



**Local Development Framework
Central Lancashire Core Strategy**

**Submission Core Strategy
Regulation 30 (1) (e) Report:
Summary of main issues raised at
Publication Stage**

March 2011



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SUBMISSION CORE STRATEGY REGULATION 30 (1) (e) REPORT: SUMMARY OF MAIN ISSUES RAISED AT PUBLICATION STAGE

Introduction

1. The Publication Core Strategy was made available for the receipt of formal representations between 8th December 2010 and 31st January 2011. The purpose of this report is to fulfil Regulation 30 (1) (e) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 by stating the number of representations made and giving a summary of the main issues raised.
2. A total of 417 individual representations were made to the Publication Core Strategy from 121 respondents in accordance with Regulation 28(2). In addition, 33 representations from 5 respondents were received late and therefore not in accordance with Regulation 28(2).
3. The remainder of this report identifies and summarises the main issues raised in the representations which would be likely to bear on whether the Core Strategy is sound. It should be noted that not all representations related to one of these main issues, hence this is not an exhaustive description of all the representations made. The representations are reproduced in full on the Central Lancashire website (www.centrallancashire.com).

Locating Growth

4. A number of comments were made regarding the approach taken in the Core Strategy towards locating growth, as set out principally in Policy 1. Some representations were critical of the Core Strategy for reducing housing requirements (a point further developed in representations made against the Housing Delivery policy: Policy 4) whilst retaining economic growth aspirations: elements of this comment are repeated in respect of Policy 9: Economic Growth and Employment. Most representations into locating growth challenged aspects of the settlement hierarchy, including the proposed status of particular settlements, and the proposed locations for development. Particular challenges were made to absences from the list of Strategic Sites and Locations of land at Pickering's Farm in South Ribble and Higher Bartle, Preston.

Table of representations made on Locating Growth

Representation	Respondent	Respondent Organisation
11	Janet Dixon	Kiernan Construction
14	Janet Dixon	Mr W Dobson
17	Steven Abbott Associates	Trustees of the Worden Estate
21		Natural England
23	Emery Planning Partnership	Maxy House Farm
24	GGA Associates	Leyland Garden Centre
25	Mr Ellis	
26	Mr Hebson	
29	Mr D Hall	
30		Highways Agency

Representation	Respondent	Respondent Organisation
34	Mr & Mrs Semley	
40	Mr Holden	
42	Mrs Holden	
44	Mr G Love	
46	DPP	University of Central Lancashire
47	HOW Planning	Tetrad plc
48		Bovis Homes
49		Whittingham Parish Council
51/73	HOW Planning	Taylor Wimpey
53	HOW Planning	Arley Homes
55	CAPanning	Mrs S Groves
56	P Wilson & Co	Bee Lane Consortium
57/58	Nathaniel Lichfield Partnership	Taylor Wimpey
61	McAteer Associates	Morris Homes
63	Dickman Associates	Taylor Wimpey
65		Land4Homes
68	Mr M Mullarkey	CAPanning
69		United Utilities
70/74		Fox Land Property
71	DPP	David Wilson Homes NW
72	Sigma Planning	Hallam Land Management
76	Mrs L Williams	
80	Indigo Planning	Royal London Asset Management
81	Indigo Planning	Telereal Trillium
85	Indigo Planning	Deepdale
86	Mrs L Wilson	
87	Indigo Planning	Commercial Estates Group
89	Leith Planning	Campbells Limited
90	Entec	National Grid
91		The Coal Authority
94	Mr P Robinson	Mr PC Watson
95	RPS	Persimmon
96	GVA	Taylor Wimpey
97	De Pol Associates	Rowland Homes Limited
98		P Wilson & Co
99	De Pol Associates	Eastway Nurseries
100	De Pol Associates	Land Owners North of Durton Lane
102		The Ramblers Association
108	Steven Abbott Associates	Fairport Developments Limited
111		English Heritage
112		TB Planning
113		Parr Hall Farm
115	Mr M Shah	

Infrastructure

- Representations on infrastructure relate mainly to Chapter 6 of the Core Strategy and Policy 2. Concerns relate to the Councils' evidence base for its Infrastructure Delivery Schedule, and the need to apply a flexible approach to development viability in current market conditions. Some representations argued that Policy 2 lacks sufficient detail and is premature without the additional research required to set a levy/tariff for infrastructure provision.

Table of representations made on Infrastructure

Representation	Respondent	Respondent Organisation
21		Natural England
30		Highways Agency
32		Sport England
46	DPP	University of Central Lancashire
48		Bovis Homes
51	HOW Planning	Taylor Wimpey
57/58/59	Nathaniel Lichfield Partnership	Taylor Wimpey
71	DPP	David Wilson Homes NW
80	Indigo Planning	Royal London Asset Management
82		Lancashire County Council Property Group
85	Indigo Planning	Deepdale Co-ownership Trust
89	Leith Planning	Campbells Limited
112		TB Planning

Housing Delivery

6. Several representations were made on Policy 4, especially focusing on the Councils' proposal to reduce house building by 20% below the RSS requirements. Respondents argued that the Councils do not have evidence for the reduced requirements, which are inconsistent with the economic growth aspirations of the Strategy. They typically call for the RSS figures to be applied for the full period of the Core Strategy, and for related changes to be made to the reasoned justification for Policy 4.

Table of representations made on Housing Delivery

Representation	Respondent	Respondent Organisation
12	Janet Dixon	Mrs E Derbyshire
13	Janet Dixon	Mr & Mrs PW Swift
23	Emery Planning Partnership	Maxey House Farm, Bartle
30		Highways Agency
33	Drivers Jonas Deloitte	Northern Trust
47	HOW Planning	Tetrad Plc
48		Bovis Homes
51	HOW Planning	Taylor Wimpey
53	HOW Planning	Arley Homes
55	CAPanning	Mrs S Groves
57/58/59	Nathaniel Lichfield and Partners	Taylor Wimpey
61	McAteer Associates	Morris Homes
63	Dickman Associates	Taylor Wimpey
65		Land4Homes
66	HOW Planning	Tatton Settled Estates
68	CAPanning	Mr M Mullarkey
70/74		Fox Land Property
71	DPP	David Wilson Homes NW
72	Sigma Planning	Hallam Land Management

Representation	Respondent	Respondent Organisation
77	Sedgwick Associates	Wainhomes and Hollins Strategic Land
88		Lancashire County Council
93		Lancashire CPRE
94	Mr P Robinson	Mr PC Watson
95	RPS	Persimmon
96	GVA	Taylor Wimpey
97	De Pol Associates	Rowland Homes Limited
99	De Pol Associates	Eastway Nurseries
100	De Pol Associates	Landowners North of Durton Lane
101	Turley Associates	Redrow Homes
106	Steven Abbott Associates	DKH Developments Limited
107	Steven Abbott Associates	James Harts
108	Steven Abbott Associates	Fairport Developments Limited
109	Steven Abbott Associates	Staplefields Limited
112		TB Planning

Affordable Housing

7. Representations expressed concerns about the proportion of affordable housing provision required on market housing sites (set in Policy 7), arguing that site specific evidence of viability should be applied flexibly.

Table of Representations on Affordable Housing

Representation	Respondent	Respondent Organisation
41		Grimsargh Parish Council
47	HOW Planning	Tetrad Plc
48		Bovis Homes
51	HOW Planning	Taylor Wimpey
53	HOW Planning	Arley Homes
57/58/59	Nathaniel Lichfield and Partners	Taylor Wimpey
61	McAteer Associates	Morris Homes
63	Dickman Associates	Taylor Wimpey
66	HOW Planning	Tatton Settled Estates
71	DPP	David Wilson Homes NW
72	Sigma Planning	Hallam Land Management
89	Leith Planning	Campbells Limited
93		Lancashire CPRE
96	GVA	Taylor Wimpey
118	Cllr. M Devanney	
119	Cllr. M Muncaster	

Employment Premises and Sites

8. Respondents stated that Policy 10 is unclear and that it sets onerous and restrictive tests for the release of employment sites for other uses. Comments focused on the

need to align with national policy, the need to improve the evidence base, and the need to apply greater flexibility for changing economic circumstances.

Table of Representations on Employment Premises and Sites

Representation	Respondent	Respondent Organisation
30		Highways Agency
47	HOW Planning	Tetrad Plc
53	HOW Planning	Arley Homes
66	HOW Planning	Tatton Settled Estates
84	Indigo Planning	Telereal Trillium
106	Steven Abbott Associates	DKH Developments Limited
107	Steven Abbott Associates	James Harts
108	Steven Abbott Associates	Fairport Development s Limited

Retail and Town Centre Uses and Business Based Tourism

9. The main issues raised by respondents to Policy 11 concern the interpretation of PPS4 in respect of out-of-town retail developments, and the role of Preston in the regional retailing hierarchy. Specific mention is made by respondents to the Deepdale Shopping Park, the Capitol Centre, Riversway Retail Park and Queens Retail Park, with arguments made for the policy framework to allow appropriate expansion of the retail uses, in keeping with the sequential approach to development.

Table of Representations on Retail and Town Centre Uses and Business Based Tourism

Representation	Respondent	Respondent Organisation
25	Mr B Ellis	
30		Highways Agency
35		Blackpool Council
37		The National Trust
39	Turley Associates	Sainsburys
45		Lancashire & Blackpool Tourist Board
51	HOW Planning	Taylor Wimpey
60	Pegasus	Northern Trust
78	Alyn Nicholls	Brookhouse Group
79	Osborne Clarke	ASDA
80	Indigo Planning	Royal London Asset Management
83	Indigo Planning	First Investments
85	Indigo Planning	Deepdale Co-ownership Trust
92		Blackburn-with-Darwen Council
93		Lancashire CPRE
108	Steven Abbott Associates	Fairport Developments Limited
111		English Heritage

Areas of Major Open Space

10. Policy 19, part of which concerns Areas of Major Open Space, attracted the largest number of representations in support of the Core Strategy. These were mostly from individual residents living close to the areas concerned. The contrary view submitted is that some of the Areas of Major Open Space should be released for development, whilst still providing neighbourhood separation and recreational opportunities.

Table of Representations on Areas of Major Open Space

Representation	Respondent	Respondent Organisation
1	Cllr. W Shannon	
2	Mr B Ellison	
4	Mr AG Brookes	
7	Mr C Langham	
8	Mr J Hally	
9	Mrs A Miller	
10	Mr B Turner	
33	Drivers Jonas Deloitte	Northern Trust
41		Grimsargh Parish Council
49	Cllr J Buttle	
64		Woodplumpton Parish Council
102		The Ramblers Association
103	Mr R Fletcher	
104	Mr C Homer	
105	Mrs P Homer	
112		TB Planning
117	Mrs J Chessell	
120		Haighton Parish Council

Open Space Audit Study

11. A key respondent (32: Sport England) has commented that the Core Strategy lacks an up to date PPG 17 Open Space Audit study as part of its evidence base. The completion of this study has been unavoidably delayed and will be published soon.

Sustainable Resources and New Developments

12. Several representations were received in connection with the Core Strategy's response to climate change, especially that which is set out in Policy 27 concerning sustainable resources and new developments. Some respondents questioned the evidence for exceeding the national sustainability/carbon reduction targets. These argued for some flexibility in considering viability to be taken account in determining planning applications for new development.

Table of Representations on Sustainable Resources and New Developments

Representation	Respondent	Respondent Organisation
31		Central Lancashire Friends of the Earth
46	DPP	University of Central Lancashire
48		Bovis Homes
57/58/59	Nathaniel Lichfield and Partners	Taylor Wimpey
66	HOW Planning	Tatton Settled Estates
71	DPP	David Wilson Homes NW
72	Sigma Planning	Hallam Land Management
81	GVA	BAE Systems Limited
93		Lancashire CPRE
102		The Ramblers Association

Habitats Regulations Assessment (HRA)

13. A key respondent (21: Natural England) raised concern that the format, process and justification of the conclusions of the HRA Screening Report were unsatisfactory. The HRA Screening Report has subsequently been revised to the satisfaction of Natural England to show: clearer links with Core Strategy policies, the potential pathways related to Natura 2000 sites, and to draw clear and justified conclusions on significant likely effects.

Performance Monitoring Framework

14. The same respondent (21: Natural England) expressed concerns about the small number of indicators and targets for monitoring the Core Strategy. The argument made is that the Councils need to reference a wider range of indicators to comply with the Strategic Environmental Assessment regulations, and to be consistent with the Core Strategy Sustainability Appraisal.

30 March 2011