



| Report of | Meeting | Date |
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| Joint LDF Officer Team | Central Lancashire LDF Joint Advisory Committee | 15 March 2011 |

PUBLICATION CORE STRATEGY – REPRESENTATIONS RECEIVED AND MAIN ISSUES FOR EXAMINATION

PURPOSE OF REPORT

1. To advise Members of the number and scope of representations made on the Publication Core Strategy, and to draw out the main issues raised.

RECOMMENDATION

2. Members are asked to note the contents of this report, and endorse that the Core Strategy is submitted for examination as the District Councils have previously resolved to do.

EXECUTIVE SUMMARY OF REPORT

3. This report summarises the representations made on the Publication version of the Core Strategy, including the key issues raised. The main challenges to the Core Strategy concern some aspects of the evidence base, and the soundness of some policies, including Policy 4 on housing delivery. The report explains the procedures required to ensure compliance with the regulations, in preparation for the Core Strategy examination later in the year.

REASONS FOR RECOMMENDATION(S)

(If the recommendations are accepted)

4. To ensure that work on the Core Strategy continues to the next stage, the examination.

ALTERNATIVE OPTIONS CONSIDERED AND REJECTED

5. None

BACKGROUND

6. The Core Strategy was published on Wednesday 8th December 2010 and placed on deposit until Monday 31st January 2011. During the deposit period interested parties were invited to make representations on the soundness and legal compliance of the Core

Strategy, and on any matter contained in the document, its related background papers or other evidence. This report summarises the representations made.

SUMMARY OF REPRESENTATIONS

7. A total of 120 representations were received by 31st January (and so were duly made, a few were received late and are not referred to in this report), and between them they raised over 415 separate matters in connection with some aspect of the Core Strategy. The most contentious matters for the examination are likely to relate to those where the representors consider the Core Strategy 'unsound'. This 'fit for purpose' aspect is fundamental to whether the document can be approved and finally adopted. It is the Inspector who will decide on soundness.
8. The precise intention of all representors concerning the matters raised requires more detailed analysis. It is important that we understand fully the intentions of those who have made representations because to be adopted the Strategy must be found sound by the Inspector at the forthcoming public examination.
9. Representations have been received from the following:
 - 4 from local elected Members
 - 3 from private utility companies
 - 5 from local authorities
 - 7 from government departments and agencies
 - 8 from parish councils
 - 9 from non-governmental organisations, national charities, pressure groups and regional organisations
 - 15 from house builders
 - 24 from individuals, of which:
 - 9 support the area of major open space at Ingol
 - 4 oppose the potential western extension of Longridge
 - 3 favour less development in Clayton-le-Woods, and 1 wants more
 - 2 in favour of recreational flying sites
 - 5 others
 - 45 from other land owners or organisations with commercial or development interests
10. Most of the detailed technical representations have been received from house builders, other land owners or organisations with commercial or development interests. Of the 60 representations received from these organisations, only 11 of them consider the Core Strategy to be sound. A full list of the duly made representations is attached at Appendix 1 with brief summaries of the points raised.
11. The main issues arising from the representations concern:
 - Policy 1: various aspects concerning where growth should be located in Central Lancashire, including the settlement hierarchy (65 references received).
 - Policy 4: housing delivery, especially focusing on the proposal to reduce house building requirements (44 references received).
 - Policies 2, 9, 10, and 11: representations on infrastructure, economic growth and employment, employment premises and retailing, many of which make the case for more flexibility and less onerous criteria.
 - The need for up to date and compete evidence for the Strategy, including in relation to Habitats Regulations Assessment, and an audit and assessment of open space, recreation and sports needs.

- Questioning whether the Core Strategy is right to delay or protect sites from development at locations including Ingol (area of major open space), Pickerings Farm, Higher Bartle and Camelot.
 - The role of Preston in respect of the Regional Spatial Strategy.
12. Of these, the most contentious issues are around Policy 4 concerning the amount of house building required in Central Lancashire over the next 15 years. The research approved at the time the District Councils resolved to publish the Core Strategy has found that the economic circumstances have significantly changed since the Regional Spatial Strategy (RSS) was prepared and were taken account of in the proposals of that plan. The research report demonstrates how these circumstances have affected recent housing delivery and how such a situation is likely to endure in the short term. This evidence therefore supports the precautionary approach of applying lower than RSS housing requirement figures at least over the 2010-2012 period.
 13. Members are reminded that the intention is to fully review the housing requirements in the Core Strategy after it is adopted. In the meantime further support for the approach to pursue housing requirements other than those in the (RSS) can be drawn from the latest position with the Cala Homes court action. The High Court has decided that the Secretary of State's intention to revoke regional strategies is a material consideration for planning decision makers. However Cala Homes have appealed to the Court of Appeal.
 14. A small number of the issues raised might be more appropriately considered as part of the site allocations work at the three councils, including matters connected with Safeguarded Land, recreational flying and the cited need for sites for Gypsies, Travellers and Travelling Showpeople.
 15. Your Officers have considered what scope there is to propose changes to the Core Strategy so as to try to meet the concerns of some objectors. Some representations suggest such amendments, others are less precise. It is normal practice to try and agree minor un-contentious changes with objectors so as to reduce the matters in dispute. In the case of minor changes of a factual or clarification nature these can simply be made public and submitted to the Inspector for approval. More major changes that would significantly alter to approach in the Core Strategy would need to be first consulted on and this would delay submission. There are no issues arising from the representations about which Members will be asked to approve such significant changes.
 16. It is therefore not proposed to pursue anything other than minor changes but some of these may relate to major issues – such as a point of clarification although these are unlikely to completely satisfy such objectors. The exact changes will need approval from the District Councils using existing delegated powers to individual Members. The need to put forward further minor changes may arise during the examination stage.

FORMAL SUBMISSION PROCEDURES

17. Regulation 30(d) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 requires the Councils to publish a Statement of Consultation alongside the Core Strategy. This document was produced and placed on deposit at the same time that the Core Strategy was published. It provides details of the consultation carried out during preparation of the Core Strategy, including who was consulted, how they were consulted, a summary of the main issues raised, and how those issues have been addressed. The document will require updating in respect of the deposit period, prior to submission to the Secretary of State.
16. A second document will be prepared in accordance with Regulation 30(1)(e). The purpose of this document is to set out:

- how many representations were made on the Core Strategy in accordance with Regulation 28(2); and
- a summary of the main issues raised in those representations (based on paragraph 11 of this report).

17. Notification and public advertisement will need to be given to the Core Strategy's submission.

NEXT STEPS

18. The examination stage starts immediately after the Core Strategy is submitted (target date end of March) and a Planning Inspector appointed. The Inspector will decide which matters will be the focus of the examination and will ask a series of questions of those parties invited to take part in the public hearing sessions (envisaged in June). These parties will generally be those who have made representations but the Inspector's deliberations will not be limited to matters raised in representations. A programme officer will be appointed to assist the Inspector with the examination arrangements.

There are no background papers to this report.

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