

The Socio economic statement makes a persuasive case for approval. However it is a only a projection, based on a 2013 model.

In this model:

- The MoJ recognises that the extent of economic impacts are unique to each prison and dependent on their individual location and characteristics
- They state New Prisons would likely be built in "...urban areas..." , with "...good transport links..." to aid staff retention and visitor access.

The application site is on Green Belt land, with poor transport links, not matching the MoJ's own location requirements or characteristics or its own modelling.

If approved the construction phase is projected to create 122 building jobs, but only 12 of these will be local; because this will be a technical construction, needing expertise to be brought in from outside.

When completed 60% of prison services are likely to be purchased by Central Government with little scope for local enterprise.

Existing local service arrangements at Wymott and Garth will be marginally extended to cover additional workload, leading to a relatively small increase in employment for local services.

The projected induced local spend of £8.1 million pounds by prison staff will only be retained locally if employees for example, Do NOT purchase goods on the internet, Do not have holidays outside the local area, Do NOT support their own children through university, or save.

The full extent of the Socio-Economic Impact must be challenged and and its veracity not taken at face value.

Regarding biodiveristy Chorley Council is a co-signatory of the Central Lancashire Biodiversity and Nature Conservation SPD.

Para 46 of this document requires surveys for priority habitats. Yet within the application site a DEFRA designated Priority 1 Lowland Deciduous woodland will be removed. This has failed to be recognised as a priority habitat in the EIA. No specific survey of this feature is available. Your own Tree Officer has recommended replacement planting to...at least match the existing canopy.

Para 55 demonstrates your commitment to ensuring that an absence of observation of a species does not mean it does not exist in the vicinity of the application site. We have observed 29 redlisted species including Red Poll and Corn Bunting. These are excluded from the EIA as out of scope because surveys have not been completed in the appropriate season, contrary to your commitment.

Finally para 83 recognises that established habitat over time accumulates greater biodiversity value over an inferior artificially recreated habitat. You are explicit that compensation for lost habitat will not make an unacceptable development acceptable.

If Chorley Council is to stand by its commitments in the Central Lancashire Biodiversity and Nature Conservation document then there 2 options available to you to night:
Defer or Reject this application

Thank you