are several other reasons to support the phasing schedule. Further to Policy 1: Locating Growth, sub – section (e), of the Central Lancashire Core Strategy DPD, Paragraph 7.36 of the Site Allocations and Development Management DPD Publication document recognises that new development in the village is important to maintain its viability and support the services it provides in its role as a RLSC. The proposed phasing schedule consolidates this objective. The proposed weighting of housing delivery in Longton to the earlier phase, grants the opportunity to realise benefits to the sustainability of the settlement. For example, there is little population growth / diversification to maintain and enhance the viability of existing services and facilities (or to support the provision of new) and there is little scope to secure contributions towards affordable housing and local infrastructure schemes through planning gain, particularly as infill / small scale developments invariably fall below the thresholds for provision. This latter constraint is of particular relevance as house prices in Longton are high by virtue of its rural location and there is an acute shortage of affordable housing to meet local needs. Bringing development of the site forward into the earlier phases of the plan period facilitates the delivery of such benefits and enable the settlement to strengthen its role as a RLSC.</p> <p>In order to secure sustainable and managed growth in Longton and to assist the Council in meeting its housing requirement over the remaining years of the first phase 2010 – 2016 the proposed phasing schedule is supported. As detailed previously, the site is suitable, available and readily deliverable so this approach could realistically be adopted. To provide for a degree of managed</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>delivery in RLSCs in Phase 2021 – 2026 potential allocation of safeguarded land outside the settlement boundary of Ecclestone could be explored in liaison with Chorley Borough Council.</p> <p>Conclusion The proposed allocation of Sites M, V and X for residential use under Policy D1: Allocation of Housing is strongly supported. The allocations are justified because the sites are integral to securing the managed delivery of housing growth within the RLSCs and the settlement of Longton and they are wholly suitable, available and deliverable.</p> <p>Although the sites are allocated separately they share a direct physical relationship and as such an opportunity exists to adopt a Masterplan approach that enables the land to be developed progressively. This could ensure that the development of individual parcels is achievable without preventing or prejudicing the delivery of future phases of the site.. All landowners are free, willing and motivated to release their interest and such an approach could be readily achieved.</p> <p>The proposed phasing schedule for the release of the sites for development outlined in Policy D2: Phasing, Delivery and Monitoring will facilitate sustainable and managed housing growth in Longton (enabling the settlement to benefit from population growth / diversification and contributions towards affordable housing and local infrastructure schemes through planning gain) and assists the Council in meeting its housing requirement over the remaining years of the first phase 2010 – 2016</p>
140	266	Chapter D - Policy D1	<p><b>1 INTRODUCTION</b> 1.1 These representations to the South Ribble Site Allocations and Development Management Policies Development Plan Document (DPD; Publication version July 2012) are submitted on behalf of Gorrie Ltd. Our client owns the vast majority of the land off Wesley Street (ref: R) in Bamber Bridge, with the exception of the limited areas occupied by the McKenzie Arms public house and the section of the playing field to Cuerden Church School.</p> <p><b>2 POLICY D1: ALLOCATION OF HOUSING LAND</b> 2.1 Our client supports the allocation of the land off Wesley Street in Bamber Bridge for housing. The National Planning Policy Framework (NPPF) contains a number of tests for proposed site allocations and this site meets each one of these and is therefore appropriate for housing development. 2.2 Firstly, the site is available to contribute to the 5 year supply of housing land. The owner of the site is currently preparing an outline application for its redevelopment for housing. There are no issues which will restrict the redevelopment of the site. This is highlighted by the Sustainability Appraisal of the DPD undertaken by the Council in which the only potential issue to arise is that of contamination. However, it is also recognised that this can be addressed through ground preparation and remediation. 2.3 Secondly, it offers a suitable location for housing development as there are existing residential areas to the north and west. It is a brownfield site within the urban area of Bamber Bridge, close to the town centre and local services and facilities. It currently contains the vacant Wesley Mill and pub which have a negative impact upon the area; as recognised in the DPD, the comprehensive redevelopment of the site will help to address these issues. 2.4 Within the Sustainability Appraisal the site scores well against the criteria and states that it “and has good access to transport links and local services”. It adds that “the site scores well on ecological grounds as there would be no detrimental impact”. 2.5 Thirdly, it is achievable with a realistic prospect that housing will be delivered on the site within five years. As stated above, the owner is to pursue an outline application in the near future. If planning permission is gained for this and a subsequent reserved matters application, then the first housing could be commenced on the site by late 2013. The Sustainability Appraisal also states that the site is deliverable. 2.6 The site is included in the Strategic Housing Land Availability Assessment. The Council lacks a 5 year supply of housing, and the supply which is identified includes 50 completions from the site; in reality this could be more within this period. 2.7 Finally, redevelopment of the site is viable providing the mill is demolished. The mill is not listed, has been derelict for a number of years and has fallen into disrepair. Re-using the building would be expensive and would render the redevelopment of the site financially unviable. In any case, the buildings are unlikely to be suitable for future employment use. The building does not meet modern requirements for employment use and has proved difficult to let. Paragraph 22 of NPPF states that local authorities “should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose”. 2.8 It is clear that the Council is strongly supportive of the site’s regeneration. It has resolved to proceed with a ‘Brief for Developers’. This highlights the support of the Council for the site’s redevelopment as the draft version of the brief states that “The site of the Wesley Street Mill has been identified as a Council priority for redevelopment which can contribute to achieving the Council’s regeneration objectives.” It adds that the primary aim is “to address the current dereliction of the site of the mill, to improve the physical environment in Bamber Bridge and to create attractive desirable housing to support the working population of the borough.” 2.9 Within the Central Lancashire Core Strategy which is nearing adoption, Policy 1 identifies Bamber Bridge as a location where growth and investment will be focused with an emphasis on regenerating brownfield sites. In discussing older employment premises (such as former mills), paragraph 9.7 recognises that some of these “will be at the end of their useful life as commercial buildings for various reasons and may be more appropriately redeveloped for other uses.”</p> <p><b>3 SUMMARY</b> 3.1 It is the owner’s intention that the site will be brought forward for redevelopment in the near future and it meets the tests for housing allocations within NPPF by being available, suitable, achievable and viable. 3.2 The site is an integral component of housing land supply and its redevelopment for housing is in line with the Core Strategy. 3.3 It is therefore clear that the site is appropriate for future housing development and should therefore be allocated as such in the DPD.</p>
141	267	Chapter C - Policy C3 - Site W	This is a strong objection to the proposed development site, it is not appropriate for the area and would create a completely different atmosphere to the one enjoyed by current residents.

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>It would;</p> <ol style="list-style-type: none"> <li>1. Increase traffic</li> <li>2. Cause risk to road safety (especially on moss lane)</li> <li>3. Change of character to a lovely area</li> <li>4. Loss of wildlife ecosystem</li> <li>5. Loss of land drainage on the fields</li> <li>6. Loss of house value as these houses in this area are attractive due to their rural location.</li> </ol> <p>It seems this is an unnecessary building project and has little support and lots of opposition.</p> <p>There are many people in the area that feel south ribble council are not listening to the residents perspectives after the waste disposal plant which has caused so many problems e.g. air pollution. I believe this is now in the hands of a legal team I think it is important to consult with people properly on any future developments and I found out about this proposal via word of mouth which is not very good.</p> <p>This housing proposal looks to me like it will fulfil government targets to create spaces for villages rather than an actual established need for housing. There are lots of houses for sale in Leyland and Buckshaw village which would fulfil this type of housing need.</p>
142	268	Chapter C - Policy C3 - Site W	<p>Document Allocation</p> <p>The above site has been identified as having potential for residential development, beginning in the first phase (2010-2016).</p> <p>Representation</p> <p>The land comprises of the majority of the land formed by the man-made boundaries of Heatherleigh to the south, Croston Road to the west, Bannister Lane to the north and Flensburg Way to the east. As such, it is an excellent opportunity to appropriately and suitably infill what is already an area of relatively comprehensive residential development.</p> <p>The land has previously been allocated as Safeguarded for future development in the South Ribble Local Plan. The land, therefore, has long since been identified as potentially suitable for the delivery of residential development and it the landowners view that it is now an appropriate time for the site to be brought forward to that end.</p> <p>Leyland, identified in the Core Strategy as a Key Service Centre, is a location where investment and development is to be concentrated and consequently the allocation is in accordance with this strategic aim.</p> <p>The landowners believe that the Croston Road site is in accordance with the Core Strategy and the key principles of the NPPF. It is deliverable in the short term and as such the proposed phasing of development is supported. The allocation of the site for residential use is also strongly supported.</p> <p>Delivery</p> <p>The land is wholly controlled by two entities, the Homes and Communities Agency and a Consortium of landowners. Both parties are wholly committed to pursuing an appropriate allocation and subsequent development of the land and should be considered as working in partnership for the promotion and delivery of the site. In order to ensure that the land is deliverable and achievable within the Plan period the landowners have already instructed considerable resources to ensure that development of the land can be facilitated. To date, there appears to be no physical, environmental or technical reasons as to why the site cannot be brought forward.</p> <p>The land can deliver a significant number of houses for both the open market and the social requirement in an attractive environment. Initial Masterplanning has indicated delivery of approximately 300-350 units, combining a good mix of house types, ranging from relatively urban to more rural, looking to take advantage of the surrounding character.</p> <p>There are several opportunities to access the site from Heatherleigh, Croston Road and Bannister Lane, ensuring permeability throughout the site with a multi-access solution. All access points are wholly controlled by either the HCA or the Consortium and therefore can be delivered.</p> <p>Summary</p> <p>The site has been the subject of significant technical investigation and Masterplanning work. The results of these have been discussed with South Ribble and the proposals developed as such. The work to date has demonstrated the deliverability and feasibility of the site, underpinning its allocation for residential development.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>A public consultation event has been recently undertaken and the comments received will be incorporated into the proposal where possible. The inclusion of public participation is also in line with local and national policy.</p> <p>The Masterplan shows a sustainable grain of development, retaining existing natural features wherever possible and incorporating significant areas of green space into the proposal. Masterplanning good practice has been used in conjunction with policy guidance and the natural opportunities of the site to create a sustainable and suitable Masterplan.</p> <p>Along with the technical investigations that have been undertaken to date, this shows that there are no underlying issues that preclude development of the site. As such, the phasing programme of the DPD, showing delivery in the 2010-2016 and 2016-2021 period, is considered to be robust and sound.</p> <p>The site should be considered as suitable, available and achievable and therefore strongly support the proposed allocation.</p>
143	269	Chapter C - Policy C4 - Cuerden Strategic Site	<p>Jones Lang LaSalle is Lancashire County Council's appointed advisor for the Cuerden Strategic Site. In this capacity Jones Lang La Salle makes the following representations to the South Ribble Publication Site Allocations Development Plan Document.</p> <p><b>Background and Context</b>  The Cuerden Strategic Development Site ("Cuerden") extends to 65 hectares and is strategically located at the junction of the M6, M61 and M65 and 4.5 miles south of Preston City Centre. A Plan of the site, showing the Lancashire County Council Assets in blue, is enclosed.  Lancashire County Council acquired approximately 44 hectares of the Site from the Homes and Communities Agency in January 2012. The remainder of the site is in private ownership.</p> <p>The Cuerden Strategic Site was identified in the South Ribble Local Plan as a major inward investment site for high technology industrial and business development. The Site is currently one of 4 Strategic Sites identified in the adopted Central Lancashire Core Strategy (July 2012) which states (paragraph 5.34):</p> <p>'This site [Cuerden Strategic Site] contributes significantly to the portfolio of sites in Central Lancashire. It is large enough at 65 hectares to attract a major employer and contribute to the development of the high quality manufacturing uses and knowledge-based industry. This will help to provide high skilled jobs for Central Lancashire's workforce and the wider sub-region. A new major road access is required that can also handle Preston and Leyland bound traffic. In addition public transport accessibility needs to be provided possibly enabling passengers to interchange services as well as use a park and ride facility.'</p> <p>The Core Strategy indicates that implementation proposals for the Strategic Locations are intended to be addressed in the Site Allocations Development Plan Documents or Individual Area Action Plans (AAPs).  Overall, Lancashire County Council support the allocation of the Cuerden Strategic Site as a major site for employment led development within the Publication Site Allocations and Development Management Development Plan Document - The development of the Cuerden site will represent the single largest development undertaken by the County Council for 20 years, contributing to the growth of the Lancashire economy by attracting significant investment and job opportunities to the County.  However, the County Council is keen to ensure that the delivery of the site is not unduly constrained by the need for a masterplan for the comprehensive development of the whole site. Specifically, we request that the Development Plan Document provides sufficient flexibility for phased development of parts of the land on a stand-alone basis, but as an integrated part of the development of the wider site.</p> <p>The County Council considers that this will allow enabling development to deliver growth and jobs at an early stage and facilitate the development of the remaining plots as part of the wider vision/policy objective for the Cuerden Strategic Site.</p> <p>Our representations are set out below.</p> <p><b>Policy C4 &amp; Justification</b></p> <p>Lancashire County Council support the allocation of the Cuerden Strategic site as a major site for employment led development and in particular the recognition within paragraph 6.29 that it is the intention of the County Council and South Ribble Borough Council to accelerate the development of this site. This approach accords with National Planning Policy Framework which states (Paragraph 19) that 'The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.'</p> <p>Paragraph 21 of the National Planning Policy Framework states that 'Investment in business should not be over-burdened by the combined requirements of planning policy expectations.'</p> <p>In respect of part a) of Policy C4 we are therefore concerned that that the need for an agreed comprehensive masterplan to be in place could slow the rate at which development would come forward and could place additional financial burdens on development.</p> <p>In light of the above, we request that the term "comprehensive" is removed and replaced with the term "integrated" as this better describes an appropriate phased approach for Cuerden. The</p>



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			<p>word "comprehensive" should also be removed from paragraphs 6.29 and 6.31 of the justification for the same reason.</p> <p>Describing the development of the Cuerden Strategic Site using the word 'comprehensive' rather than 'integrated' could potentially slow the rate of development and impose additional financial burdens upon the landowner which is 'unsound' because it would run counter to paragraph 21 of NPPF.</p> <p>In our experience early phases of enabling development often need to be brought forward to facilitate development and investment in strategic sites. To be effective and commercially sound Policy C4 therefore needs to be flexible and deliverable over the plan period.</p> <p>We are also concerned that Policy C4 is not clear on what form an agreed masterplan, phasing and infrastructure delivery schedule will need to take, who this will be prepared by and how it will need to be agreed. The need for a Supplementary Planning Document would, for example, be particularly onerous if requested at a later stage. We request that the Council takes a flexible approach given different ownerships and interests across the Cuerden site.</p> <p>We do not consider that this flexible approach would prejudice the wider policy objective for a planned approach to the redevelopment for the Cuerden Strategic area in any way. On the contrary it would facilitate its delivery.</p> <p>The wording in Policy C4 that "Alternative uses may be appropriate where it can be demonstrated that they may help deliver the strategic employment aspirations for this site" is supported. However, the wording of the justification in paragraph 6.27 and 6.31 should be changed to refer to alternative uses acting as "enabling development" as it is considered that this would improve the prospects of delivering the strategic employment aspirations for this key site.</p>
144	270	Chapter C - Policy C3 - Site W	<p>I have struggled to use your website i find it not very user friendly so i am emailing you as i wish to oppose the master plan of 650 houses to be built between heatherleigh and moss lane. the lateness of the email is due to the fact that most of the residents in this area do not know about this plan.</p> <p>The main reason for my objections are  increase in traffic  possibility of devaluation of property which has already occurred due to the waste plant so you are making it an impossible task to sell  i am concerned about the risk of more surface water run off due to the fact my house already flooded this year. I feel the river lostock will also not be able to cope with any more water which will cause a very big risk to all the residents on bispham ave and put them in danger. i can produce pictures of how high the river got if needed.  It will also ruin the landscape and i am sure there are other areas in leyland where this can go i think we have had our fair share with the waste plant being built which is still on going with problems.  i am worried about the school situation i have to young children and i do not want to have difficulty getting them in to local school because new houses means people with children which could potentially lead to over crowding in schools.</p>
145	272	Chapter D - Policy D1 - Site H - Vernon Carus	<p>LATE SUBMISSION</p> <p>Bovis Homes support the reaffirmation that the Vernon Carus and associated land at Factory Lane, Penwortham (Site H) forms part of the housing land supply for South Ribble Borough.</p>
145	273	Chapter D - Policy Policy D1 - Paras 7.26 to 7.27	<p>LATE SUBMISSION</p> <p>Despite previous representations which have not been addressed, Bovis Homes object to two matters where changes to the text are required to ensure a sound context for the delivery of the site. The previous response was:  The details in this representation are the subject of extensive joint working with the developers of the Vernon Carus site, and also with the owners of the adjoining Lostock Hall Gasworks site. The Council remains optimistic that partnership working will secure the development of this site.</p> <p>Although Bovis Homes' support the sentiment and wish to continue negotiations there is a need to deliver the required housing now (the first units being part of the housing trajectory for 2010-2016 – Table 2) based upon the alternative options which have been presented to South Ribble Borough Council. The National Planning Policy Framework states that:  Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible.  Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area. (paragraph 187)</p> <p>As drafted, the matters raised in paragraphs 7.26 and 7.27 create problems rather than providing solutions.</p> <p>Vehicular Access</p> <p>The restricted height of the railway bridge referred to in paragraph 7.27 would not preclude traffic associated with the development of the site for residential purposes. Paragraph 4.28 of the extant South Ribble Local Plan identifies that the restricted height of this bridge was causing difficulties for traffic serving the former Vernon Carus factory, principally access by heavy good vehicles, rather than cars which would normally access housing.</p> <p>The Local Plan recognises that, in addition to Factory Lane, there is an acceptable access to the site from a new road with a junction on Leyland Road. Nothing has materially changed with the</p>

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			<p>surrounding highway network which justifies the suggestion at paragraph 7.27 that access ‘will be from the Cross Borough Link Road, subject of Policy A1’.. Further, even if there is a suggestion that there has been a change (which is not accepted by Bovis Homes), any the residual cumulative impacts would not be of the severity that would, according to paragraph 32 of the National Planning Policy Framework, prevent development on transport grounds.</p> <p>An alternative and appropriate means of access does exist which should not be precluded by this Development Plan Document, particularly in circumstances where it is evident that a robust mechanism does not exist for the delivery of the Cross Borough Link Road (CBLR) which does not result in an inappropriate 3rd party ‘ransom’ situation arising. Indeed, it is suggested that the approach in the Publication document is contrary to the aims of the National Planning Policy Framework where ‘Plans should be deliverable. Therefore, the sites and scale of development identified in the plan should not be the subject to such a scale of obligations and policy burdens that their ability to be developed viability if threatened’ (paragraph 173). Although cost is not the issue because Bovis Homes has offered to provide funding for the CBLR, the parallel here is the intended policy burden associated with the access requirement which is unnecessary.</p> <p>If access is not taken via the CBLR then any financial contributions being sought would currently not meet the statutory tests identified at Article 122 of the Community Infrastructure Regulations 2010 (see also the objection to Policy A1). The contributions would not be necessary to make the development acceptable in planning terms; directly related to the development nor fairly and reasonably related in scale and kind to the development.</p> <p>As part of the planning application process, Bovis Homes have suggested various constructive approaches which could be adopted to deliver the access desired by the Borough Council via the CBLR. The Borough Council has to date chosen not to adopt one of these approaches and, accordingly, the delivery of this longstanding housing allocation by Bovis Homes should not be prevented by the inactivity of others when there is an alternative, appropriate and deliverable vehicular access strategy for this housing site and extant planning applications are before the Borough Council for determination.</p> <p>Accordingly, the reference in paragraph 7.27 to the access being from the CBLR should be deleted and replaced by ‘Access shall be provided in a manner which does not cause has severe residual cumulative impacts on the local highway network’.</p> <p>Open Space</p> <p>Bovis Homes do not object to the principle of the provision of areas of open space especially where the land falls within the Green Belt. However, unless there are exceptional reasons (e.g. relocation of a particular user), it is not the purpose of the development plan process to determine who should manage or occupy the open space which is to be provided. It would be unlawful that a site allocated for a superstore within a town centre is specifically identified for occupation by say Tesco or Morrisons.</p> <p>Although Bovis Homes is sympathetic to, indeed supportive of, the aspiration to secure the long term future of the former Vernon Carus Sports Club, it is inappropriate for the emerging development plan document to explicitly refer to the development of this longstanding allocation to ‘include measures to secure the future of the existing sports club north of Factory Lane’ (paragraph 7.27). The specific identification in a Development Plan Document of an ‘end user’ in this case is not necessary to make the development acceptable in planning terms and there is not a (nor should be) specific policy requirement in development plan document. This is a matter where the development plan process should only identify land for open space use (which is reflected in the extant planning application) and the precise nature, use and occupier are matters for negotiation as part of the development management process.</p> <p>Accordingly, this paragraph should be amended by deleting the last sentence and replacing it by ‘The development will include the provision of open space to the north of Factory Lane’</p>
145	274	Chapter D - Policy Policy D1 - Paras 7.26 to 7.27	<p>LATE SUBMISSION</p> <p>Bovis Homes support the reaffirmation that the Vernon Carus and associated land at Factory Lane, Penwortham (Site H) forms part of the housing land supply for South Ribble Borough. The planning merits associated with the location of the site are generally identified in the Publication document. Further , a long outstanding planning application has been submitted to the Borough Council for the residential development of this land which has remained undetermined for a period of approximately 4 years whilst the remaining buildings ‘are increasingly falling into further disrepair’. (paragraph 7.26),</p>
145	275	Chapter A - Policy A1	<p>LATE SUBMISSION</p> <p>Bovis Homes objects to Policy A1. The principle of contributions, whether as part of a Planning Obligation or eventually in the form of payment pursuant to the Community Infrastructure Levy, is acknowledged. However, as drafted this policy is somewhat ambiguous and may well be contrary to the Community Infrastructure Levy Regulations 2010 (as amended).</p> <p>The first matter is that there is a need for this policy to be clear that any contributions must meet the statutory tests in Article 122 of the Regulations. Reference should be included to the requirement that any Obligation must be</p> <p>(a) necessary to make the development acceptable in planning terms;</p> <p>(b) directly related to the development; and</p> <p>(c) fairly and reasonably related in scale and kind to the development.</p> <p>An additional paragraph is required to state:</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>In negotiating any agreement or obligation the Council will ensure that it meets the requirements of Article 122 of the Community Infrastructure Levy Regulations 2010 (as may be amended)</p> <p>The second matter concerns the last paragraph. Bovis Homes welcomes the comment that the provision of the necessary infrastructure on-site funded by the developer will be taken into account. However, once the CIL charging schedule has been adopted this approach, unless it is 'land in-kind' being offered by the Developer, will not be acceptable. Accordingly, there is a need for the last paragraph to be amended by including the following caveat at the start: Until the adoption of the CIL Charging Schedule</p> <p>Taking into account all these matters, there is a need for the Development Plan Document to articulate more clearly how key items of infrastructure which either falls across 2 or more sites or funded via the charging of the Community Infrastructure Levy are to actually be delivered. This matter is not adequately addressed by Policy 2 of the adopted Central Lancashire Core Strategy (July 2012). Failure to identify a robust delivery mechanism (i.e. how to unblock an evident infrastructure constraint) should be addressed.</p> <p>Finally, notwithstanding the objections to the legal drafting of this policy, if the Developer is to provide the necessary infrastructure on-site then this should be clearly specified in the relevant policies for the allocations which have been identified in the Development Plan Document. The last paragraph of Policy A1 can then be transparent and refer to the infrastructure being matters listed in the relevant site specific policies. The suggested amendment is: Infrastructure which may be provided by developers has been identified as part of the relevant site-specific policies contained in this Development Plan Document.</p>
145	276	Chapter C - Policy C1 - Pickering's Farm	<p>LATE SUBMISSION</p> <p>Bovis Homes do not object to the principle of the proposed Pickering Farm allocation but do object to the policies lack of clarity. There are concerns about the delivery of this allocation which is dependent upon the construction of the Cross Borough Link Road (CBLR).. When this comment was previously made South Ribble District Council responded that: The delivery of the section of the link road through this site is a key requirement of the development, and is written into the policy relating to this site.</p> <p>However, as is self-evident, the provision of the delivery of the CBLR is not part of Policy C1 but is only referred to at paragraph 6.9 of the Publication document. As suggested in Bovis Homes' objection to Policy A1, there should be explicit reference to this item of infrastructure being delivered by the developer forming part of the site-specific policy.. Infrastructure which may be provided by developers has been identified as part of the relevant site-specific policies contained in this Development Plan Document.</p>
145	277	Chapter D - Policy D2	<p>LATE SUBMISSION</p> <p>Objection is made by Bovis Homes to the suggested phasing in Table 2 and reflected in Policy D2 which does not reflect the longstanding allocation of the Verson Carus site and associated land at Factory Lane, Penwortham (Site H) for housing development and the outstanding planning application which has been submitted to the Borough Council for the residential development of this allocated site that has remained undermined for a period of over about 4 years. The site is capable of delivering more than 50 dwellings during the period up to 2016 if the current application is determined together with the alternative acceptable and deliverable access in circumstances .</p> <p>It is relevant to note that the response to Bovis Homes' previous representation was that Following the recent update of the SHLAA evidence of housing availability in February 2012, the Council has revised the phasing and delivery of the Vernon Carus site, as set out in Table 2 of the DPD.</p> <p>Instead of revising the capacity upwards for the period 2010 to 2016 (which is what Bovis Homes' proposed assuming the current longstanding application was expediently approved), the Publication document has reduced the number from 75 to 50 dwellings. This suggests that the Borough Council accepts the thrust of Bovis Homes' general concerns about reliance being placed on access to the site solely from the Cross Borough Link Road but is not willing to adopt the alternative approaches that exist and are acceptable in highway terms. Accordingly, rather than looking for solutions and working positively (as required by paragraph 187 of the National Planning Policy Framework) the Borough Council is maintaining its unjustified and dogmatic position which is what is creating the problem and is seeking to crystallise this position via this Development Plan Document.</p> <p>Table 2 should be amended to include at least 100 dwellings being delivered during the period 2010 to 2016.</p>
145	278	Sustainability Appraisal	<p>LATE SUBMISSION</p> <p>Although it is noted that a similar approach to the Central Lancashire Core Strategy has been adopted, the Sustainability Appraisal of the Publication document is flawed. The Appraisal has no regard to extant national planning policies and requirements as contained in the National Planning Policy Framework and accompanying Technical Guidance. Reference is made to document which, as indicated in Appendix 2 to the Framework, have been replaced. The Appraisal therefore needs to be amended and updated to reflect current national policies and requirements rather than rely on documents which no longer have any status.</p>
145	279	Chapter D - Policy D1 - Table 2	<p>LATE SUBMISSION</p> <p>Objection is made to the suggested phasing of the Vernon Carus which does not reflect either the longstanding allocation of the land for housing development or the outstanding residential planning application has been submitted to the Borough Council that has remained undetermined for a period of approximately 4 years. More than the suggested 50 dwellings could be delivered on this site before 2016 if the outstanding application is determined. See also the representation to Policy D2.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			Table 2 should be amended to include at least 100 dwellings being delivered during the period 2010 to 2016
146	280	Chapter A - Policy A1 - Developer Proposals	<p>A1 Section C :Please ensure all references to development of footpaths, cycle ways refer to multi-user paths which include Bridleways as is mentioned in section 6.11 – but should be referred to whenever footpaths and cyclways are mentioned across the whole borough.</p> <p>Other sections where bridleways are overlooked include 9.18, 10.51,10.57,10.42 and others</p> <p>Bridleway provision is an increased requirement considering Road safety - this will become more of a problem given the proposed developments and associated increase in traffic – particularly Moss Side and test track area.</p> <p>Increasing number of horses in area as has been supplied to yourselves on a separate document – currently around 400 horses in Moss Side , Ulnes Walton, Hoole and Longton areas – showing an increase from approx 250 only 5 years ago – need increased provision on sport and recreation basis.</p> <p>Also satisfies requirements in Policies 23,24, and 25</p>
147	281	Chapter C - Policy C1 - 6.11 section 106 monies	<p>Please consider allocation of section 106 monies directly to the local area in which the development takes place – e.g. Moss Side Test Track monies allocated to the immediate area in provision of green space, footpaths, bridleways and cycle tracks etc around the development – money should not be used in other areas of the borough, but should be used to help ‘ease’ the disruption caused to local residents by the development</p> <p>Ulnes Walton Bridleways Association has serious concerns over road safety in the area – this will be significantly increased during and after the developments.</p> <p>Please consider off road routes and also possible inclusion of a separate access road from the Moss Side test track development directly onto the bypass rather than using the existing road network along Dunkirk and Longmeanygate etc.</p>
147	282	Chapter D - Policy D1 - Site R	<p>Here is how our Heritage is lost! (See below this statement) The people in charge of local councils must be mad. According to them this mill is an eyesore. They want it demolished so more small brick boxes can be squashed into the space it occupies. These small brick boxes called 'housing' can be built anywhere! Also they are never and will never be anything but what they really are.....hutches for humans, but buildings like this are imposing, wonderful and steeped with heritage, this building is an historic landmark that defines Bamber Bridge. Housing on this site will be the real blight, not only will it be just another dour estate but the people will miss the character of a structure that played a fundamental part in the building of their very community. Shame on them if they allow this!</p> <p>I have put into brackets the 'self serving' and disingenuous words and phrases that are used but cannot be proved or justified, interestingly these words are very common in nearly all local council planning issues. Even more interesting are the magnificent survivors of such literary onslaughts, St Pancras Station for one - but I have more.</p> <p>Wesley Street Mill solution sought (Shows poor photo) of the Wesley Street Mill in Bamber Bridge.</p> <p>(Interested parties) have been urged to work together to come up with a solution* for a derelict mill site in Bamber Bridge.</p> <p>South Ribble Borough Council is seeking a developer to act as a partner in the regeneration of the Wesley Street Mill site and surrounding areas. The mill has lain largely empty for years and has (fallen into increasing disrepair).</p> <p>Councillors voted** in favour of seeking a developer at Wednesday’s full council meeting in a bid to give Bamber Bridge a (boost). The start of any work may be some way down the line due to the complicated network of land owners and interested parties in the area.</p> <p>It is hoped that a scheme can be drawn up to the satisfaction of all parties so the (eyesore) at the heart of Bamber Bridge can be resolved, paving the way for a new housing development. The terms of any agreement with a developer will ensure that they, rather than South Ribble’s taxpayers, will foot the bill for the project.</p> <p>The 100-year-old building is the former home of Bamber Bridge Spinning and Weaving Company. (The mill has fallen into such disrepair) that any development would involve its demolition to make way for new homes.</p> <p>Councillor Cliff Hughes, South Ribble Borough Council’s Cabinet Member with responsibility for Strategic Planning and Housing, said:</p> <p>"We are determined to see the area (regenerated)*** as soon as possible, but there are complicated contractual issues which will take time to resolve.</p>



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			<p>"There is a (tremendous appetite) from all concerned to get this done, and we are seeking to develop the site in a co-ordinated way through (open and constructive discussions). (The mill is currently a blight on the area), but the land is perfect for homes which would bring a huge (boost to Bamber Bridge and the local economy.)"</p> <p>*If you mention solution - then people assume there's a problem.  ** What about asking ALL the community?  *** Regenerated? How? by knocking down Heritage and putting up Garbage! The place is a gem! even empty the place is full of Bats &amp; birds - a Barn Owl haunts the old engine house and outside is an abundance of wildlife. Foxes, Rabbits, Birds even newts and the odd Roe deer - and your plan is to 'regenerate' this with concrete drives? Get a grip.</p>
147	283	Chapter D - Policy D1 - Site R	<p>The recent opening and closing ceremonies of the Olympics showed just how important Historic buildings are to our Towns and City's - not just for the people who live there but for us all. I have extensive experience - garnered over 40 years - and can therefore confidently conclude that when this mill is gone it will be greatly missed. Nostalgia for our past has a most important role, and to rid ourselves of the tangible connections to it is one of the reasons why society has failed in England. To destroy this is to destroy continuity - continuity that has always been the foundation of our culture and our future. To continue to destroy what we have now not the wit or expertise to build is madness! But to do this and use the words 'improve' and 'necessary' is self serving and easily disproved.</p> <p>Bamber Mill, even now, would survive any natural disaster that would see out all those dreadful new structures that blight our country. To say it needs demolition is disingenuous in the extreme. What will replace it? Another dreary Housing estate like the poorly built one sat behind it. Boost to the economy? That too is delusional. Developers run the planning departments of councils - and seem to easily persuade councillors of what they would like to do will improve things. In reality the only improvement will be Developers Bank accounts.</p> <p>Work to find a use! Look at similar buildings that have been converted- some are magnificent! If you cannot find any one to do it now - leave it alone!!! Get the owners to strip out the wood - the basement is so full of inflammable stuff it looks ready to torch (this will curtail the plans for future fires) then leave it alone. Once developers realise they cant get the quick profit and ease of 'box building' someone will buy it and do it right. The grounds are big enough for a Park and Lake and the front for Parking for all the apartments.  To pull it down will be a major mistake and will reflect so on those responsible.</p>
148	285	Chapter C - Policy C4 - Cuerden Strategic Site	<p>We refer to the above document and write to make representations on behalf of the above client, Brookhouse, who has land interests in the site identified as the Cuerden Strategic Site under Policy C4 of the DPD.</p> <p>Brookhouse is in active discussions with John Dalton, the Council's Director of Planning and Housing, in relation to its proposals to invest in the Cuerden Strategic Site (CSS) in order to bring forward beneficial economic development at a site that will meet the Council's wider aspirations for the site and the needs of the population of South Ribble and the wider Central Lancashire area.</p> <p>Despite development principles being firmly set out in policy for many years, and throughout the last property boom, the CSS has remained a stagnated site. It is a shared aspiration of the local authority, the county council and the landowners that the site is brought forward in an expeditious manner to catalyse employment generation. There are a number of reasons why the site has not come forward sooner, but the up-front infrastructure costs are a significant hurdle: taking a new highway connection from the strategic highway network itself would be a multi-million pound investment. There are very few land-uses that would generate sufficient value to justify speculative delivery of such infrastructure: B-Class uses alone would not support this cost now, nor for the foreseeable future.</p> <p>There's a shared aspiration between the local authority and Brookhouse that the site should be a vibrant destination, with activity not just limited to normal office hours during the working week.</p> <p>As part of its ongoing process of working with the council to deliver significant investment opportunities at the Cuerden Strategic Site, Brookhouse request that the following comments should be taken into account by the Local Planning Authority in the finalisation of the publication DPD:</p> <p>1. Comments on the Introduction to Policy C4.</p> <p>Given the comments above on why investment has been delayed through the last property boom, we feel it imperative that policy recognises that for the CSS to be delivered, acknowledgement is made as to how the up-front infrastructure costs to be met.</p> <p>We'd therefore request that the following text is added to paragraph 6.27:</p> <p>'The council recognises that in order to deliver employment generating uses to the site, significant investment would be required to deliver the necessary infrastructure, and a pragmatic approach will be taken to ensure the wider benefits would be delivered.'</p> <p>2. Comments on Policy C4</p> <p>Policy C4 sets out that planning permission for the site will be granted inter-alia subject to an 'agreed Masterplan for the comprehensive development of the site'. A Masterplan is a generic name for a document that sets out the vision and objectives for the comprehensive development of a site. Other such documents include Development Briefs or other forms of Supplementary Planning Documents (SPDs). We therefore suggest that the policy is amended to allow for alternatives to a Masterplan. Such an amendment would include the following wording at C4 part (a):</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>'agreed Masterplan, Development Brief or other document that supports the comprehensive development of the site'.</p> <p>3. Comments on the Justification to Policy C4</p> <p>We support the emphasis at paragraph 6.29 on the need to accelerate comprehensive development, but consider that the justification should acknowledge that in order to meet accelerated aims comprehensive development may need to be enabled by other development. This could be acceptable providing that any such development were placed in the context of a comprehensive vision document in accordance with Policy C4 (as amended). As such, we suggest that additional words are used at paragraph 6.31; we suggest:</p> <p>'It is acknowledged that the alternative uses set out may have to come forwards as enabling development becoming ancillary across a range of uses in the Masterplan Development Brief or other document over the passage of time.'</p> <p>Ancillary development in this sense could also be described as complementary and so perhaps the definition would be widened in 6.31 to reflect this.</p> <p>4. Additional comment</p> <p>In the light of the above comments, we suggest that the following additional amendment set out in [bold] is made to relevant text elsewhere in the DPD as follows.</p> <p>a. Paragraph 8.28</p> <p>The retail hierarchy directs retail development and town centre uses to Leyland Town Centre. Retail growth elsewhere will need to be of levels which are appropriate to the location, [but also in accordance with the National Planning Policy Framework, it is important that needs for retail and other main town centre uses are met in full and are not compromised by limited site availability.] With regards to District and Local Centres there is a reasonable degree of flexibility to be applied to ensure they can perform their important local community role and serve a different purpose to the town centre. Care will also be needed to avoid, for example, a single excessively large retail outlet which risks competing with the town centre or undermining the healthy mix of functions within the Local Centre.</p> <p>Conclusion</p> <p>The Cuerden Strategic Site has remained undeveloped for some considerable time, and is an exceptional opportunity to generate significant new employment opportunities. A pragmatic approach is needed to understand how the site is best delivered. Additionally, there is a real shared ambition to create an exceptional destination. Our comments seek to help deliver the shared vision.</p> <p>We request that the above comments will be taken into account in the finalisation of the DPD and we look forward to being included in further rounds of consultation for the Local Development Framework.</p>
149	286	Chapter C - Policy C1 - Pickering's Farm	<p>The HCA supports the allocation of Pickering's Farm as a residential-led Major Development Site within the DPD as its selection is based on a sound evidence base. In previous rounds of consultation on the DPD the HCA promoted a larger allocation than that proposed within the Preferred Option to be included within the DPD, extending it to the south. The HCA welcome the Council's decision to partially accept this argument and extend the allocation, recognising the need for a larger allocation to meet housing land requirements, as well as ensuring that relevant and necessary infrastructure is delivered including the Cross Borough Link road and other community benefits.</p> <p>The HCA owns significant parcels of land within the allocation and within the Safeguarded Land to the south. The Agency is actively collaborating with Taylor Wimpey (TW) who both own and represent other significant landowners through a land options and consortia agreement to promote this project. Work has been undertaken to produce a Development Statement (covering all environmental and technical disciplines) and this has been submitted to the Council. The statement comprehensively demonstrates that this site is deliverable, as well as providing evidence on the scale and potential land use mixes and an indicative phasing plan.</p> <p>As well as supporting the allocation, the HCA would welcome future engagement with the Council to ensure that the Safeguarded Land to the south of the allocation, whilst coming forward in a future plan period, is appropriately considered in a holistic way. As such Policy C1 (a) is strongly supported. This will ensure that the site (both the emerging allocation and the Safeguarded Lane) is comprehensively masterplanned and that future infrastructure requirements are considered, particularly highway and public realm improvements at Tardy Gate and the final link of the Cross Borough Link Road (Policy A2). This is considered reasonable given the scale of the allocation and the fact that the site will be developed over a number of years (beyond the current plan period).</p>
149	287	Chapter D - Policy D1 - Site P	<p>The HCA welcomes and supports the allocation of this site for residential development. The allocation is based on a sound evidence base, including the Sustainability Appraisal Non Technical Summary (paragraph 5.4) which states that the site forms a natural extension to Leyland and has good access to services and facilities including healthcare facilities and employment opportunities.</p> <p>The HCA owns a proportion of this site and is collaborating with Redrow and the Worden Estate, who are the other landowners. Environmental and technical work has been undertaken by a team</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>of consultants which demonstrates that this site is deliverable. This work has been drawn together by Turley Associates into a Development Statement and has been submitted to the Council. This statement includes high-level masterplanning which shows that the site can accommodate 430 dwellings. This corresponds with the capacity figures set out in Table 1 of the DPD. The HCA are working with Redrow on taking this work a stage further through the joint production of a Planning Brief. This Brief will provide further detail and assurance about the timing of development, as well as testing capacity assumptions and layout options, particularly in the context of the site's location adjacent to the Greenbelt and Worden Park.</p> <p>In terms of the overall design concept for the site the HCA supports an approach which integrates with and seeks to enhance Worden Park, including facilitation of the park extension. The masterplan provides green links throughout the site, as well as incorporating sensitive boundary treatments. The masterplan approach reflects the urban edge on the northern boundary, contrasting with lower densities to the south of the site to reflect the Greenbelt edge. In terms of delivery it should be noted that the site has two access points which offer the potential opportunity for accelerated delivery.</p> <p>The HCA strongly supports the reference in paragraph 7.43 and Policy G9 – 'Worden Park' for the site to assist in the delivery of an extension to the park. The HCA welcomes ongoing dialogue to explore options to deliver Policy G9.</p>
149	288	Chapter C - Policy C3 - Site W	<p>The HCA supports the allocation of this site within the DPD as a major site for residential development (Policy C3). In previous rounds of consultation on the DPD the HCA promoted a larger allocation than that proposed within the Preferred Option to be included within the DPD, extending it to include the Safeguarded Land to the north of Bannister Lane up to Moss Lane. The HCA welcome the Council's decision to accept this argument and fully support the allocation, recognising the need to secure comprehensive development of the site, including community uses and infrastructure.</p> <p>The HCA owns significant parcels of land within the allocation and have contributed to and funded two Development Statements for the site (land to the south of Bannister Lane and land to the north of Bannister Lane). Collectively the two Development Statements demonstrate (from a technical and masterplanning perspective) that the allocation is deliverable and justified, and provides a robust evidence base to support the policy. Both Development Statements have been submitted to the Council and are available.</p> <p>In terms of land to the south of Bannister Lane the HCA owns a substantial proportion of the site and is actively collaborating with agents Lea Hough &amp; Co, who represent a consortium of the majority of the remaining landowners. Detailed technical and environmental baseline work, masterplanning and public consultation is currently being undertaken to support the submission of an outline planning application. The application is likely to be submitted in September 2012.</p> <p>Based on the transport assessment work which has been undertaken and the requirements of paragraph 6.25 the HCA are aware of the Council's preferred approach to have highway access to the northern part of the allocation from Flensburg Way / Moss Lane, and the southern part of the allocation from Heatherleigh and / or Croston Road, avoiding primary access from Bannister Lane. The masterplanning work completed as part of the two Development Statements fully respects the Council's desire to restrict access from the site onto Bannister Lane and proposes only new on-street frontage development, effectively retaining Bannister Lane as a cul-de-sac.</p> <p>The allocation's status as a Major Development Site should be reflected and listed on page 7 of the DPD.</p>
149	289	Chapter D - Policy D1 - Site I	<p>The HCA supports the identification of this site as a 'Site with Planning Permission' within Table 2 of the DPD. The HCA owns the site and has secured planning permission for 42 units (September 2011), in accordance with the emerging DPD. The site was previously identified as an allocated housing site within the South Ribble Local Plan (February 2000).</p> <p>The HCA are currently marketing the site for disposal, and subject to market uptake it is anticipated that development could commence on-site in early 2013. The HCA undertook extensive local engagement prior to the submission of the application, and continues to work with the Council to ensure the efficient delivery of the site.</p>
149	290	Chapter G - Policy G3	<p>The HCA has previously promoted this site through the Call for Sites, Issues &amp; Options and Preferred Option stages of plan production. The site was identified within the Preferred Option DPD as an employment site, but has now been deleted and is proposed to revert back to being Safeguarded Land within the Publication DPD.</p> <p>The HCA owns this site and has undertaken technical and environmental work to analyse site constraints, infrastructure requirements, masterplanning, commercial viability and market demand. This work has been produced on behalf of the HCA and assembled into a Development Statement. The work undertaken demonstrates that the site is available, viable, and deliverable and demonstrates that there is local market demand. This statement has been submitted to the Council and is therefore a public document.</p> <p>As noted above the Council have decided not to allocate the site, and instead the site remains as Safeguarded Land. The HCA respect the Council's decision, and note the reasoning on the grounds of over supply of employment land (in relation to the amount specified within the Central Lancashire Core Strategy) and local objections.</p> <p>Retaining the site as Safeguarded Land (Policy G3) allows the Council to consider its release as part of a future review of the DPD. Retaining the site as Safeguarded Land is considered by the HCA to be justified as the site represents a sustainable extension to Leyland (a key service centre within the CLCS) and is therefore considered to be suitable for future release. It should be noted that the Development Statement included an option for the site to accommodate some residential development, and therefore consideration should be given when the plan is reviewed to the site's suitability for future residential and / or mixed use.</p>
149	291	Chapter G - Policies G5 & G6 - Lime Kiln Farm	<p>The HCA has previously promoted this site through the Call for Sites, Issues &amp; Options and Preferred Option stages of plan production to be included as a residential allocation. The site is currently a housing allocation within the South Ribble Local Plan (February 2000) and identified in the Central Lancashire Strategic Housing Land Availability Assessment (September 2010) as site SA3 which is suitable, available and achievable to deliver approximately 190 dwellings (90 in the period between 2010/11 and 2014/15 and a further 100 in the period between 2015/16 and</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>2019/20). The DPD allocation for the site is for an Area of Separation (Policy G5), within a wider Central Park (Policy G6). Policy G6 requires that the park be delivered to enhance and protect green infrastructure, as well as creating new parkland and open spaces.</p> <p>The HCA owns the allocated land and a large area of the proposed Central Park and welcomes the concepts of the Proposed Central Park and Areas of Separation between Bamber Bridge / Lostock Hall, with an element of enabling residential development to deliver the park. In supporting the aspirations of the Council the issue which requires further consideration is how the policies for the Central Park are to be delivered. Given the site's existing allocation for housing the HCA believe that the sensitive inclusion of housing within the park will enable and support the successful delivery of the Policy G6 and create a new attractive environment.</p> <p>The HCA have instructed a range of environmental and technical work to support its residential proposals and provide the Council with a robust evidence base. This work has been brought together by Atkins into a Development Statement and has been submitted to the Council. The accompanying masterplan is based on the provision of low density, predominantly detached dwellings within a parkland setting, retaining the principle of the area of separation and avoiding coalescence of adjacent areas. The overriding consideration with the production of the statement has been to retain the integrity of the park, via substantial green links and investment in open spaces. The HCA considers that allowing some residential development is the only realistic and viable option to achieve the Council's aspirations.</p> <p>The layout also includes extensive boundary treatment and landscaping. A significant area of the Central Park is included within the masterplan, extending well beyond the proposed residential areas. The plans include an extension to the linear park concept and footpath linkages from Walton Park across Todd Lane to the A6 and south and west to Lostock Hall. The masterplanning work indicates the ability to accommodate up to 150 dwellings alongside formal and informal open space.</p> <p>The HCA considers that there is merit in the Council giving further consideration to allowing an element of residential development to come forward to enable to the Park to be delivered. This could be through a new residential allocation or revised wording of the final paragraph of Policy G6, with appropriate policy criterion which requires the provision of a Central Park and Areas of Separation around any residential development. This suggestion is based on extensive technical work provided within the Development Statement and the Central Lancashire Strategic Housing Land Availability Assessment. The Development Statement illustrates how the site can be developed sensitively and deliver the Central Park vision, whilst at the same time provide critical enabling development.</p>
149	292	Appendix 7	<p>The HCA owns most of this site and supports its allocation as a Biological Heritage Site. The HCA welcomes continuing dialogue with the Council on exploring options to ensure that the site is effectively protected.</p> <p>Given the HCA's extensive land holdings and future development activity elsewhere within the Borough it is expected that this site could be required in order to provide mitigation / enabling for the development of other sites. The formal process for determining long term management would depend on the potential impacts of other HCA development sites within the Borough balanced against the scale of benefit likely to be provided at this site. The site is 13.6ha and therefore has considerable potential benefits for both South Ribble and Preston.</p>
149	293	Chapter G - Policy G3 - South of Coote Lane	<p>The HCA owns a significant proportion of this Safeguarded Land allocation and supports its inclusion with the DPD. The HCA agree with the Council that the site is not currently required for development within the plan period, but it is likely to be required in the future to meet the Borough's longer term development needs. The HCA has commissioned a range of environmental and technical reports which demonstrate that development of the site is achievable and deliverable. This technical work shows that the site could accommodate up to 230 dwellings in the future.</p>
149	482	General	<p>Further to the publication of the above consultation document, the Homes and Communities Agency (HCA) welcome the opportunity to comment on the South Ribble Site Allocations &amp; Development Management Policies DPD (Publication Version).</p> <p>The HCA regards the DPD as a key document to support a sustainable policy framework for future growth within the Borough. This response is provided following extensive dialogue between our respective officers on the emerging DPD policies. You will be aware that the HCA made representations in response to the initial Call for Sites (2007 and 2008), the Issues &amp; Options (January 2011) and the Preferred Option (December 2011).</p> <p>The HCA has significant land assets within the Borough, inherited from its predecessor organisations, English Partnerships and the Commission for the New Towns. It has a strong record in the delivery and enabling of housing and building on this positive role the HCA is keen to assist the Council in delivering the housing and growth aspirations set out within the DPD. Given the number and size of sites within its ownership and / or influence, the HCA is a critical delivery partner to the Council in the realisation of the housing growth targets.</p> <p>For the purposes of clarity, the representations accompanying this letter relate solely to the HCA's land interests or areas of influence within the Borough. They are submitted following varying degrees of consultation with a range of development partners. They are also made to provide support for the choice of proposed allocations, as expressed in previous consultation responses and provide further detail of the work underway to progress the sites.</p> <p>The representations generally reiterate previous comments made by the HCA, and focus specifically on the following allocations:</p> <ul style="list-style-type: none"> <li>• Pickering's Farm, Penwortham (EE) – Residential Allocation</li> <li>• Altcar Lane / Shaw Brook Road, Leyland (P) – Residential Allocation</li> <li>• South of Bannister Lane / North of Heatherleigh (W) – Residential Allocation</li> <li>• Hospital Inn Railway Crossing, Brindle Road, Bamber Bridge (I) – Site with a Current Planning Application</li> </ul>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<ul style="list-style-type: none"> <li>• Leyland Lane / Emnie Lane, Leyland – Safeguarded Land</li> <li>• Limekiln Farm/Todd Lane – Central Park (G6) &amp; Area of Separation (G5)</li> <li>• Howick Hall – Biological Heritage Site</li> <li>• South of Coote Lane, Chain House Lane, Farington – Safeguarded Land</li> </ul> <p>In our view none of the comments / observations raised in our representations affect either the soundness of the plan or its legality. All of our comments have been submitted in the spirit of partnership working and in recognition of the HCA's current and future role in delivery. The HCA trusts that the attached representations will be considered as the council progresses with the Site Allocations &amp; Development Management Policies DPD through to formal adoption.</p> <p>The HCA remains supportive of the DPD and looks forward to working with the Council to deliver and enable local priorities.</p>
150	294	Chapter D - Policy D1 - Site P	<p>I would like this opportunity to strenuously object to the proposed planning application for residential development to the fields on Leyland Lane between Altcar Lane and Shaw Brook Road.</p> <p>This area has always been regarded by the residents as green belt, irrespective of councils changing their minds and re-designating as the whim takes them.</p> <p>There is no argument that makes any rational sense in turning this beautiful agricultural area into yet another sprawl of concrete and stone. Extensive planning permission has been given to areas off Wigan Road and the massive derelict site of the old ROF already has the infrastructure required and has far more capacity for new housing than will be needed in the next 20 years.</p> <p>Please don't extend any further into the countryside than you have already done.</p>
151	295	Chapter D - Policy D1 - Site P	No comments entered on form.
152	296	Chapter D - Policy D1 - Site P	<p>I am writing to OBJECT to the inclusion of the Altcar Lane Housing development in the published version of the DPD on the basis of the following objections:</p> <p>There is no immediate access for the ingress and egress of traffic into the site. The proposed egress from the site onto the roundabout at Schleswig Way and Leyland Lane suggests a twice-daily traffic problem. This would affect the quality of life of site residents and those of the immediate local area.</p> <p>The traffic movement onto Leyland Lane, which is a 'B' road, for the 2.4 cars per household which 430 houses would generate, would be greatly affected and probably could not cope. The morning journeys to work, then followed by the school run would overload Leyland Lane by an additional 1200 cars each morning. The evening would then be the same. This would mean 2400 additional cars on Leyland Lane per day!!!! Seven Stars would be gridlocked, it can hardly cope now at peak travel times.</p> <p>The pollution caused by these journeys would be noise pollution and air pollution causing health problems.</p> <p>There is no plan of the potential street scene and if it would be in keeping with the housing on Leyland Lane, Altcar Lane and Worden Lane.</p> <p>At this time the area allocated for housing is countryside that is currently farmed. This supports an eco system that has been the same for hundreds of years and plant life, trees and wildlife would be massively affected to their detriment. In some cases to extension!</p> <p>There is no provision for additional doctors, dentists, schools, police and emergency services to support this housing.</p> <p>I ask you to take these objections into consideration.</p>
152	388	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
153	297	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
153	389	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
154	298	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
154	390	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
155	299	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
155	391	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
156	300	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
156	392	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
157	301	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
157	401	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
158	302	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
158	393	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
159	303	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
159	394	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
160	304	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
160	395	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
161	305	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
161	396	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
162	306	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
162	397	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
163	307	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
164	308	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
165	309	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
166	310	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
166	399	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
167	311	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
167	400	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
168	312	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
168	402	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
169	313	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
169	403	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
170	314	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
170	404	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
171	315	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
171	405	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
172	316	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
172	406	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
173	317	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
173	407	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
174	318	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
174	408	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
175	319	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
175	409	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
176	320	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
176	410	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
177	321	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
177	411	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
178	322	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
178	412	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
179	323	Chapter D - Policy D1 - Site P	Representation Acknowledgement returned by Royal Mail - No such address  Please see identical representation Ref No: 152, ID 296
179	413	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
180	324	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
180	414	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
181	325	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
181	415	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
182	326	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
182	416	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
183	327	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
183	417	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
184	328	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
184	418	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
185	329	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
185	419	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
186	330	Chapter D - Policy D1 - Site P	Representation Acknowledgement returned by Royal Mail - Addressee unknown  Please see identical representation Ref No: 152, ID 296
186	420	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
187	331	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
187	421	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
188	332	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
188	422	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
189	333	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
189	423	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
190	334	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
190	424	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
191	335	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
191	425	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
192	336	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
192	426	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
193	337	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
193	427	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
194	338	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
194	428	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
195	339	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
195	429	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
196	340	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
196	430	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
197	341	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
197	431	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
198	342	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
198	432	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
199	343	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
199	433	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
200	344	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
200	434	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
201	346	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
201	435	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
202	347	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
202	436	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
203	348	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
203	437	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
204	438	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
205	349	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
205	439	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
206	350	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
206	440	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
208	351	Chapter D - Policy D1 - Site P	<p>It was with a great deal of alarm that myself and my neighbours were today alerted to the LDF plan to build 430 homes on land between Altcar Lane and Shaw Brook Road. Our houses back on to Shaw Brook Road and any plan to build houses on this land would cause a great deal of anxiety amongst us. To find that any objections to this have to be submitted by August 15 (ie today) has come as a great surprise to the residents of Butlers Farm Court.</p> <p>I find it difficult to understand how and why it was left to chance readership of a local newspaper (and it was completely by chance that I came to read the article yesterday evening) that such an important announcement (life-changing for those of us who bought our properties because they were not overlooked_) should be so poorly circulated.</p> <p>As the residents of Butlers Farm Court are likely to be the people most affected by this plan, I would have thought that a document 'signposting' this could have been posted or hand-delivered? I have previously been into SRBC to find out about the LDF and believed my name was on record as being an interested party?</p> <p>As the article in the Leyland Guardian gives no indication of where our 'views' are to be sent I can only assume that handing this in at SRBC offices might lead to some response?</p> <p>I speak for all the residents of our complex in saying that we are absolutely opposed to any such proposal to build houses on the land between Altcar Lane and Shaw Brook Road. We were assured by the builder that this land was 'Green Belt' and as such would remain so. Any increase in traffic would be of great concern, especially to those residents with young children.</p> <p>We have been trying for some time to find out from SRBC why our road remains unadopted and therefore no street cleaning, etc takes place but this is obviously not a matter that is considered important by the 'powers that be'.</p> <p>I await your reply with great concern.</p>
209	352	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
209	441	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
210	353	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
210	442	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
211	354	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
211	443	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
212	355	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
212	444	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
213	356	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
213	445	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
214	357	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
214	446	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
215	358	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
215	447	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
216	359	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
216	448	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
217	360	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
217	449	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
218	361	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
218	450	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
219	362	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
219	451	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
220	363	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
220	452	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
221	364	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
221	453	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
222	365	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
222	454	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
223	366	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
223	455	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
224	367	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
224	456	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
225	368	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296  In addition:  I think that nice large houses should be left in an area, free from crowding of other lesser houses, my reason is, that nice larger houses should be appealing for business people who work hard and aspire to build larger businesses that create employment which in turn helps the economy. Why bother building a business if you can't find a nice place to spend your money on?
225	457	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
226	369	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
226	458	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
227	370	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296  In addition:  I really fail to understand why you are not prioritising the existing unused "brownfield sites" eg the old Leyland Motors site behind Morrisons (to the side) instead of destroying green belt agricultural which has an abundance of wildlife including sightings of barn owls and a wider variety of domestic birds, local indigenous tree specials - this land cannot ever be replaced as diversity green fields.
227	459	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
228	371	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
228	460	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
229	372	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
229	461	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
230	374	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
230	462	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
231	375	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
232	376	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
232	463	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
233	377	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
233	464	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
234	378	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
234	465	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
235	379	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
235	466	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
236	380	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
236	467	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
237	381	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
237	468	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
238	382	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
238	469	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
239	383	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
239	470	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
240	384	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
240	471	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
241	385	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 152, ID 296
241	472	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
242	473	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
243	474	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
244	475	Chapter G - Policy G3	Please see identical representation Ref No: 84, ID 387
245	476	Chapter D - Policy D1 - Site P	LATE SUBMISSION  Please see identical representation Ref No: 152, ID 296
245	477	Chapter G - Policy G3	LATE SUBMISSION  Please see identical representation Ref No: 84, ID 387
246	478	Chapter D - Policy D1 - Site P	LATE SUBMISSION  Please see identical representation Ref No: 152, ID 296
246	479	Chapter G - Policy G3	LATE SUBMISSION  Please see identical representation Ref No: 84, ID 387
247	480	Chapter D - Policy D1 - Site P	LATE SUBMISSION  Please see identical representation Ref No: 152, ID 296
247	481	Chapter G - Policy G3	LATE SUBMISSION  Please see identical representation Ref No: 84, ID 387
249	483	Chapter D - Policy D1 - Site P	<p>I am writing to OBJECT to the inclusion of the Altcar Lane Housing development in the published version of the DPD on the basis of the following objections:</p> <p>There is no immediate access for the ingress and egress of traffic into the site. The proposed egress from the site onto the roundabout at Schleswig Way and Leyland Lane suggests a twice-daily traffic problem. This would affect the quality of life of site residents and those of the immediate local area.</p> <p>The traffic movement onto Leyland Lane, which is a 'B' road, for the 2.4 cars which the 430 houses would generate, would be greatly affected and probably would not cope. The morning journeys to work, then followed by the school run would overload Leyland Lane by an additional 1200 cars each morning. The evening would then be the same. This would mean 2400 additional cars on Leyland Lane per day. Seven Stars would be grid locked. It cannot cope now at peak times.</p> <p>The noise and air pollution caused by these journeys would cause health problems.</p> <p>There is no plan of the potential street scene and if it would be in keeping with the housing on Leyland Lane, Altcar Lane and Worden Lane.</p> <p>At this time the area allocated for housing is countryside that is currently farmed. This supports an eco system that has existed for hundreds of years. Plant, trees and wildlife could be massively affected to its detriment and in some cases possible extinction.</p> <p>Also, there is no provision for additional doctors, dentists, schools, police and emergency services to support this housing.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			I ask you to take these objections into consideration.
249	508	Chapter G - Policy G3	I am writing to support the Council's decision to safeguard the area of land at Emnie Lane from development as an employment area.  I am extremely pleased that the council has taken this decision.
250	484	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
250	509	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
251	485	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
251	510	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
252	486	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
252	511	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
253	487	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
253	512	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
254	488	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
254	513	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
255	489	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
255	514	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
256	490	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
256	515	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
257	491	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
257	516	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
258	492	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
258	517	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
259	493	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
259	518	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
260	494	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
260	519	Chapter G - Policy G3	Please see identical representation Ref No: 152, ID 296
261	495	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
261	520	Chapter G - Policy G3	Please see identical representation Ref No: 152, ID 296
262	496	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
262	521	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
263	497	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
263	522	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
264	498	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
264	523	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
265	499	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
265	524	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
266	500	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
266	525	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
267	501	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
267	526	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
268	502	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
268	527	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
269	503	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
269	528	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
270	504	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
270	529	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
271	505	Chapter D - Policy D1 - Site P	Please see identical representation Ref No: 249, ID 483
271	530	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
274	533	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
275	534	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
276	536	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22
277	535	Chapter G - Policy G3	Please see identical representation Ref No: 249, ID 508
278	537	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
279	538	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
280	539	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
281	540	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
282	541	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
283	542	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
284	543	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
285	545	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
286	546	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
287	547	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
288	548	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
289	549	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
290	550	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
291	551	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
292	552	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
293	553	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
294	554	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
295	555	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
296	556	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
297	557	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
298	558	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
299	559	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
300	560	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
301	561	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
302	562	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
303	563	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
304	564	Chapter G - Policy G4	Please see identical representation Ref No: 276, ID 536
305	565	Chapter G - Policy G4	Please see identical representation Ref No: 15, ID 22  Furthermore, I think it would be a good idea to utilise the land for community benefits such as allotment schemes.
306	566	Chapter G - Policy G4	I agree with the G4 policy of 15 year development plan.
307	567	Chapter G - Policy G4	I agree to the 15 year plan.  I agree to the G4 policy relating to Protected Open Lane contained in the 15 year development plan.
308	568	Chapter G - Policy G4	Please see identical representation Ref No: 307, ID 567
309	569	Chapter G - Policy G4	I agree to the fifteen year plan. G4



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
310	570	Chapter G - Policy G4	Please see identical representation Ref No: 309, ID 569
311	571	Chapter G - Policy G4	Please see identical representation Ref No: 309, ID 569
312	573	Chapter C - Policy C3 - Site W	<p>I am a resident of Heatherleigh, Leyland and I have just returned from a public consultation on the proposed residential development on the land west of Croston Road, Leyland. I attended the meeting for an hour and a half which was very informative but has left me with some concerns.</p> <p>No local councillor was present or any member of your newly formed Neighbourhood Forum which was disappointing as there were a large number of members of the public present. After a short time I realised why no council member was present and that is because the council is in favour of the land being developed for housing. As a resident of Heatherleigh I am against the development and would like that to be recorded.</p> <p>I am however, realistic and feel that as a council you will continue with the proposal and on looking at the proposed development by Lea Hough I would like you to consider the following.</p> <p>They propose that one of the main entrances to this new development will be on Heatherleigh. The new estate will have 350 houses. If each house only has one car that is a considerable increase in the volume of traffic on Heatherleigh. Heatherleigh already has issues with vehicles and has humps in the road to reduce speed. It also has a considerable amount of children who play ride bikes etc and from a road safety point of view I feel that having the entrance onto the new estate from Heatherleigh will literally be an accident waiting to happen. It was raised at the consultation that Croston Road cannot be the only access exit point onto the new estate. I do not see why as it seems to manage perfectly well on the opposite side to accommodate Morley Croft/Barn Hey Drive estate. Surely if this entrance is not already in existence it can be designed to accommodate the whole of the new estate.</p> <p>My next point is that of the "landmark building" on the proposed entrance at Heatherleigh. I have been told by the development team that they propose this to be residential and I would ask that this be the case. I do not wish a shop, community centre, etc, to be put on this point as I feel that this will increase anti social behaviour in the area. I base this on the visits to the relatively new small Tesco on Leyland Lane and seeing the juveniles hanging around it.</p> <p>The area which is currently empty but earmarked for recreation on Heatherleigh gives me great concern. Originally when Heatherleigh was built this area was equipped with play equipment for very small children. However it was dismantled a few years later when the council reviewed the play areas in the borough. Morley Croft/Barn Hey Drive estate was then developed and some money (106) was given for play provision. The small play area, it was then proposed by the council should have a basketball court facility put on it. This was objected to by residents and thankfully the council did withdraw. I would ask that this area not be developed to this extent again and that the money (106) from this new development be used on that actual development ie build a play area in the actual estate.</p> <p>I have great concerns regarding Schleswig Way being able to cope with the added traffic that this estate will bring. The congestion at peak times is horrific and the speeding is terrible. Although I accept that attempts have been made to address this by reducing the speed limit to 50 this has had little effect. Could some of the money (106) from the new estate be used to improve this issue?</p> <p>Thank you for taking the time to read this email and I would also like it to be passed onto my local councillor, I do not know who this is.</p> <p>Lea Hough please take this as my feedback to your consultation as I cannot find the form electronically on your website. Please thank your staff for the consultation meeting they did take a lot of flak from residents but they did cope.</p>
313	574	Chapter C - Policy C3 - Site W	<p>I would like to express my objections to the development of the land behind my house on Croston Road for several reasons that I have listed below.</p> <p>After building the recycling plant which is visible from the front of my property, I feel this is yet another eyesore which will vastly reduce the value of my property in the future. My last outlook over the countryside at the back will be lost forever and my views turned into a modern estate. Something which I did not move here for several years ago, had I wanted the outlook of a housing estate then I would have stayed in Manchester! The lovely views and tranquillity of the area were contributing factors when I purchased the property, otherwise I would have not chosen this area. Views which unfortunately are now in the process of being removed from me altogether if this development goes ahead.</p> <p>The building of the recycling plant was a kick in the teeth, taking away the beautiful views of the hillsides, etc, that are now totally unviewable from my property due to the height of the recycling plant! And now, my last views of the countryside behind my house will also be taken away with any future development no matter how large or small.</p> <p>This will also have a detrimental effect on the wildlife that inhabits the moss as I like to call it. At present, the wildlife is in abundance and thriving well, frogs, toads, newts, countless birds etc will all be lost for nothing more than profit once again. Whatever gets built can only have a negative effect on the local wildlife and all the animals, birds, etc, that frequent my garden will only disappear in time. Something which in the long term is far more important than the building of any dwellings no matter what.</p> <p>The building of any housing will also cause total havoc regarding many other situations in the area, the transport infrastructure is not capable to taking the extra volume of traffic that would increase due to the development. The roads are already overburdened and at certain times of the day come to a near standstill during the rush hours. Something that would only increase due to the added pressure from such a large development of houses. Not to mention the noise as the roads become more busier and during construction! Croston Road is already busy enough without access for a new estate being added in the process.</p>

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			<p>The proposal has also made me re-think about developing my own property any further. I had hoped to have the attic converted to take advantage of the views behind my house, but this won't be going ahead if I'm to be staring out over some modern housing estate, I mean who wants to look at an area covered in houses as tightly packed as financially viable. Built in a variety of designs and materials like a patchwork quilt!!</p> <p>Take Buckshaw Village as an example, absolutely horrible and let's be honest, struggling to sell due to the financial market and design of the estate. Nobody wants this kind of housing, especially behind Croston Road, not now and not ever. This area should have its land use description changed to Green Belt, to protect it for the future and to preserve all the wildlife that lives within it.</p> <p>The building of any houses on this land is without doubt going to have a detrimental effect on the future value in any sale of my house, if it was to go ahead.</p> <p>Will residents be compensated? Because the value of my property has already taken a severe blow since the building of the recycling plant. Having a new estate back to back with me hardly makes me gleam with envy at what I would have lost to make it possible.</p> <p>All in all the land should stay as it is in my opinion, it's something that is irreplaceable once its gone. I'm sure if the houses get the go ahead then I along with the community of Croston Road will find its time to go too.</p>
314	575	Chapter C - Policy C3 - Site W	<p>When we moved to Croston Road 25 years ago it was in a lovely semi-rural area. You then built Heatherleigh and took away some green areas. You then built Barn Croft and took away another large area of green fields. Over the time traffic has increased to a great degree and traffic calming procedures haven't worked.</p> <p>You are now proposing to build 1,000 more homes on all the green fields to the west of Croston Road from Heatherleigh to Moss Lane, with all the extra traffic coming into Croston Road.</p> <p>There will soon be no green fields left in Farington Moss and it will become more of an urban area.</p> <p>Totally against all this development.</p>
315	576	Chapter C - Policy C3 - Site W	<p>Why is the council allowing planning application on green sites when there are existing brownfield sites still to be developed out eg BTR site, land to rear of Morrisons, land off old railway sidings in Lostock Hall, former Test Track on Moss Side industrial estate.</p> <p>The impact on the volume of traffic on Croston Road and the road junction of Golden Hill and Longmeanygate, in addition to the roads at the double roundabout on Croston Road towards Lostock Hall. Why is no consideration of putting a roundabout access off Flensburg Way.</p> <p>There are limited or no local amenities in this area to sustain a development of this size, eg junior schools, doctor surgery, chemist.</p> <p>The proposal of the surveyors highlights a landmark building for the site on Heatherleigh. This would be out of character for the area. There are no buildings between the AFL store and Church Road over two storey, any property over two storey would be out of character for the area and an eyesore/blot on the landscape.</p>
316	577	Chapter C - Policy C3 - Site W	<p>I object to the proposed development strongly.</p> <p>In 1971 I moved my family to Farington Moss for the following reasons:</p> <ul style="list-style-type: none"> <li>a) It was a rural area, not built up</li> <li>b) It was a quiet area</li> <li>c) It was a non-industrial area</li> <li>d) Buying a house was the country's normal investment procedure for one's old age.</li> </ul> <p>The effect of the development on a, b, c and d would be:</p> <ul style="list-style-type: none"> <li>a) To decimate the area as no green areas would remain, resulting in one large built-up area.</li> <li>b) The country average is 2 cars per home. An extra 350 new houses would result in an extra 700 vehicles, polluting and using a cramped and unsuitable road system.</li> <li>c) A vast recycling plant has already been introduced in the area, devaluing our houses.</li> <li>d) From day one, news of the development has drastically reduced the value and saleability of our home. Due to a drastic loss in value a re-assessment of council tax banding of each home is essential. Consult local estate agents if you have doubts.</li> </ul>
317	578	Chapter C - Policy C3 - Site W	<p>Responses to Lea Hough questionnaire.</p> <p>How can the masterplan be improved?</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>“The masterplan can be improved by leaving the country as it is, just stop upsetting residents who already live on Croston Road. Have you taken notice of the number of houses up for sale! And the local council need to look after what we already have got.”</p> <p>What sort of housing do you think should be developed on the site? Do you think the site should provide affordable housing?</p> <p>“We had affordable housing once, but what do the council do? Sell them off, when they are ready for a re-vamp!”</p> <p>How else do you consider the new development should be accessed?</p> <p>“The existing roads on Croston Road are not going to grow bigger, to take another 300 cars. How are people going to get out of the place to get to work on time!”</p> <p>Which transport measures do you support as part of the new development proposal?</p> <p>“Multiple Access points from the development to distribute traffic more evenly – Yes – because Croston Road cannot take any more traffic.</p> <p>Works to Croston Road to slow traffic and improve pedestrian crossing points – Yes.</p> <p>Low key, country lane style roads on site to reflect the character of the area – Yes.”</p> <p>Any further comments</p> <p>“Please stop making more trouble, and look after what we already have.”</p> <p>General</p> <p>“I am now coming up to my 80th birthday, having lived in this area all my life, between Worden Park, Leyland, and Farington Moss. As a child went to St Paul’s Church School, during the 2nd World War. My mother and I worked at Earnshaw Bridge Cotton Mill. The mill provided cottages for their mill workers. I was devastated when they said the mill was closing, and then all the rest of the mills in the town closed one by one. Leyland and Birmingham Rubber Works. BTR Rubber Works, which is now a big housing estate in Wheelton Lane. They have done all this damage to the economic growth we once had, and built houses instead! All this has got to stop and put back the jobs first. My late husband and I survived from plenty of work in the town, our children went to the local schools and then on to university. Are you going to build more schools instead of keep closing them down? Where are all those children going to go? Farington St Paul’s primary school is already full!”</p>
318	579	Chapter C - Policy C3 - Site W	<p>Responses to Lea Hough questionnaire.</p> <p>How can the masterplan be improved?</p> <p>“The existing highways and footpaths (there are none in some parts) cannot take any more traffic. Retaining natural features is good but who is going to maintain them for the next hundred years and beyond. LA cannot maintain current natural features in built up areas, never mind taking on more.”</p> <p>What sort of housing do you think should be developed on the site? Do you think the site should provide affordable housing?</p> <p>“Definitely not. Family accommodation is good but with no schools, doctors surgeries, clinics within two miles of the new development it just won’t work. Affordable housing – we had loads – the local . . . (missing from photocopy received) . . .”</p> <p>How else do you consider the new development should be accessed?</p>

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			<p>“The junction at Earnshaw Bridge is currently an accident waiting to happen (several have) and cannot take any more traffic. This also affects Leyland Lane, Golden Hill Lane and Longmeanygate.”</p> <p>Which transport measures do you support as part of the new development proposal?</p> <p>“Multiple Access points from the development to distribute traffic more evenly – How? Nothing I have been told today in the consultation meeting has convinced me that the flow of traffic will be eased.</p> <p>Works to Croston Road to slow traffic and improve pedestrian crossing points – Speed restrictions now cause damage to cars, noise to people living there and just cause queues on an already congested Croston Road.</p> <p>Low key, country lane style roads on site to reflect the character of the area – Very nice but accumulation of leaves and debris from trees on footpaths and roads causes them to be very slippery when wet and flooding when the LA don’t sweep the roads often enough as is the case now on Leyland Land and all over the Jackson Farm estate. If they can’t keep on top of existing roads on estates, how are they going to manage a new development?”</p> <p>Any further comments</p> <p>“Public transport is limited along Croston Road. Family accommodation means children need access to schools – school buses are a waste of time for children who stay for extra curricula activities – parents still have to collect causing most families needing 2 cars (whether they can afford them or not).”</p> <p>“It will not have the affect intended. The type of housing on offer will generate young people with nowhere to go – rubbish will collect in the ditches and under the hedges – again the LA is not going to be able to cope with this adding to the rubbish and debris already on these roads, which is very rarely cleared, eg a local resident goes along Croston Road and Leyland Lane with a plastic bag and is volunteering to pick it up herself. So much for Council responsibility.”</p> <p>General</p> <ul style="list-style-type: none"> <li>• Where are the long terms jobs for the new residents to pay their mortgages?</li> <li>• How many insurance companies will insure a home with a potentially 30ft tree standing outside?</li> <li>• Who wants to buy a house next to or back to back with someone who is on housing benefits and out of work?</li> <li>• Local supermarkets are too far way to walk with a family’s shopping – their car parks are full now at peak times and quiet times, their shelves are poorly stocked.</li> <li>• No local schools.</li> <li>• No health centre/clinic.</li> <li>• Dentist? Not enough NHS appointments, in Leyland now.</li> <li>• Hospitals at Chorley and Preston cannot cope (I am waiting for an urgent appointment for September when my specialist said he needs to see me but there are none available – how many others are being kept waiting?).</li> <li>• Public transport is slow (because of the traffic congestion in Leyland.</li> <li>• Earnshaw Bridge is lethal – you cannot cross any of the roads without a lorry driver gives way and holds up the traffic for you. LA and South Ribble Council had the chance to improve the junction when the pub ‘Leyland Tiger’ was demolished – instead they allowed the development of a block of apartments to be built and we all suffer the consequences now.</li> </ul> <p>As chartered surveyors you may not be accountable for the local road capability, safety of traffic junctions, road and footpath cleansing, maintenance of green corridors, ie hedges and trees etc etc, but in proposing a housing development like this one there comes a point when local authorities, councils, LCC and yourself have to take responsibility for the effects of such a development, collectively no passing it on between you and blaming each other.</p> <p>South Ribble Borough Council are wonderful at making promises but then don’t fulfil them. They are good at blatantly ignoring the suggestions of local residents. The government may well set targets but when those targets are generated out of want and greed rather than need and necessity someone somewhere has to take a stand and say no.</p> <p>If all the residential properties/living accommodation that exists in Leyland, Farington, Lostock Hall, Euxton and so on was sold there would not be a need of further development in the area. The new housing estate on Croston Road (opposite to your new proposed site) has houses for sale and yet when it was at this stage new growth for the economy and all the reasons you gave today</p>



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			<p>were given then – but where is the new economic growth that those houses were supposed to generate – why are half of them up for sale? We are Great Britain, not America or Canada with . . . (missing from photocopy received)</p> <p>I am aware that a high percentage of the issues I have raised are the LA and South Ribble responsibility but as the Development Team you also have a responsibility to the residents of the local community – you cannot keep on developing new housing developments on green fields (which produce the O2 that we need to breathe) when there are huge expanses of land left derelict by previous landowners whose buildings are now crumbling and which create a hazard for all concerned. One such site is at the side of the M6 motorway in Bamber Bridge. A massive weaving/cotton spinning factory has been left derelict for years – you could develop that area for a thousand new homes and add businesses in the local authority and current landowners could agree. That would improve the area and solve your housing problem three times over.</p> <p>Economic Growth</p> <p>Your Development Team today talked of lessons learned from the past, from history. That new affordable housing would create/generate economic growth.</p> <p>In the last 80 years this area has experienced exactly the opposite.</p> <p>As local businesses/factories have closed more housing has been built in its place. Eg the sites of Leyland and Birmingham Rubber Company, Leyland Paints, Leyland Motors (at least three sites), printing works, bleach works, car firms (Rover and Ford Motors), spinning, weaving, just to mention a few in Leyland (there were loads more in Lostock Hall, Chorley, ROF at Euxton now Buckshaw Village) have all given way to housing.</p> <p>In simple terms, in case anyone is not understanding this, I have . . . (missing from photocopy received) . . . the loss of thousands of jobs. How can 300 new houses (on top of what we already have) give us back the economic growth we once had.</p> <p>All the mill owners built their factories and then built the houses for the workers. It worked. All the history books tell us it did. My family existed on the strength of it. How you can honestly believe that the development you are proposing will generate economic growth (even a tiny bit) is beyond belief.</p> <p>But the jobs back first – then people will ask for the housing they need to sustain those jobs and then you can build. Unemployment in the local area is rising – you need to develop sustainable jobs for any future economic growth.</p> <p>Shortage of housing – I am not convinced – locally and nationally. Until people in ‘statistics’ land come out of their white towers and remove their rose coloured spectacles and look at the real issues this country will have no economic growth.</p> <p>Local Authority/Council promises</p> <p>When Heatherleigh was originally built, the piece of land backing onto Hugh Lane which you are proposing to build on – the local council promised a play area for children. All the local residents on Lowther Drive and Hugh Lane together with Heatherleigh thought it was going . . . (missing on photocopy received) . . . as everyone living there that the play area does not exist and yet you as the Development Team told us quite clearly this afternoon that the local council could be entrusted to do what you plan. What will you do when the local council does not maintain your green corridor – your team suggested today the residents could pay an extra fee each year for a private company to keep the green corridor tidy and maintained. Can the residents afford such an extra cost on top of their council tax? Why should they pay extra for keeping their neighbourhood maintained – presumably they will be paying Council Tax - but what for if they have to pay again for what the Council should be doing in the first place.”</p>
319	580	Chapter C - Policy C2 - Moss Side Test Track	<p>I have two main concerns about the proposed development of LTT. Firstly the two proposed access points on Longmeanygate. Both these sites are extremely close to two bad bends. One of these has seen accidents, two have been serious and one fatal. Many cars have gone through hedge into the wood between 153 and the chapel, and many going through the hedge at 188.</p> <p>It would appear that safety has not been considered. Secondly the drainage from the development. When the Test Track was constructed on farm land, the many drainage ditches were stopped or rediverted, and since then the area has been liable to flooding. Apparently the drainage from the proposed development is to go into the Wymott – this cannot be allowed to happen! The Wymott cannot take the water already draining into it. Therefore there must be new proposals for drainage and also for access from Longmeanygate. The obvious solution to traffic flow would be to re-open Midge Hall Station, and to put a roundabout at Midge Hall Lane junction and put in a road along the emergency access road by the Methodist chapel, giving direct access to the station and to Preston, Liverpool and Southport over the moss onto the Longton bypass.</p>
320	581	Chapter C - Policy C2 - Moss Side Test Track	<p>Before moving to Dunkirk Lane I lived with my parents on Longmeanygate. Over the years the road has become extremely busy and the traffic levels are too high already for the roads to cope.</p> <p>After looking at the proposed development, I was shocked to see an exit road been placed on an extremely bad bend.</p> <p>This part of the road has seen many accidents over the years, including my wife and mother been knocked down whilst pushing our two year old in a pram. My son has been left with permanent</p>

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			<p>scarring to his face and not to mention the post traumatic stress the family are still coping with.</p> <p>My wife also rides and keeps her horses on Longmeanygate at Mum's and at times has had to deal with drivers taking the bend too fast not knowing what's round the corner and nearly ploughing into the horses and this is a spot you say is a place to put an entrance/exit road!!! The only safe place would be next to the Chapel and by putting a roundabout there it would also calm the speed of the traffic.</p>
321	583	Chapter C - Policy C2 - Moss Side Test Track	<p>Although technically brownfield in planning terms, the site has a great deal of natural beauty, and has acquired a wildlife population since its previous industrial use has ceased. It is NOT urban in character, is bordering on the green belt, and it would be more consistent with its character to make it part of the green belt.</p> <p>I believe the council's thinking was originally to allow commercial builders to build over 1,000 houses on this site, and this has now been reduced to 750. This site is ringroaded by Longmeanygate Reiver Road/Titan Way/Paradise Lane (really continuations of the same stretch of road) and Dunkirk Lane. These single carriageway roads are hopelessly inadequate for the huge increase in traffic which would result from a large population increase into 750 more houses. Sufficient road building to meet this could not be done without great damage to the green belt and loss of good agricultural land.</p> <p>Commercial builders, who care nothing for the local people or environment, create only temporary jobs, and are constantly looking for excuses to allege that it would be more logical for the green belt boundary to be moved further West. (Reminiscent of the 1970s and 1980s). Do we really want ugly housing estates extending to the westward limits of South Ribble?</p> <p>Why should development have to mean yet another housing estate? The character of the site means it could be a great public amenity if developed into say, a park or nature reserve.</p> <p>The site has for years been hidden behind hideous reinforced concrete walls. Open it up and let local residents view it before making a decision.</p>
322	584	Chapter C - Policy C2 - Moss Side Test Track	<ol style="list-style-type: none"> <li>1. Midge Hall railway station should be a high priority in any scheme.</li> <li>2. Paradise Lane was built as a bus only route to the test track. When we sold some land for the road the New Town Corporation, with a condition that it was never made into a through road for two land traffic.</li> <li>3. No more traffic onto Dunkirk Lane as it is blocked at peak times and getting out from Paradise Lane is dreadful.</li> <li>4. Have you considered relocating the industrial units, eg Norlec, Council Yard, etc to the test track site so that the road could go through there?</li> </ol>
323	585	Chapter C - Policy C2 - Moss Side Test Track	<ol style="list-style-type: none"> <li>1. The extra volume of residential traffic is far in excess of the narrow country lane that is 'Longmeanygate'.</li> <li>2. The proposed access roads onto Longmeanygate are close to a very dangerous road bend which has been the scene of many RTAs over recent years. Extra junctions = more RTAs.</li> <li>3. The surface water drainage, open ditches and culverts along Longmeanygate are already inadequate during wet weather. Extra houses will only worsen the problem.</li> </ol>
324	586	Chapter C - Policy C2 - Moss Side Test Track	<p>I am concerned about the extra volume of traffic this development will produce and especially the two access lanes into Longmeanygate. The access lanes are near to very bad corners where numerous accidents have occurred, last year on two separate occasions cars ended up in the hedge bordering our house and a greater volume of traffic will only exacerbate this problem.</p> <p>This area also has a very large number of horses who use the roads. Most of us have already had near misses and again more traffic will make this worse. Even to get to the areas of off road hacking we have to hack along Longmeanygate which at certain times of the day is not sensible, even on the quietest, safest horse.</p> <p>The other is that of drainage. Our field and garden regularly flood already because the water does not drain away and the ditches back up and overflow. If surface water etc from the new development drains into the same drainage channels this will make an already bad problem, worse.</p>
325	587	Chapter C - Policy C2 - Moss Side Test Track	<p>Moss Side Forum – Test Track Meeting on 14/8/12 at 7.30-pm. There was quite a lot of people came to this meeting that expressed their wishes for Midge Hall Station to be opened before any new housing development went ahead on the Test Track. I support this request.</p> <p>It is hoped that new infrastructure for Moss Side would be implemented if and when this project goes ahead including a bus service that would be hoped to travel to Midge Hall Station. This would not only just be good for Moss Side but would also alleviate traffic to a great extent. I am very much in favour of this plan.</p>
326	588	Chapter C - Policy C2 - Moss Side Test Track	<p>LATE SUBMISSION - 17/8/12</p> <p>I currently live in the converted barn on the bad bend on Longmeanygate almost opposite the proposed access point. I currently have concerns regarding traffic volume, speed and heavy goods vehicles on this road without the addition of this proposed access. It may be worth a couple of the decision makers in this process to take a walk from 192 Longmeanygate past the barn for a few hundred metres on any given day prior to rubber stamping any decisions regarding this matter. You may choose to re-evaluate your plans post walk!!</p> <p>In addition to the points already made, I also have concerns regarding the wildlife living in the woodland opposite the barn. Any construction work would surely involve removing trees, not only</p>

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			<p>for access but for safety to avoid obstruction of view to vehicles exiting and entering this site.</p> <p>Currently there are owls which regularly fly across our land that live in this woodland as well as bats and – red kites amongst other species.</p> <p>The obvious entry to this site would be at the junction of Midge Hall Lane and Longmeanygate. A simple roundabout system would work very well and probably reduce the HGVs using Longmeanygate as a cut through to the industrial estate.</p>
327	589	NPPF	Please see identical representation Ref No: 86, ID 109
327	590	Vision - Rural Local Service Centre - page 8	Please see identical representation Ref No: 86, ID 110
327	591	Chapter C - Policy C5 – BAE Systems, Samlesbury	Please see identical representation Ref No: 86, ID 111
327	592	Chapter E - Policy E5	Please see identical representation Ref No: 86, ID 112
327	593	Energy Efficiency of New Development - Page 26	Please see identical representation Ref No: 86, ID 113
327	594	Chapter D - Policy D1 - Sites M, V & X	Please see identical representation Ref No: 86, ID 115
327	595	Chapter D - Policy D1 - Site Q	Please see identical representation Ref No: 86, ID 116
328	596	Chapter G - Policy G1	<p>Chapter D - Policy D9 - Land off Wham Lane</p> <p>My original representation on the Land Off Wham Lane, New Longton was submitted to you on 31 January (extract A attached). I followed this up with a letter to the Planning Department dated 19 September 2011 (copy B attached). This letter asked that you give consideration to a creative development idea using my late father's land in part for the benefit of the New Longton community. This would have involved 'loosening' the land's status as Green Belt for the purpose of investigating the possibilities. This letter was acknowledged in a general way by your Team Leader, Mike Eastham in his reply letter of 22 September 2011 (copy C attached), highlighting that the opportunity would arise in the period October to December 2011 to comment on the preferred sites. We never received a further response from you on our proposal. My email to you of 22 December 2011 (copy D attached) observed that our proposal had subsequently been relegated to 'non preferred' for no stated reason other than it had been 'filtered out'. While we understood that this is a euphemism for 'remains as Green Belt', our concern was that it never had the benefit of public exposure once deposited in an obscure appendix. Even so, we accepted our fate and were prepared to regard this as simply a sad day for New Longton.</p> <p>I write now having seen the final round of the consultation. I note from the 'Table of Changes between the Preferred Options and the Publication Versions of the Site Allocations etc' that ambiguous terminology corrections and green infrastructure boundary changes feature prominently. I therefore have to express further disappointment to you that such amendments are applied in the latest round and were not in the previous ones. I would appreciate some form of explanation.</p> <p>If it is the case that our proposal was too ambitious in its scale, we have since considered a small scale option (approximately 5 acres compared to the previous 20 acres) at the northern, Royalty Lane end of the plot. This has the merit of having existing buildings on three sides and could embody some of the original features addressing local needs (Policy D9), such as affordable housing and doctor's surgery. Is there any basis on which this alternative approach could be pursued, even at this late stage?</p> <p>On a further positive note, I can see that the overall planning process has much to commend it, being visionary and well structured.</p>
329	597	Chapter C - Policy C2 - Moss Side Test Track	<p>Introduction</p> <p>I have lived in Moss Side for over 25 years and consequently have an excellent knowledge of the local area and in particular the infrastructure challenges in the locality. I have represented the local community of Moss Side and Midge Hall as a borough councillor for nearly ten years and as a county councillor for in excess of three years. As a cabinet member at Lancashire County Council with responsibility for strategic planning, I have a good working knowledge of the infrastructure which is required in order to support major development sites.</p> <p>I am not expressing my views in great detail in this consultation response, but wished to set out an outline of them, which I would be more than willing to expand upon in the future.</p> <p>My Position</p> <p>A development upon the site of the former test track will inevitably be large in size and potentially huge in terms of its impact upon the local community. Whilst I have not opposed the potential development in principle, I have always argued that we must ensure that the development comes forward in such a way that its impact upon the locality is sustainable.</p> <p>On one of many occasions when I have spoken regarding this potential development, namely when South Ribble Borough Council was deciding whether to adopt the Development Brief in June 2010, I raised a number of concerns. These included :-</p> <ul style="list-style-type: none"> <li>• The road structure in the area is poor and would need significant improvement prior to the development being built.</li> </ul>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<ul style="list-style-type: none"> <li>• The proposed access points were unacceptable, as the principal access points were via an industrial estate and the secondary access points were from a very busy and dangerous road, namely Longmeanygate.</li> <li>• The impact the development would have on the public open space, in particular Paradise Park, as the plan showed the development to be taking place on part of the park. This, of course, would be unacceptable and would be opposed by the local community.</li> <li>• The number of properties proposed on the site and the density of the development, which had been based previous housing numbers which had been imposed upon South Ribble Borough Council regionally.</li> <li>• The lack of detail regarding proposed improvements to public transport.</li> </ul> <p>Whilst I accepted that the Development Brief was only designed to be indicative and illustrative, I believed it to be a poor quality document which did not take into account fully the local issues within the community. Because of my concerns above, I urged members of the Planning Committee not to adopt the Development Brief.</p> <p>My opinion has not changed in the intervening period. Indeed, if anything, the experience which I have gained in my present role during that time has strengthened my views.</p> <p>I am now firmly of the view that I cannot support the further housing development at Moss Side Test Track unless appropriate and necessary infrastructure is provided by the development. This must include the provision of major additional transport infrastructure and education facilities. We must seek planning obligations accordingly and all developer contributions collected must reflect these overriding requirements. I believe there needs to be significant improvements to the road network, for example the dualling of roads such as Schleswig Way, and major investment in public transport, to include the re-opening of Midge Hall Railway Station and the provision of bus routes linking the station to the residential and employment areas of Moss Side and Midge Hall.</p> <p>Whilst I accept that the map included in the Development Brief was indicative and illustrative, the access points for emergency access and cul-de-sacs off Longmeanygate are completely inappropriate, as they are at locations where visibility is extremely poor and on a road where the speed limit is 60MPH. That map should in my opinion be removed, as it is very misleading and potentially dangerous. If the development is to take place, then proper access routes should be provided to the site. Suggestions which have been made include a new road linking directly across to Schleswig Way from the site and a roundabout at the junction of Midge Hall Lane and Longmeanygate. These seem to be far better solutions, which would help to avoid excessive volumes of additional traffic on local roads as a result of this development.</p> <p>I still believe that the figure of 750 homes would represent an overly dense development. It can be seen on other sites which are proposed for development that the suggested densities are lower. If we apply the lower densities to this site, we would be nearer 600 homes as a figure.</p> <p>Further, this site is situated well away from the town centre and therefore is not well-suited to affordable homes. Therefore, it would be appropriate to build far less affordable homes at this location, but for the developer to make a contribution towards affordable homes in other locations. This may also reduce the number of homes appropriate to this site to around 500.</p> <p>Should the development take place, there would also need to be :-</p> <ul style="list-style-type: none"> <li>• more facilities for young people, including play facilities and leisure facilities</li> <li>• multi-use tracks throughout the site and linking with it, to assist cyclists and a very large (and growing) local horse-riding community</li> <li>• protection and improvements to Paradise Park</li> <li>• more medical facilities, shops and community facilities</li> </ul> <p>The potential additional employment use is of course to be welcomed, but this should be for high quality sustainable developments. It should also be to attract significant numbers of high value, highly skilled jobs to the local area. Alternative uses (other than employment/housing) for the site should also not be ruled out. Suggestions have been made, such as using it for leisure, recreation or as the site for a museum and hotel facilities.</p> <p>Conclusion</p> <p>A development on Moss Side Test Track will inevitably be large in size and potentially huge in terms of its impact upon the local community. In my opinion, it falls upon the local authorities to ensure that if the development is to take place, then the potential negative impacts are reduced to a minimum and that there are positive benefits for the local community. As the local councillor, I will continue to argue at every opportunity for this to be the case.</p> <p>I understand that the Highways and Transport master planning exercise is currently on-going. I believe that the progression of the Site Allocation should await proper consideration of the likely impact and preferred infrastructure solution. If the infrastructure requirements are not identified properly prior to the plan being submitted, there is a significant risk that it will be found unsound by the inspector, as the plan would be undeliverable.</p>
330	598	Chapter C - Policy C2 - Moss Side Test Track	<p>Introduction</p> <p>By way of background, Moss Side Community Forum is a body which represents the interests of nearly 7,000 people who live in Moss Side and Midge Hall. The views which are set out here are a summary of the views which were expressed by the local residents at a public meeting on 2nd August. They were approved as being a fair reflection of the comments which had been made on</p>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>2nd August by everyone at the subsequent Forum meeting on 14th August and adopted as the official view of Moss Side Community Forum. [However, it should be noted that, as a Planning Committee member at South Ribble Borough Council, Cllr Mrs Mary Green confirmed that she could not subscribe to this overall conclusion, as to do so would prejudice her position as and when the development may be determined by the Planning Committee.]</p> <p>Principal Concerns</p> <p>(1) The primary concern of the local community is the proposed access to the development. The suggested points of access were indicated on maps at the stage when the Development Brief was approved by the Planning Committee of South Ribble Borough Council (SRBC) in 2010 (although they were not available to residents until after the meeting). In particular, the proposal to have two access points from Longmeanygate as 'cul-de-sacs' or access for emergency vehicles has been met with widespread opposition. The proposed siting of the two points could not have been in a worse position if you tried, as they are positioned at very dangerous points along a fast-moving road, where visibility is restricted. It is the confirmed view of Moss Side Community Forum that these two access points must not be pursued further and also that the suggestion of these must be removed from all future maps, as this would represent an extremely dangerous and inappropriate solution to accessing (parts of) the site.</p> <p>(2) The other significant concerns can be listed as :-</p> <ul style="list-style-type: none"> <li>• The small number of consultation responses at earlier stages of this process indicate that SRBC's consultation process has not been as effective as it ought to have been.</li> <li>• Longmeanygate has a bad record in terms of serious accidents – in fact, much worse than the 'official' figures might show.</li> <li>• 750 homes would represent a development which is overly dense. Whilst an officer from SRBC suggested that this was not the case, the proposed densities of other large sites in Policy D1 are significantly smaller than that proposed for Moss Side Test Track. Applying the proposed densities at the other sites to this one, it would result in approximately 600 houses on the Moss Side Test Track site, a reduction of 20%.</li> <li>• The present infrastructure already cannot cope – for instance, the drains in the locality are completely inadequate. Recently, Longmeanygate was flooded and a number of homes suffered damage as a consequence.</li> <li>• There is significant wildlife on-site and it is believed that this would include certain species which have international protection afforded to them. It is believed that the development could have a detrimental impact upon the local ecology.</li> <li>• The two suggested access points from Longmeanygate would require large numbers of trees to be removed and could also impact upon the mound.</li> <li>• A previous map at the Development Brief stage showed part of the development to be on a section of Paradise Park. This is completely unacceptable to even consider losing part of a valuable green open space for the local community.</li> <li>• If 750 homes were built, this could bring an additional 2,000 residents to the locality. However, we do not have sufficient facilities to support the present population. Examples include the lack of school places and medical facilities in the local area.</li> <li>• The two proposed access points via the industrial estate would not be attractive for the purchasers of the new homes.</li> <li>• It is the view of the local community that two access points should be provided to facilitate the development. One should be a roundabout at the junction of Midge Hall Lane and Longmeanygate, linking to the test track site via the previous emergency access to the site. The other should be a new road north of and parallel to Dunkirk Lane, linking directly to Schleswig Way. This would have the benefit of avoiding extra traffic arising on the unsuitable Longmeanygate and the already busy Dunkirk Lane.</li> </ul> <p>If the Development takes place, what should the developer contributions fund?</p> <p>(1) The community is firmly of the view that if this development takes place, it will potentially have numerous detrimental impacts upon the local community. As such, it is the confirmed view of Moss Side Community Forum that all contributions from pots such as the Community Infrastructure Levy must be spent in the Moss Side and Midge Hall area, to mitigate against the negative impacts. It is strongly believed that to utilise CIL contributions on schemes such as the regeneration of Leyland Town Centre and the extension of Worden Park (as proposed by South Ribble Borough Council in paragraph 6.22) is totally unjustifiable when there is a clear need to fund infrastructure improvements such as highways and public transport in the local area.</p> <p>(2) The primary improvement which local residents firmly believe the contributions should fund would be to re-open Midge Hall Railway Station, to provide routes to Preston and Liverpool. This would help commuters and reduce the number of extra cars generated by the development and would indeed make the new homes more marketable for the developer. There would be a requirement for safe walking/cycling routes to the station.</p> <p>(3) The access to the development site should be via the new link road to Schleswig Way and the roundabout at the junction with Midge Hall Lane, referred to above. Further significant improvements would also be necessary to the highway infrastructure to facilitate this development. Without these, Moss Side Community Forum believes that the development would be undeliverable.</p> <p>(4) The other key improvements that should be funded by developer contributions are :-</p> <ul style="list-style-type: none"> <li>• More facilities for young people, including play facilities and leisure facilities</li> <li>• Multi-use tracks throughout the site and emanating from it, to assist cyclists and the very large local horse-riding community</li> <li>• Improved bus services to link the residential and employment areas of Moss Side to each other and to the new Midge Hall Railway Station</li> <li>• Protection and enhancement of Paradise Park, for the benefit of all local residents</li> <li>• Improved local community facilities, including enhancements to the community centre, additional shops, medical facilities and school places.</li> </ul>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>Conclusion</p> <p>Whilst some residents oppose any development on the site of the former test track, it is the overall view of the local community that the development could take place, but only if significant investment is made in to the local infrastructure prior to the development taking place. To proceed without this would cause unacceptably high negative impacts to the local highways infrastructure and the proposed access points suggested by South Ribble Borough Council are completely unacceptable due to them being highly dangerous. Putting it in simple terms, a development of this magnitude cannot be taken forward 'on the cheap'.</p> <p>If, alternatively, full investigations into the impact upon the local area are carried out, proper access routes are designed and implemented, Midge Hall Railway Station is re-opened, other major improvements are made to the highways infrastructure and to sustainable forms of travel and the environmental quality of the local area is protected and enhanced, then a development of reduced density could be feasible. The local community would be willing to work constructively with the local authorities to develop a well-considered development plan.</p>
331	600	Chapter D - Policy D1 - Site Q	<p>In the Lancashire Evening Post dated Thursday, 5/7/12 there is a small section buried on page 8, "Last Change to Have Say on Blue Print". The article refers to South Ribble and the Local Development Framework (LDF), and residents have until 15/8/12 to have their say on the draft. This is the latest communication, not communicated by SRBC, ie it has not appeared in any copy of Forward.</p> <p>We would like to make the following comments and ask questions of the LDF.</p> <p>Central Lancashire Core Strategy</p> <p>Longton is identified in Policy 1 of the Central Lancashire Core Strategy as a Rural Local Service Centre where limited growth and investment will be encouraged to help meet local housing and employment needs and to support the provision of services to the wider area (ie the Western Parishes). Longton has served this role for Western Parishes for the last 12 years in the South Ribble Local Plan.</p> <p>Why is it that because Longton has served this role for 12 years is it expected to continue to do so? Who identified Longton for this task? And now that we are encouraging local communities to determine policy why has this policy not been reviewed?</p> <p>Site Allocations &amp; Development Management Policies DPD</p> <p>The Site Allocations &amp; Development Management Policies DPD allocates approximately 200 new dwellings on land within the boundary of Longton, over the 15 year timeframe of the LDF up to 2026, which equates to 15 houses a year.</p> <p>Site Q is located within the existing boundary of Longton and the land has been allocated for residential development for 10 dwellings, which will be delivered over a 15 year period (ie the timeframe of the LDF) up until 2026. The land beyond the boundary of Longton is designated as Green Belt.</p> <p>The land is currently designated as "Countryside" on the Proposals Map of the South Ribble Local Plan. The "Countryside" designation is not being carried forward in the Site Allocations &amp; Development Management Policies DPD. However, the land west of Site Q has been allocated as Protected Open Land, so as to ensure that a large tract of land is retained as open land and is not developed for housing.</p> <p>On this occasion the allocation mentions that it will only be site Q that will be developed and that the land beyond will remain as countryside, this was the same comment when houses were built on Old School Lane. This type of comment is totally unbelievable.</p> <p>Social Infrastructure – schools, doctors, health centres</p> <p>School roles, and patient numbers at doctors' surgeries and health centres have increased across Lancashire. SRBC is in discussions with Lancashire County Council (as the education authority), the Primary Care Trust and the Health Authority over their respective capital programmes, to ensure that extensions to existing buildings, and the provision of new buildings, where necessary, are planned into the Local Development Framework (LDF).</p> <p>Is it not Government policy that infrastructure should be in place BEFORE development takes place?</p> <p>Transport Infrastructure</p> <p>SRBC is also working with LCC (as the Highway Authority) assessing the existing highway infrastructure and evaluating improvements to the network, including the completion of the Penwortham Bypass, the Cross Borough Link Road and the dualling of the A582. Any planning application(s) for residential development on Site Q in Longton, will need to be accompanied by a Transport Assessment, which will set out mitigation measures to alleviate existing highway congestion along Chapel Lane and School Lane.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>Congestion along Chapel Lane and connecting roads is a direct consequence of the Council's attempt to mitigate traffic management eg, the installation of chicanes; this caused a public outcry from local residents who once again demonstrated that their comments should be listened to by the council. The result being that several of the chicanes were removed; a complete waste of taxpayers' money.</p> <p>Drainage</p> <p>SRBC has consulted United Utilities and the Environment Agency on the Site Allocations &amp; Development Management Policies DPD (Preferred Options) and has worked with the two organisations on the Central Lancashire &amp; Blackpool Outline Water Study, which assessed surface water drainage and the wastewater infrastructure across Blackpool, Chorley, Preston and South Ribble – including sites in Longton. Where necessary, the Central Lancashire and Blackpool Outline Water Study recommends improvements to the existing wastewater treatment network and the surface water drainage network</p> <p>Is it not Government policy that infrastructure should be in place BEFORE development takes place?</p> <p>What consideration has been given to environmental issues? This land is an area of natural open countryside which has been uncultivated and subsequently a wild habitat which is home to a plethora of indigenous plants, birds and wildlife. Such open spaces are valuable to maintain the rural nature of the village in which we live and to create delineating spaces which prevent overcrowding, urban sprawl and the subsequent ruin caused by continuous building into pockets of space.</p> <p>I would like to share some comments from our diary with respect to this issue.</p> <p>9/2/12 At approximately 0930 hours saw three men dressed in grey and carrying clipboards walking around the close. I was suspicious but by the time I came downstairs they had gone. At approximately 1015 hours Mr Graham Gemson, Managing Director of Chelford, knocked on the door. He asked me if I was aware that the field behind us was scheduled for development and would be developed either by Chelford or Wainhomes. I said that I believed that it would be in about five years' time. He said no it was to be developed soon and that planning permission had been granted. He said that he would like to talk to us and the occupants at number 6 about access. He left a card and asked that we get in touch with a convenient time to talk.</p> <p>It this access was somehow resolved, the resultant increase in traffic onto the extremely busy underpass of Chapel Park Road and so close to the entrance/exit of Chapel Meadow, the entrance/exit to the close of houses on Chapel Park Road opposite and to the T junction with Chapel Lane would be untenable. Chapel Park Road is notorious for the speed which cars come from under the bridge into the corner, 2 accidents already have happened where cars have hit the fence at the back of 10 Chapel Meadow. Chapel Lane is also extremely busy and often congested this being exacerbated by the numerous chicanes. Additional traffic would tip the balance of this road's capacity to cope.</p> <p>29/2/12 Visited Debbie Roberts, at SRBC offices at West Paddock. We asked if the information from Mr Graham Gemson of Chelford was correct. Debbie Roberts informed us that this was incorrect, that planning permission had not been given and that the decision had not yet been taken as to which plots of land would be built on. We asked who had submitted it for consideration as building land. Debbie did not respond but we received a cut and paste response from Mike Eastham by email on 1/3/12 the text of which was from the LDF document. To date we have not had this question answered and ask again who applied for planning permission on what is now known as site Q?</p> <p>31/5/12 Noticed a number of men in hi viz jackets marked "P Houston CPS Services" on the access path to the land, further observation revealed others in the field. They were using theodolites etc. Why?</p> <p>2/8/12 Visited land registry to ascertain whether land had changed ownership. Not yet registered as having changed but apparently can take a long time.</p> <p>This whole situation seems very suspicious. The selection process does not appear to be transparent. Why did Chelford buy the land after all these years? Why are our questions to the council not answered? Can the local community reverse this decision that already appears to be a done deal?</p>
333	601	Chapter G	<p>Please note you already have a file concerning Rhoden House. The attached letter documents this. Other persons who were involved/helpful: H Hockenhull, D Porter, Rt Hon L Fullbrook MP.</p> <p>We are writing this representation to yourselves, regarding the South Ribble Borough Council forward development plan; concerning Rhoden House and its gardens and land.</p> <p>In addition to the file you already have, we would like to make the following representations and complaints.</p> <p>First some history.</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>1. The file you have contains the following:</p> <ol style="list-style-type: none"> <li>a. Initial complaint letter to SRBC dated 23/10/11</li> <li>b. Response from M Eastham dated 3/11/11</li> <li>c. Reply to yourselves 12/11/11</li> <li>d. Land registry documents</li> <li>e. You did not reply to the letter 12/11/11</li> </ol> <p>2. Since the letter dated 12/11/11 we have written to:</p> <ol style="list-style-type: none"> <li>a. Councillor Green</li> <li>b. Councillor Hughes</li> </ol> <p>3. Since no response was received from 1 and 2 above, we wrote to the SRB Member of Parliament and we have those letters on file. The complaints we forwarded are as follows:</p> <ol style="list-style-type: none"> <li>a. The land surrounding our property was classified on the 2000 plan as parks and other public open spaces, ie our garden. We have had to prove this was not the case and this will not change until the adoption of the new plan. This has cost us time and money as the property was up for sale and still is.</li> <li>b. There was no discussion or communication with ourselves as the landowners.</li> <li>c. Letters to yourselves and councillors received no reply.</li> <li>d. The new plan you have issued again has been compiled without discussion with us as landowners.</li> <li>e. An accidental meeting with Helen Hockenull did result in a response with some questions answered dated 19/7/12.</li> <li>f. The local MP was also consulted. She wrote on our behalf and did receive a belated reply.</li> <li>g. You have classified our property as Green Corridor, again without consultation or communication.</li> <li>h. The road (Rhoden Road) is privately owned by ourselves, it is a road and footpath combined. It is maintained by us, and is used by everyone in the area. It appears that this green corridor maintenance is funded by ourselves for the benefit of others.</li> <li>i. The open space owned by SRBC drains onto our land, this caused us problems as the ground and our septic tank becomes water logged.</li> </ol> <p>To summarise:</p> <ol style="list-style-type: none"> <li>1. You have not consulted or communicated with us as landowners and this has a direct effect on ourselves and our property.</li> <li>2. You expect us to pay for the continued maintenance of this facility.</li> <li>3. Your artificial mound which constitutes the public open space drains onto our property.</li> </ol> <p>We feel aggrieved by the above and a copy file of all correspondence, approximately 50 pages, is available.</p>
334	602	Chapter D - Policy D1 - Site S	<p>Redevelopment of land (your site SR015) off Brindle Road</p> <p>My first question is why have people not been informed on Brindle Road. I only found out through a third party (it's like the secret service with you lot).</p> <p>Second question. Where is the extra health care coming from, I struggle to see a doctor now (please tell me straight instead of your usual fudging around).</p> <p>Extra school places will be needed all costing the taxpayer more money.</p> <p>The motorway bridge is not designed for this amount of traffic. There are weight restrictions on it now although nobody takes any notice. The road is used as a short cut for vehicles of all types, including heavy wagons taking a short cut to the motorway.</p> <p>It is going to place a huge traffic problem especially on the level crossings where you have already allowed the building of 48 houses in the vicinity, it is already a bottle neck.</p> <p>Kellet Lane is far too narrow for all this traffic and yet again all this will be ignored in the quest for more council tax money.</p> <p>I know there will be a public enquiry and these builders always acquire a good lawyer which can beat the socks off the ones the council provide (so therefore it is cut and dried).</p> <p>Once again green land will be taken up for more houses.</p> <p>A blight will be put on the area especially when building commences and I for one will be pressing for a reduction in poll tax. We moved here to be in countryside, not to have the area becoming a money making poll tax for the council and live around a housing development site. We already have had one site developed at the back of us.</p> <p>Once again the council will run rough shod over us as usual.</p>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>Go to these so called meetings and the tax payer only gets an odd few minutes to put their views before they are told to sit down.</p> <p>Please answer my questions without fobbing me off.</p>
335	603	Chapter D - Policy D1 - Site S	<p>It has come to our attention that the land behind our houses has been identified as suitable for residential development and is likely to be built on by Persimmon Homes (Lancashire).</p> <p>We are greatly distressed by this news, not only will it take away our privacy but will devalue our property. Also Brindle Road has now become a very busy road, at times it's not easy getting out of our driveway for traffic. We hate to think what it will be like with another 218 – 240 houses here.</p> <p>Bluebell Way is another recent development on Brindle Road, when is taking all our green fields going to stop.</p> <p>How much more of our local countryside is going to become just more urban sprawl.</p> <p>We believe the land over the Hospital Inn crossing near Kellet Lane is also going for building houses. We aren't going to have any green belts left and certainly no wildlife.</p> <p>Why can't all the brownfield sites be developed before taking more countryside?</p> <p>Please reconsider this proposal and look forward to your reply to this letter.</p>
338	604	Chapter C - Policy C3 - Site W	<p>LATE SUBMISSION - RECEIVED 22/8/12 - Responses to Lea Hough questionnaire</p> <p>How can the masterplan be improved?</p> <p>The area currently has natural features due to its semirural location where roads and footpaths are designed for low traffic use. Any further building will cause these natural features and wildlife to become extinct.</p> <p>What type of housing do you think should be developed on the site? Do you think the site should provide affordable housing?</p> <p>Due to the location and its desirability, any proposed housing should be in keeping with the standard expected in a semi-rural location where most residents have worked hard to be able to live in such an area. Affordable housing should be left in less desirable areas where house prices and use of the local area will not be affected.</p> <p>How else do you consider the new development should be accessed?</p> <p>Bannister Lane should not be used to serve any properties due to its inadequate drainage and road width. The emergency access provision does not seem appropriate and if required should be kept to a cyclepath (single track) and not bollarded (full width) road which would be used as a rat run for residents on the proposed development to access Schleswig Way. Main access should be off Heatherleigh as provision for this was included when the road was installed and if a further junction is added off Croston Road then surely this is not required.</p> <p>Which transport measures do you support as part of the new development proposal?</p> <p>"Multiple Access points – Strongly Disagree.</p> <p>Works to Croston Road to slow traffic and improve pedestrian crossing points – Strongly Disagree.</p> <p>Low key, country lane style roads on site to reflect the character of the area – Don't Mind."</p> <p>Any further comments (Transport)</p> <p>The current traffic calming measures on Croston Road are already damaging residents' vehicles and causing unsafe driving practices. The emergency access point off Bannister Lane will be used as an illegal cut through and is not necessary due to the number of access roads and cycleways being proposed.</p> <p>Further comments (Public Open Space and Landscape)</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			Open public space in a residential estate will attract the wrong type of usage as can be seen already on the neighbouring estates such as teenage gang meeting place and litter dumping ground.
339	605	Chapter C - Policy C3 - Site W	<p>LATE SUBMISSION - RECEIVED 25/8/12</p> <p>I live directly in front of the proposed development on Croston Road/Heatherliegh Farington- Moss. I feel strongly that we should of been informed of the proposed plans and was only informed via a news paper report / fellow residents today . As our house would directly lose considerable value due to your development. I would like a questionnaire sent to my e-mail directly on receiving this. I am disappointed that there has been no information sent to ourselves at all until I received a letter from local residents today. Any loss of value to our property will be directly taken up with yourselves and the local council. Over the past year the residents of this area have been subjected to a reprocessing plant that devalued our properties and we also have to live with the consequences of this. Now the bullying techniques continue with the lack of information and destroying our area, quality of life and natural habitat. Yet again the residents of Croston Road have to put up with planners who have no insight into what quality of life and the needs or concerns of the inhabitants of the local area are.</p>
341	607	General	<p>LATE SUBMISSION - RECEIVED 28/8/12</p> <p>I have found it difficult to make a response as the period allocated was in the holiday season and time has been difficult to find.</p> <p>I would like to make a longer response and want to ask you to look at what is beign done elsewhere regarding sustainable developments. Places like Brighton and Eastleigh are seeing benefit in using agencies such as the BRE and their BREEAM Communities scheme to aid developers toward truly sustainable planning schemes.</p> <p>Using such an approach reduces time and expense on the local authority and also guarantees a sustainable outcome whcih is based on technical and scientific facts - not just opinions. They also include future proofing thinking to allow schemes to look as far ahead as possible. Every new development we approve is set for 100 years or so so we need to try to look ahead.</p> <p>I also think the majpor sites are completely wrong. The LDF seems to focus on new green field sites and ignores the obvious regeneration sites. This could make us guilty of moving from one mess to thye next so to speak.</p> <p>I would be plaesed to meet to discuss further.</p>
341	608	Introduction - para 2.23 Sustainability Appraisal	<p>LATE SUBMISSION - RECEIVED 28/8/12</p> <p>The information quoted is not available on the website. There is a response saying 'service unavailable'.</p> <p>Although sustainability is quoted as a common and main stream thread through the LDF there is no mention of what it actually means or how it is assessed and targeted. At some places it seems to suggest that the SRBC Officers will decide what is and what is not sustainable. This is not an acceptable method for making serious planning decisions. We need an accepted method which is familiar to developers such as BREEAM Communities which rely on professional and scientific guidance at every stage.</p> <p>We should set levels such as BREEAM Communities excellent, or very good, and require developers to achieve such standards as part of the planning agreement.</p>
341	609	Chapter A - Delivering Infrastructure - Energy	<p>LATE SUBMISSION - RECEIVED 28/8/12</p> <p>Nowhere is energy mentioned seriously and yet it is the key aspect of any future development and of any refurbishment and upgrade of any existing areas. UK and EU regulations require that within next 4 years (by 2016 for residential and by 2019 for all other) developments work toward 'zero carbon energy use'. How is this to be achieved here in South Ribble? How will any developer achieve such targets ?</p> <p>DECC have asked that District energy systems be installed in the UK . Where is this taken into account in the LDF ?</p> <p>Furthermore industry reports state that the UK runs out of natural gas in around 2 years time – a short timescale. However there is no mention of what should be used in its place in either new or existing buildings. This is a very important issue for EVERYONE in South Ribble but is not even mentioned in the LDF. We will rune out of our most commonly used and cheapest fuel shortly and will all be subject to fuel poverty and fuel shortages. Why is this ignored ?</p>
341	610	Chapter C - Policy C3 - Site W	<p>LATE SUBMISSION - RECEIVED 28/8/12</p> <p>A large scale housing development on edge of town green land is not a sustainable development. It will lead to dysfunctional communities and delinquency. This was tried in the 1970s in areas such as East Manchester and has been seen to fail badly. We need sustainable communities. The LDF policy should follow BREEAM Communities guidance, LEED Neighbourhood or similar.</p>
341	611	Chapter G - Policy G7, para 10.45	<p>LATE SUBMISSION - RECEIVED 28/8/12</p> <p>This focuses on plants and the green belt. It should also cover green energy and its role in the borough into next century. Our green land will not stay green unless we control CO2 emissions and use more 'green' energy.</p>
341	612	Chapter C - major sites for	<p>LATE SUBMISSION - RECEIVED 28/8/12</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
		development	<p>These include edge of town green field which should be retained as green field for as long as possible. Developments should centre on areas which have been built upon and become derelict such as the old Leyland Vehicles sites. All developments should be mixed use and follow sustainable guidelines aiming for targets such as excellent.</p> <p>The Wesley Street Mill and surrounding site should be a major redevelopment based on mixed use developments and should be an exemplar zero energy, zero carbon site to show what South Ribble aims to become across the borough eventually. It should achieve either excellent or outstanding target for sustainability.</p>
342	617	Process	<p>LATE SUBMISSION - RECEIVED 10/9/12</p> <p>I enclose my completed response form concerning the proposed building surrounding our properties. I feel very strongly about the fact that we were not directly consulted and we have now missed the deadline for the responses. I understand that you have carried out consultations in Sainsbury's but I have never seen anyone and I shop there every week. We wouldn't have known about the proposed building now if it wasn't for a concerned neighbour on Brindle Road.</p> <p>Cottage Gardens is a very small close and I feel that we could have been informed directly.</p>
342	618	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - 10/9/12</p> <p>I object to building on the green belt land which will destroy the landscape and the wildlife. There are also ancient oak trees on the land which the council pledged to preserve and prevented my neighbours from pruning them.</p> <p>I am concerned that we were not informed directly of the proposed building on the site hence we could not meet the deadline of 15 August. We only found out from a neighbour on Brindle Road this week.</p>
343	619	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION</p> <p>I am writing with objections to the proposal of building new developments around Brindle Road/Cottage Gardens. I have lived on this cul-de-sac since the small, quiet and friendly estate was completed. I am appalled that this will be compromised by the development of 290 houses in and around this area. Please forward all information that has previously been sent and please ensure a copy of all current information is made readily available so that I can make judgements as to how I will object. Through other members of the community I believe that correspondence/meetings/signs have been placed to inform all residents. I can assure you that I have received no information that supports this.</p> <p>When other meetings are arranged I would be grateful to hear of the dates so that I can attend. Any plans that are drawn please forward to my address/email therefore when needing advice I have all relevant information to refer to.</p>
344	620	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 6/9/12</p> <p>I am a resident of Cottage Gardens, PR5 6AG and I must express how disgusted I am that a neighbour has informed me and other residents about this proposed planning application for houses. Not one person on the estate or that I know along Brindle Road has been informed of this by the council. I think something of this importance/magnitude should be told by letter or in person by the relevant council so that all objections are heard from everyone involved. I think housing so close to the motorway is a joke and there are enough empty estates without adding more. This is not something we are prepared to take lightly and I'm sure if something of this importance was "withheld" from you then you would feel the same way. I will be doing everything in my power to find out where we stand on this issue and if any rules were broken by us not been given the relevant information. It was mentioned in a phone call to a neighbour that someone was in the supermarkets in Longton and Leyland asking peoples opinions on this.....what good is that when they wont be affected. You should have arranged a meeting involving all persons affected and cards should have been laid on the table so that a fair debate could have taken place. Is this why no-one has responded to my email about the vacant/empty disgusting property 257 Brindle Road?</p>
345	621	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION</p> <p>Where shall I start? How about 'Deception'!?</p> <p>On Monday 3rd September I discovered that there were plans in progress to build on the beautiful fields surrounding our home; once the grazing pastures for sheep and cows now the home to wildlife, such as pheasants, deer, foxes, eagles and other wildlife.</p> <p>Our family have lived on this development for 10 years. One of the reasons for our purchase was the beautiful surrounding fields which we were informed were Green Belt.</p> <p>I have to ask the question as a law abiding, tax paying, honest member of the South Ribble community, why if this 'planning' has been in progress for 2 years; did I not know about it until now?! Why did you not knock on my door (1 of only approx. 50 homes to be directly affected) and say 'Mrs Preston, thank you for paying your taxes, just to let you know...' A letter or an invite to a</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>meeting would have been a respectable and honest way of proceeding.</p> <p>A neighbour on Brindle Road made us aware by putting up notices on lamp posts, and she only found out by accident. I talked with our local planning contact at South Ribble, Zoe Harding, who has been most helpful, she confirmed that submissions of objections should be made by 15th August. Joy...</p> <p>2 years this has been going on apparently. I asked why we were not notified individually considering this proposed new development would be directly in view and presence of our homes and she said that letters were posted out in our vicinity (nobody on Cottage Gardens or Brindle Road here receive said documentation) and that notices were posted in local papers, and even she personally spent days in supermarkets – Booths (Penwortham and Longton), Sainsbury's (Bamber Bridge), Morrisons (Leyland and Bamber Bridge), Tesco and Leyland Market to raise awareness at each stage of the consultation. Not sure why Longton and Penwortham need to know about it! And I/we didn't see them in Sainsbury's and I shop there nearly every day!! ☹</p> <p>South Ribble Council are a deceptive dishonest disgrace!</p> <p>Now that I have that off my chest; it is most probable that we have no choice in this development now, as you have taken our freedom of speech away from us. But I tell you this, we (and I mean all the surrounding residents) will most certainly be reciprocating the 'dust and dirt' that you will be pushing our way, via our entitled freedom of speech.</p> <p>So far we have been in touch with our local MP, newspapers and environmental agencies. It has been interesting, however, to discover that of all the local councils South Ribble is the easiest to sway when it comes to Planning Permission... I shall have to dig deeper I think.</p> <p>We have many questions still i.e. access, state of the decades old sewerage and draining systems etc. I request that you forward me contact details of an individual who I can liaise with as regards to this matter.</p>
346	622	Vision - Locating Growth in South Ribble	<p>LATE SUBMISSION - RECEIVED 6/9/12</p> <p>Page 8 ref 3.6 makes reference to development in 'other places' indicating that in such places (which includes Hutton) development will be confined to small scale infill, conversion and local needs.</p> <p>Page 37 ref 7.38 states that a Greenfield site north of Liverpool Rd allocated for 45 dwellings is in line with policy 1 (f) as defined in the Core Strategy</p> <p>This council feel that there is a significant level of inconsistency between the two references and would suggest therefore that the potential development is removed from the 'Allocation of Housing Sites' so as to meet the generic policy statement as set out on Page 8 ref 3.6</p>
346	623	Chapter D - Policy D1 - Site N	<p>LATE REPRESENTATION - SUBMISSION 6/9/12</p> <p>This Council objects to the site allocation as above for the following reasons:</p> <ul style="list-style-type: none"> <li>• It is the view of Hutton Parish Council that housing development should be located near to employment in order to reduce carbon emissions emanating from increased travel to work. Since Hutton itself provides little employment it is our opinion that housing in the proposed location would be wholly inappropriate</li> <li>• It is the view of HPC that this proposed development also flies in the face of Hutton Village Plan 2007 whereby it was identified on Page 12 that there was a 'widespread resistance to further new development in the village especially on Greenfield sites. It was clear from various consultations that villagers are keen to retain the existing character and heritage of Hutton'. It was also stated that development should be 'limited to conversions or very small infill type plots' which supports the statement in the LDF regarding 'Locating Growth In South Ribble' as detailed above (Page 8 ref 3.6)</li> <li>• It remains the view of HPC that development of this site would create additional congestion on Liverpool Road in what is already an over congested area during the Grammar School starting and finishing times and when school events are held and that this would be detrimental to road safety. In late 1990 at a public enquiry relating to the SRBC Local Plan an Inspectors Report stated that 'of greater concern is the serious congestion and hazards to road users which are daily occurrences during school terms due to buses and cars stopping on the highway to load and off load pupils attending the Grammar School, provision of these facilities is a pre-requisite of development of the allocation land if an unacceptable increase in congestion is to be avoided but no acceptable proposal for these facilities has been achieved' It is fair to say that the position since 1990 has worsened with the expansion of Hutton Grammar School and that this Council can only see a marked further deterioration should this site ever be developed. The Council would suggest that the site is withdrawn.</li> <li>• This Council also considers that any alternative access via Anchor Drive would be equally unacceptable due to congestion in that area and the location of an existing housing development where residents would be adversely affected by any significant increase in vehicular movements.</li> </ul>



Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<ul style="list-style-type: none"> <li>• It is also noted that a small wood exists in the vicinity which would if removed have an adverse effect on the local visual amenity</li> <li>• It is also of concern that there are existing drainage issues in the immediate vicinity, regular flooding occurs during heavy rainfall and the site itself is believed to have a high level of water saturation. Development would therefore transfer substantial amounts of surface water into what is believed to be a drainage system which appears to be over loaded and unable to cope with existing peak rainfall situations</li> </ul>
347	624	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 10/9/12</p> <p>Shuttlingfields Development</p> <p>With regard to the above development, we are expressing our objection to the proposed development. Firstly we think it is disgusting that we have not been notified by the council of this proposed development. Why is this land being developed when we already have traffic problems in the area and we don't see how the local amenities can cope with further development, mainly schools and doctors surgeries. We already suffer from lack of light and sunlight at the front of the house due to the height of the trees which the council have refused to cut back. What effect will this development have on light at the back of the house.</p> <p>When are we going to be officially informed of this development and when are the council going to hold a meeting for the residents to voice their concerns?</p>
348	625	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 10/9/12</p> <p>I would like to object to the deveopment of green land behind Brindle Road, Bamber Bridge near to tha Hospital Inn Pub.</p> <p>Have you thought about the impact, once this is added to the approved planning this past year for Bamber Bridge.</p> <p>We as a family enjoy walking and seeing the wildlife, the conservation of wildlife in this area will be lost. There will be added pollution, extra wear and tear on the local land and roads. Increased traffic and the level crossing is aready very congested at peak times. Are there going to be extra services like Leisure Centre, Doctors and dentists? Why are current brown site not being developed first? The old mill in the centre of Bamber Bridge? All of the now empty and redundant pubs???</p> <p>Please do not ruin the future of our land for our generations to come, for such short term gains!!!!</p>
349	626	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 10/9/12</p> <p>I wish to make an appeal. Make the land involved in this planning proposal unsuitable and unfit for future building. This is an area of green, tree filled land I enjoy walking within and so do my children, We currently enjoy bird spotting with binoculars, weekly frog and toad hunting expeditions. Happiness and fun are some of the most enjoyable free and educational activities. Imagine the Christmas walk if you can? Vegetable's peeled ready to heat up. Turkey in the oven, two hours till carving. The children excited to be going for a country walk no driving needed, just hats, scarves, gloves and thick socks to tuck into boots. We all go into the cold, the whole family, off in the hope of seeing a pleasurable sight of deer running free in the fields. My family have had the pleasure of sighting deer on three occasions. Imagine 2015 Christmas day we can walk along the tarmac and look into the windows of the new family homes ear marked for the green and pleasant land. "Calm down deer"! your only going to be homeless?</p> <p>I like design, but I love good design. If you consent for building to be granted! Will you be able to make sure that the houses are of quality. Will the homes be self sufficient? No need for external services, solar and heating provided purely by own means/ Will each house have its own rain water harvesting systems? Will they have a swimming pool? leisure centre? Doctors? Dentist? Hows is the local school for space? If you the planning inspector have considered the good design of the planned area and land, I will assume you have a eye and ear for good design. Will the houses be build using off the shelf architectural styling of a mock Tudor style? if so you will have failed this green and pleasant walking area.</p> <p>I can think of three areas you could build/develop in within a three mile area which are brown field sites. You can drive round the local area for about an hour and find them. but you can't find as many areas to enjoy away from houses and cars. Green fields and trees don not seen to scare me as a parent when walking and caring for my three young children as walking on pavements next to the road.</p> <p>Simply leave the grass to grow!</p> <p>or as Rudyard Kipling makes a valid point if you care to read... Rudyard Kipling - The White Man's Burden</p>
350	627	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 22/9/12</p> <p>Could you please pass on to the Planning Inspector the concern I have that this large development will cause significant problems with traffic at the Hospital Inn railway crossing. Over the years each additional development has increased the problems at this point and an additional development of this size will make the situation intolerable.</p>
351	628	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 11/9/12</p>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>I have just heard that plans are afoot to build 290 new houses on the above site.</p> <p>I strongly object to this proposal on the grounds that you have already swamped this area with new properties in the last few years. The area was once attractive and the residents law abiding citizens.</p> <p>Over the last few years we have had all the industrial units built on Walton Summit right up to the railway line, this causes obnoxious smells and excessive noise at times. We also have had hundreds of houses built right up to our boundaries of Greystock Close - Bluebell Way. This estate extends from the M6 motorway right up to the level crossing at the Hospital Inn. We have also had Cottage Gardens, Craigflower Court, Hudson Court and also plans are ongoing opposite Hudson Court for more houses. What are you trying to do to us.</p> <p>Why not either demolish Wesley Street Mill or re-furbish it to make more homes rather than taking up more land to build, on what is an attractive area. There must be hundreds of properties for sale in the immediate area without the need to build more. People are not in a financial position in this day and age to be buying new properties.</p> <p>I hope common sense will prevail on this issue. You should be working together with the local residents instead of causing un-necessary conflict.</p>
352	629	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 12/9/12</p> <p>I write with regards to an application to build 290 private dwellings on fields off Brindle Road and Cottage Gardens, Bamber Bridge. I wish to express my strong opposition to this proposal. The taking away of such a small but beautiful green space is frankly a scandal. However my main opposition is with regards to the road infrastructure. The roads around the level crossing at Kellet Lane are unable to cope with the volume of traffic at peak times as it is now. It is not unusual for it to take up to 30 minutes at peak times to travel from Walton Summit to the Hospital Inn due to the crossing. The addition of more local traffic to this nightmare is quite simply madness. Please see sense and decline this application.</p>
353	630	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 12/9/12</p> <p>I would like you to note our objections to the proposed grant of planning permission to build 290 houses on fields to the rear of Brindle Road, Cottage Gardens and Stephendale Avenue being submitted under the Local Planning Framework</p> <p>The basis of our objections are as follows:</p> <ol style="list-style-type: none"> <li>1) As our property borders this land we will be significantly affected by any development undertaken</li> <li>2) To date, we received no written notification of the proposals</li> <li>3) Prior to purchasing the property in May 2011, the proposed planning application was not revealed on the local searches - clearly if we had been aware of this we could have made a more informed decision before completing purchase - as the main reason for purchase was the rural outlook to the rear of the property</li> <li>4) The impact on local wildlife will be significant - at present we see large numbers of birdlife, dragon flies, butterflies, frogs etc.. all living in and around the trees, hedgerows and watercourses on this land close to the brook at the rear of our property.</li> <li>5) If the development was to be completed, this would de-value our properties having lost the rear rural outlook</li> <li>6) There are potential flooding issues to properties on Stephenendale Avenue - we are already aware that the rainwater drains in the street struggle to cope with heavy rainfall - these drains all flow into the streams on the land proposed to be developed.</li> <li>7) Building houses close to the motorway - who's to say these will actually sell ? This creates further concern of crime as empty properties would attract potential of burglary, criminal damage etc. and this could lead to our properties being targeted as well.</li> <li>8) The existing trees and hedgerows all provide a natural screen and sound barrier from the the motorway - removing these will clearly impact on the noise levels around the area.</li> <li>9) The loss of privacy to the rear of our properties - one of the main reasons for purchase of property was that we were not overlooked.</li> <li>10) Traffic issues around the area - we are already aware that planning has just been passed for new housing on land that boundaries Brindle Road / Kellet Lane -this will increase the traffic around the immediate roads, particularly with the railway line crossing these roads - a further proposed 290 property development will clearly create further traffic and safety issues on the</li> </ol>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>surrounding road network.</p> <p>I look forward to receiving your comments to the above points and objections raised.</p>
354	631	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 13/9/12</p> <p>SR015 - Brindle Road, Bamber Bridge (Ref from Issues and Options Document)</p> <p>I would like to complain about the underhand way in which this change to the Local Development Plan has been publicised (or NOT!). It was by chance that I found the document. I have advised neighbours who all confirm that they knew nothing about this. The land owner states that they knew nothing about this either.</p> <p>Brindle Road, Bamber Bridge is already an extremely busy road; the crossing at the Hospital Inn causes delays and danger to traffic when cars pass stationary vehicles.</p> <p>Doctors have no or limited places on surgery lists, schools are practically full. You state that land bordering the M61 will not be available to build on due to traffic noise and amenity land will create a buffer between the motorway and houses. How will this be managed? What does this actually mean? What consideration will be made to the Public Footpath that crosses the land?</p> <p>It is stated that the land is not liable to flooding, but when so many houses are planned what effect will this have on sewerage and surface water? How will this be managed?</p> <p>Our home (a bungalow) backs on to the land affected by this plan and we will lose our privacy if and when houses (they are unlikely to be bungalows aren't they?) are built, our garden will be completely overlooked.</p> <p>I realise that the potential development will go ahead when the Public Inquiry is held, but would request South Ribble Borough Council to keep local householders FULLY aware of progress – and not expect us to simply fall on information ourselves.</p>
355	632	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 13/9/12</p> <p>Dear Sir's. I was rather horrified yesterday when I was notified by a neighbour that, there is an intention to build 290 houses on the farmland behind my home.</p> <p>Despite advised legislation; we have received no prior notification from SRBC and the proposed planning as just become aware to the local inhabitants, one month after objections and concerns should have been made to SRBC and closing the 15th of August. My first concern must be; why were we not notified of this planning application?</p> <p>My second and most important concern is that the sewerage system on Brindle Road is already overloaded and to the extent that in heavy rainstorms Brindle Road is flooded to a depth of 2 feet (700mm) with raw sewerage. This situation is already going to be made worse by the fact that planning permission as been granted to 40 new houses by the railway level crossing and being added to that system.</p> <p>When you consider the concerns expressed over Legionnaires disease, then even greater concerns should be shown over raw sewerage being sprayed over cars, (plus pedestrians and homes) when they pass each other, driving through the flooding.</p> <p>I have complained several times over the last 7 years regarding the problem and due to the near flooding of my home with raw sewerage on several occasions. The last flooding was 2 weeks ago and I have shown and given photographs and video film of that occurrence to the various concerned authorities and including SRBC. The photos and video show the manhole cover on the pavement, blown off by the water pressure. The extent of flooding along Brindle road, About 100 yards (100Meters). Cars driving through the flooding and spraying each other. (Completely covering the cars). The following day with the manhole cover on the pavement and human body waste still apparent.</p> <p>Also traffic concerns must be expressed when you consider the amount of extra traffic that will be generated trying to access the motorways that are on the other side of the level crossing on Brindle Road. I await your reply with interest.</p>
356	633	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 11/9/12</p> <ol style="list-style-type: none"> <li>1. Why develop green fields when there is a large site waiting for housing on the old Milk Marketing Board which has not been eagerly snapped up by developers!</li> <li>2. Our privacy to the rear of our house will be non-existent if the development takes place.</li> </ol>

Reference	ID	Which Policy/Site/Chapter/Paragraph	Comments
			<p>3. Although you “don’t buy the view” houses near to ourselves would shatter the outlook.</p> <p>4. At a time when the housing market is stagnant, what is the sense of a large development like this!</p> <p>5. Surely keeping green fields and ponds and all the wildlife we see must be something that has a big impact on this development.</p> <p>6. What about sewerage! The main drain down Brindle Road is very old and only just copes with sewerage from our housing site. Never mind a new large development.</p> <p>7. Traffic is bad at most times especially breakfast, dinner and tea. All these extra cars when the crossings are down will have a big impact on the flow to Walton Summit and the motorway.</p>
357	634	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 13/9/12</p> <p>I have just found out you intended to build houses in Stephendale Avenue without talking to the residents, who have been here over 50 years and of course we object. There will be no green belt of lovely trees to see, plus you have never discussed the plans. Why were we not informed by you? A neighbour to inform us from Cottage Garden Centre and Stephendale Avenue. I think it is really bad of you. I hope you reject the proposal.</p>
358	635	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 10/9/12</p> <p>As a resident in Cottage Gardens. Firstly. Not one resident of this road has been informed of this future development, why? This development completely encircles Cottage Gardens, destroying habitat, and the environment. Completely ruining the open aspect that all the residents enjoy. This project has been handled extremely badly by SRBC and has been in my opinion kept secret from the residents in the vicinity of Brindle Road areas.</p> <p>It is no use saying that notices were placed in local supermarkets (we go to supermarkets to buy food, not read noticeboards). Also, placing in local papers is no use as not everyone buys local papers. Another key area is drainage. The drains in this area are old and cannot take the amount that this proposed development will produce. As for the date below, this should be amended to allow everyone to raise their objections.</p>
359	636	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - RECEIVED 14/9/12</p> <p>It has been brought to my attention that planning permission is being sought for land behind Grey Gables Farm.</p> <p>Living at 279 Brindle Road I am surprised that I have not been informed by letter of this possible development.</p> <p>Leaving and returning to my property is already difficult because of the amount of traffic on Brindle Road. This is compounded by the proximity of the railway crossing. At peak periods traffic backs up when the crossing is closed.</p> <p>The area being considered for development is also crossed by public footpaths which would have to be retained.</p> <p>Brindle Road was never intended to be a main access road and I therefore request that this application be refused.</p>
360	637	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - Received 16/9/12</p> <p>This is the only form I can find to return to you regarding the building of approx. 290 houses situated at the back of Cottage Gardens.</p> <p>I am so disappointed that I have not been informed . I have been informed by a neighbour that there will be a road at the side of my house. A house that I have paid a premium price for. because off its location. If I wanted to be part of a huge housing estate I would have bought else where. I have a child and I would question the safety of such a road.</p>
361	638	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - Received 17/9/12</p> <p>As a near neighbour to the proposed site, I wish to express my concerns with regard to the amount of development that as been undertaken and is proposed in our area in recent years. We have had more than our fare share, on what once, was a quite rural area when we first took up residence in 1968. It was a pleasure to live here, but is now becoming more stressful with the increased volume of traffic etc. We did expect changes but the density of development is becoming to much. We have had Five developments completed and Two more in the pipeline.</p>
362	639	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - Received 17/9/12</p> <p>1. The builder of our bungalow told us that the land behind our bungalow was unsuitable for building because the land was low lying and not fit for drainage purposes.</p> <p>2. During heavy rain Brindle Road is often flooded and overflows into Stephendale Avenue due to inefficient drainage. This then drains into the field at the back of the bungalows and our inspection tank overflows covering the garden in effluent, etc.</p>

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			<p>3. Brindle Road is very busy with traffic coming from Gregson Lane due to the level crossings and motorists taking a shortcut to the motorways. A further increase in housing would add to this congestion and poor air quality.</p> <p>4. This area has always been considered Breen Belt and further development would cause a beautiful area to be spoilt.</p>
363	640	Chapter D - Policy D1 - Site S	<p>LATE SUBMISSION - Received 29/9/12</p> <p>I am writing to object to the above planned development. I was only recently made aware of it after seeing posters put up by a neighbour on Brindle Road and cannot understand why we did not receive notification of this.</p> <p>I have lived in this area all my life; in Stephendale Avenue from birth until I was 22 years old and in Cottage Gardens for the past 11.5 years. I chose this road due to its peaceful location and the fact that it is surrounded by fields full of wildlife. I do not want to look out over hundreds of houses.</p> <p>My main concern is the increase in traffic, both volume and noise, with most households these days owning two vehicles. Brindle Road and Kellett Lane are currently busy enough and the railway crossings at the Hospital Inn already cause long delays. Children cycling/walking to the various schools in the area will have to take extra care.</p> <p>I am not sure where the access points to the site are to be located, but these too will cause further traffic problems. I do hope that there will not be an access via Cottage Gardens. This would prevent the children playing out and will cause excess noise.</p> <p>There are so many unsold new properties in the surrounding area, why do we need more? I understand there are also to be houses built on Brindle Road just over the railway crossing.</p> <p>I would be grateful if you would show this letter to the Inspector next year.</p>
364	641	Chapter C - Policy C3 - Site W	<p>LATE SUBMISSION - Received 19/10/12</p> <p>As a resident of Farington Moss I wish to make objections against the proposed residential development along Croston Road, the details of these objections are as follows.</p> <p>Use of Green field land</p> <ol style="list-style-type: none"> <li>1. The proposed development area includes agricultural grazing and land used to grow crops on, before land of this type is used alternatives should be explored particularly the use of brown field or land that was previously used for industrial purposes. Land of this type may be earmarked for employment use but considering the economic downturn the council should consider if this will ever be a reality.</li> <li>2. As a regular walker around this area many of the hedgerows and fields are home to birds, ground nesting birds and many other wildlife which will be significantly affected by any residential development.</li> <li>3. The development at Buckshaw should be completed and all housing built and occupied before any further large scale residential developments are approved, particularly on green field land.</li> </ol> <p>Environmental Concerns</p> <ol style="list-style-type: none"> <li>1. With summers getting progressively wetter, and expected to do so for the next 10-20 years, the loss of such large open ground areas capable of holding rain water as a buffer into the rivers would be extremely detrimental to properties surrounding the River Lostock. With dwellings further downstream of the proposed development already being flooded this year by the River Lostock any reduction in this buffer land will only increase this risk.</li> <li>2. As a resident of the Barn Hey drive development it is easy to see where developers have blocked natural drainage ditches, causing trees to be sat in permanent 'baths' of water. Indeed most of the original trees that were in my own garden from before the development, died presumably because they are now sat in a permanent pool of water, water can be found by digging down just a few centimetres even during dry summers. I have no reason to believe that the new development will be any different.</li> <li>3. Vehicles waiting at the junction of Longmeanygate, Golden Hill and Leyland Lane sometimes for long periods causes increased pollution.</li> </ol> <p>Traffic and safety Concerns</p> <ol style="list-style-type: none"> <li>1. This area of Leyland in my opinion is particularly poor for public transport resulting in more people using cars.</li> <li>2. The junction of Longmeanygate, Golden Hill and Leyland Lane is dangerous for drivers, pedestrians and cyclists in particular:- <ul style="list-style-type: none"> <li>• The junction is too narrow and the continued development has brought more traffic than the junction can cope with particularly at peak times.</li> <li>• Pedestrians crossing the roads are in blind spots due to the junctions being set back to allow vehicles to swing in.</li> <li>• There are no pedestrian crossing facilities.</li> <li>• Children walking to school have to cross one of the roads at this junction or at the equally dangerous roundabout at Flensburg Way and Croston Road.</li> <li>• The tight turn particularly for buses turning right off Leyland Lane into Golden Hill, results in the bit of the bus in front of the wheels passing over the top of the pavement resulting in pedestrians waiting to cross, jumping out of the way of moving buses.</li> </ul> </li> </ol>



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			<ul style="list-style-type: none"> <li>The layout of the junction confuses some people.</li> <li>Cars waiting to turn right into Leyland Lane from Golden Hill Lane and Longmeanygate are prevented from doing so by oncoming traffic, the very short filter time makes turning right here a frustrating experience and can cause delays for other traffic stacked behind them. As a driver who almost daily turns right out of Golden Hill Lane into Leyland lane, it can be a scary moment when you are sat in the middle of the junction waiting to turn right and all the traffic from the left starts moving towards you.</li> </ul> <p>3. If the development does go ahead the council should consider forcing the developer to make vehicular access off Flensburg Way and installing a new roundabout on this road, this will also reduce the speed of traffic on Flensburg Way.</p> <p>Other Factors</p> <ol style="list-style-type: none"> <li>There is a real lack of facilities particularly for Children, no new playground was provided when the development around Barn Hey drive was built, indeed the one playground that was in the area adjacent to Heatherleigh had its equipment removed apparently because the supplier was not paid. The cumulative effect of these developments needs to be taken into account and new facilities provided, not just the size of individual developments.</li> <li>Croston Road traffic calming measures whilst being somewhat effective in reducing driver speed particularly during the day, the measures themselves appeared to cause more damage to the road surface around them with drivers hitting the same spot continually. Extra traffic will only increase this wear and tear.</li> </ol> <p>I would be grateful if these objections could be formally logged and taken into account in any planning approval process.</p>
365	642	Chapter C - Policies C2 and C3 - Sites FF and W	<p>LATE SUBMISSION - RECEIVED 23/10/12</p> <p>I am writing to oppose the proposed LDF site W and FF for the following reasons:</p> <p>Already I find traffic heading both to the motorway and into Leyland via Croston Road to be heavy particularly during morning rush hour. Additional houses to this area can only increase this pressure.</p> <p>We moved to our current home for a number of reasons which included easy accessibility to motorway networks and schools. This proposed development will undermine this.</p> <p>On that note I would be interested to hear how you intend to fulfil the needs of these additional households within the current infrastructure of the town? Will you be building additional schools, GP surgeries, NHS dental practises etc? And if so where will these be placed and to what cost on our town?</p> <p>Children today seldom see green fields because of this current fashion of dumping new houses in every available patch of grass. Given the new developments on Buckshaw village, Next to Morrisons and next to Centurion Way is a further large development really in the best interests of our town? I think not. Especially when many of these are still unsold.</p> <p>Actually, when the estate I live on (see address below) was built, in the original planning it was agreed a swing park area would be built for the children to use. Clearly this has not happened. Can you answer why this is? Would similar false promises be made to win over the local residents then remain unfulfilled at a later date?</p> <p>I am also concerned as to the environmental impact of this proposed development. After recent heavy rain and flooding of footpaths around this area, the removal of hedgerows and disturbing of this land is likely to have a detrimental impact on here and surrounding areas, in terms of further flooding. Not to mention destroying of local wildlife.</p> <p>Currently these areas are also used by ramblers and dog walkers. If these proposed sites are to go ahead you are forcing people back onto the roads. In an age of such obesity is it in the best interests of our residents to remove footpaths and off road walking areas?</p> <p>I would ask that you lodge this letter as an opposition to these sites, and acknowledge receipt of this letter in the first instance. Furthermore I would like a response in writing (via email is sufficient) to the points I have raised.</p>
366	643	Chapter D - Policy C3 - Site W	<p>LATE SUBMISSION - RECEIVED 24/10/12</p> <p>I object to the proposed development, in particular the proposed development of 650 houses on land stretching from Heatherleigh to Moss Lane. I object to the fact that the local government officers of South Ribble have underhandedly proposed this development without notifying affected residents in the area of its intentions, they may argue that it has been featured in the local press but if you don't subscribe to the paper then you remain ignorant of the intent, it is surely incumbent on the proposers of a development to make aware, by all means necessary, their intentions so that objections can be registered.</p> <p>My objections consist of the following:</p> <ol style="list-style-type: none"> <li>Infrastructure: The roads surrounding this development are already at full capacity and with a potential for 2000 additional vehicles from this development alone I seriously question its viability. If the traffic from the other proposed development, at the old Leyland Motors test track, is added in then this will impact the already overloaded roads. Croston Road is already a rat run with traffic choosing to forsake the queues on Flensburg Way, add to this the traffic generated by the Global Renewables site plus the traffic from the Barn Hey Drive development and it is quite</li> </ol>

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			<p>obvious that the roads were not designed for this volume of traffic. (It might be argued that the increase in traffic is less than 1% but this is against a traffic census undertaken within the last couple of years not against the census that brought about the creation of Flensburg Way and Farington Road.)</p> <p>I also have concerns that the current drainage system will not cope with the addition of the proposed number of residences. I fear that with the loss of this land to development that the natural areas of drainage for rainwater will lead to areas susceptible to flooding, as was the case in Fylde Avenue, as a result of development of what could be described as flood plains, in this case Barn Hey. You only have to look at the news reports of recent flooding up and down the country to realise that the areas of flooding occur where over development of areas of natural drainage have been allowed.</p> <p>2. Amenities: Are the current doctors, dentists, schools, etc, expected to cope with the increased demand or will this require further planning proposals.</p> <p>3. Environment: The proposed development will seriously reduce the amount of green belt land available with its impact being felt on the wildlife within the area, added to this is the potential for increased air, light and noise pollution together with an already present problem of littering along Croston Road.</p> <p>4. Asset Values: The owners of properties within the proposed development have already seen the value of their assets dramatically affected by the development of the Global Renewables site and this proposal will only compound this negative effect.</p>
367	644	Chapter C - Policy C3 - Site W	<p>LATE SUBMISSION - RECEIVED 25/10/12</p> <p>I am a resident of Hugh Lane, Leyland, and I am writing to you in order to raise my concerns about the planned development of land off Croston Road in Leyland.</p> <p>The first time I became aware of the development proposals was around August of this year. This was when I received a flyer through my door inviting me to attend the public consultation for the development. I had not heard anything or seen any notification that such development was to take place before this leaflet appeared. Naturally I was concerned and attended the meeting. During the consultation I learnt that there was apparently planning in place for the building of over 1,500 homes. Apparently the timing of the meeting gave residents less than a week to object using questionnaires handed out.</p> <p>I am aware that homes need to be built but the proposed area is not what I would deem as being suitable for such a large number. If we go with the numbers proposed, the first phase of development will see around 600 homes constructed. I don't know how the existing roads will support such large volumes. At present the surrounding main arterial roads are gridlocked at peak times. Hugh Lane, where I live, I usually a quiet street. However, at peak times motorists use this and Lowther Drive as a cut through to miss the traffic light junction situated at Golden Hill Lane and Croston Road. This is already a concern as vehicles speed through an area where children play. It is a matter of time before a child is knocked down. With the increased traffic flow I see this risk as being increased many times over.</p> <p>One of my other main concerns is flooding. I know from experience that the area around Hugh Lane already has problems with drainage. My own garden has been continually waterlogged for most of this year, so much so that I am looking at possible drainage solutions. With the loss of fields off Croston Road to the development the problem will no doubt be exacerbated. I was told at a recent residents' meeting that the fields off Croston Road are currently flooded. Also the River Lostock is at a very high level and is of concern to nearby residents.</p> <p>As Leyland is now a much smaller town than it was in terms of industry, and as the present economic climate is so bad, where are the new residents going to work? Where are the children going to go to school, and where are the families going to shop? I haven't seen or heard of any planned developments for schools, roads or shops.</p> <p>I'm not completely against the development but it seems that there are other local sites, actual brown field sites that can be used. One that comes to mind is the derelict Leyland test track. I believe this is already up for consideration as is termed as site 'FF' with the Croston Road site being 'W'.</p> <p>I would hope that you consider my objections as I see major knock on effects for the area. I'm sure that if more people realised what the actual impact of the developments meant then they too would complain.</p>