



The countryside charity  
Lancashire, Liverpool City Region  
and Greater Manchester

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Preferred Options Consultation  
Central Lancashire Local Plan Team  
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President  
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Thursday 23<sup>rd</sup> of February 2023

Dear Local Plan Team,

I am writing on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester concerning the Part One Regulation 18 consultation: Preferred Options of the Central Lancashire Local Plan 2023-2038.

**CPRE strongly objects** to the Preferred Options Local Plan due to the high level of harm arising from large areas of farmland being proposed for development without reasonable justification. In Appendix One, CPRE sets out recommendations for an improved focus on brownfield regeneration and countryside conservation. CPRE hopes moving forward that all suitable previously developed land will be identified on the Brownfield Registers. Opportunities to level up the area should not be missed.

#### **About CPRE**

We are CPRE, the countryside charity. We have no vested interests and are not party political. We want a thriving, beautiful countryside for everyone. We believe in countryside and green spaces that are accessible to all, rich in nature and playing a crucial role in responding to the climate emergency.

CPRE is an advocate of up-to-date local plans to enable 'genuine' sustainable development, but in this case the spatial plan for the Boroughs of Chorley, Preston, and South Ribble is unsound due to the harms in the round that would arise outweighing the suggested benefits. This is not in line with the Government's approach as set out in the National Planning Policy Framework, or indeed Central Lancashire own aim of achieving sustainable development.

#### **National Planning Policy framework**

The Government is currently consulting on revisions to the NPPF to overcome problems. CPRE hopes that the Central Lancashire local plan benefits from the proposed changes.

Please contact me if you would like to discuss any of the information in this response.

Yours sincerely

**Jackie Copley MA, BA, (Hons), PgCert, MRTPI**  
Planning Director

## Appendix One: Questions

1. Do you agree with the Spatial Vision for Central Lancashire as set out in Section 2?

CPRE thinks the vision is too focused on growth and recommends that more is said about the rural environment to bring about balance, it suggests the following wording:

*'Central Lancashire has a proud heritage with beautiful and diverse landscapes to be celebrated. By 2038 further investment will make it an even better place. New development will support a healthier population, with a stronger and greener economy, with modern community facilities. The Local Plan will tackle threats posed by the climate emergency and social inequality. This is fundamental to offering our communities improved prosperity and quality of life through sensitive design and provision of sufficient infrastructure. Public transport services, cycling and walking links, digital connectivity and electrified transport systems will enable a zero-carbon impact and ensure sustainable neighbourhoods.'*

2. Do you agree that the proposed Strategic Objectives In Section 2 are what we need to do to deliver our vision and address the challenges we face in Central Lancashire?

No.

3. If you answered 'no' to question 2, can you please tell us what objectives you would change or add?

Although CPRE broadly supports the eleven Strategic Objectives it recommends some reference to Central Lancashire's countryside, as it is an important spatial element, distinct from urban settlements.

4. This Part One Preferred Options Consultation sets out 32 Policy Directions. These policy directions are the first step in developing our proposed policies which will be included in our final draft Central Lancashire Local Plan.

CPRE notes the 32 policy directions.

5. We would like to hear your views on these policy directions. Please tell us your views on these, please state the Policy Direction you have a view about, if you agree and if you would change it, how.

**Policy Direction 1: Sustainable Growth Principles** – CPRE supports as a priority this policy direction to combat the threats posed by the climate and the biodiversity emergencies.

**Policy Direction 2: Spatial Approach** – CPRE objects to the text of the Spatial Approach as it does not support Policy Direction 1. There needs to be a more reasonable approach at focusing

development on cities and towns to revitalise the available brownfield land, of which there is an abundance in the North West, including the Boroughs of Central Lancashire. This regeneration is necessary to achieve genuine levelling up, rather than the unjustified spatial approach focusing on the green fields in rural areas.

CPRE agrees with Preferred Options of the Central Lancashire Local Plan 2023-2038 paragraph 3.7 which states *“The focus for growth beyond the areas identified above is linked to delivering sustainable growth around the existing main urban area of Preston. Concentrating growth in and around urban areas helps to reduce travel demand, makes the best of existing infrastructure, and maximises accessibility to services and facilities. An urban focused and compact development pattern supports a reduction in greenhouse gas emissions (as opposed to a more dispersed pattern) and supports urban regeneration.”* But this approach would not provide the planning justifications for a Garden Village at BAE Samlesbury Employment Zone, Cuerden, or Cottam.

CPRE recommends removing the word ‘broadly’ from first sentence as it dilutes policy and makes the approach appear pusillanimous. In terms of the bullets;

- bullet three text should state: during the plan period, development will be focused in the existing urban areas.
- Fourth bullet should read: Protect the Green Belt. Remove reference to ‘except in South Ribble in the event where there is justification for a garden village or new settlement’. There is no justification.
- Remove reference to the role of Safeguarded Strategic Area of Growth at Samlesbury/Cuerdale Growth Option and in Chorley along the M65 as these are unjustified.
- Relocate the bottom bullet to the top as this is the purpose of the spatial approach.

In view of the large number of enquiries to the CPRE team, the spatial strategy is also very unpopular with local people and communities who wish to see the many brownfield sites and existing allocations of Central Lancashire optimised for development.

Disappointingly, the spatial strategy focuses too heavily on rural development, which is unsustainable.

### ***Safeguarded Land***

CPRE would support the green fields at Pickering Farm being deleted as a safeguarded site or deallocated from the Local Plan.

CPRE strongly objects to the Samlesbury and Cuerdale Growth Option as it constitutes unsustainable development. Release of the land for development would lead to substantial harm, which performs the essential aim of Green Belt between Preston and Blackburn to keep land permanently open. The substantial harm to Green Belt purpose and other harms would not be demonstrably outweighed by the benefits of bringing forward development in the location. Central Lancashire has alternative sites on which jobs and housing could be developed without the same harms arising and supporting regeneration of previously developed sites. Therefore, under the heading Policy Direction 2: Spatial Approach CPRE recommends the deletion of:

- ~~Further consider the role of Safeguarded Land and the Samlesbury/Cuerdale Growth Option~~

CPRE recommends replacement of the deleted text with: Options to regenerate the area's suitable sites identified on the brownfield registers capitalising on the Government's Levelling Up funds.

**Policy Direction 3: Green Belt** – agree.

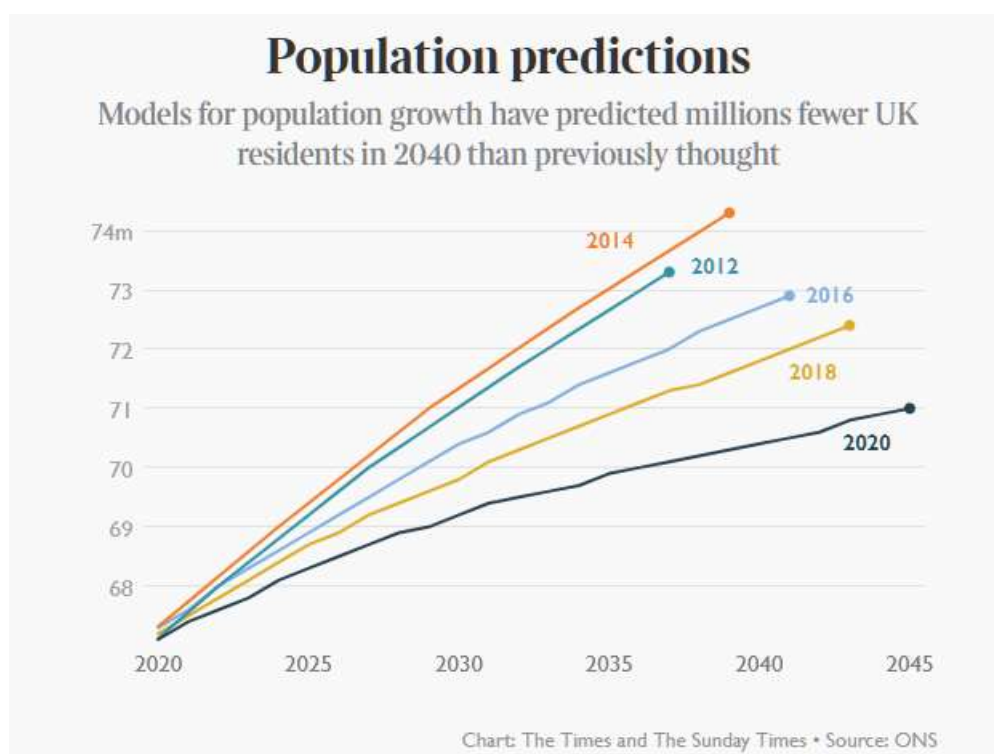
**Policy Direction 4: Development in the Countryside** – CPRE recommends that the policy is rewritten as it reads as preferring development in rural places of Central Lancashire, which is contrary to the spatial approach.

CPRE agrees with point 2 that landscape character sensitivity is an important issue, but currently there are few Neighbourhood Plans with policy to guide landscape character issues. CPRE is actively working with Parish Councils to try and improve this situation.

Areas of Separation need to be more clearly explained as previously the local plan designation was successful at protecting land similar to that of Green Belt designation.

CPRE agrees that policy protection for our high-grade farmland is very important, and it supports bullet 5.

**Policy Direction 5: Longer-Term Large-Scale Development Options** – CPRE **objects strongly** as it is unsound to consider the land requirements at such a far date in the future. Particularly as the Government is due to revise the 'Standard Method', as it leads to the over planning of jobs and housing. The mandated use of out-of-date ONS 2014 data ignores best practice to use up to date data when progressing evidence bases of local plans. 2014 data is predicated on very high growth. The graph below shows how the 2014 data leads to over planning for housing when compared to more recent data. This means more land is being identified as required than is really needed, leading to unnecessary loss of land in the countryside for development.



Source: <https://www.thetimes.co.uk/article/c12dfe60-73d7-11ec-aacf-0736e08b15cd?shareToken=0f343b0b533b3effd742e30293e4d80>

CPRE calls for a reality check out the Census 2021 data for population, which totals 376,700 population. The ONS 2014 projections have simply not born out and there has been an oversupply of land to the market. In the future the scale of requirements will be more limited.

The table below is the Government’s latest Housing Delivery Test which shows over-performance in all areas, except Rossendale.

**Table 1.0 Housing Delivery test, 2021**

ONS Code	Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2021 measurement	Housing Delivery Test: 2021 consequence
		2018-19	2019-20	2020-21		2018-19	2019-20	2020-21			
E07000125	Rossendale	208	180	127	515	123	94	77	294	57%	Presumption
E07000121	Lancaster	400	376	273	1049	302	701	430	1433	137%	None
E07000118	Chorley	418	382	278	1078	573	640	306	1519	141%	None
E07000128	Wyre	317	282	197	796	406	375	620	1401	176%	None
E07000119	Fylde	287	252	181	719	471	634	292	1397	194%	None
E07000122	Pendle	153	134	97	383	314	208	348	870	227%	None
E07000126	South Ribble	209	189	127	525	437	412	424	1273	243%	None
E07000127	West Lancashire	204	181	129	513	323	616	455	1394	272%	None
E06000009	Blackpool	108	104	81	293	368	335	161	864	295%	None
E06000008	Blackburn w D	157	146	103	406	485	303	484	1272	313%	None
E07000120	Hyndburn	60	53	37	151	174	167	191	532	353%	None
E07000124	Ribble Valley	153	136	95	383	403	559	453	1415	369%	None
E07000123	Preston	234	221	166	621	785	747	909	2441	393%	None
E07000117	Burnley	66	58	41	165	251	165	298	714	434%	None

Furthermore, the role of brownfield land, a resource that keeps recycling, in the form of ‘windfall’ sites needs to be properly planned in. The amount of windfall that is likely to come forward is being underplayed.

**Policy Direction 6 Settlement Network and Hierarchy** – CPRE agrees and recommends the settlement hierarchy is set out in the blue box rather than separate Table 1. New development should be clearly focused on Tier 1 and 2, Tier 3 and 4 should only consider development at an appropriate scale and with supporting infrastructure as many of the places identified are deficient in school places, doctors, dentists and other basic community facilities. Ensuring a balanced approach.

**Policy Direction 7: Vibrant Centres** – CPRE supports.

**Policy Direction 8: Climate Change** – CPRE supports. Development of large parts of the countryside will not enable progress to 2030 carbon neutrality. CPRE has been working with Government to ensure carbon emissions are assessed to support decision making.

**Policy Direction 9: High Quality Places** – CPRE supports higher quality places in the future and the Government has policies that are relevant in the NPPF.

**Policy Direction 10: 20-Minute Neighbourhoods** – CPRE supports the planning of sustainable places.

**Policy Direction 11: Scale of Housing Growth** – CPRE agrees enough housing should be planned but, as mentioned in comments for Policy Direction 5, the current development quantum identified is excessive and should be reduced to reflect latest realities. A housing requirement that is difficult to achieve risks land in the Green Belt as vulnerable to speculative development in the inevitable failure of the Housing Delivery Test. CPRE has seen Green Belt development increase by fivefold the amount due to local authorities being saddled by high housing targets.

Remember local authorities only progress allocations and planning applications, they do not build houses. This means they are performance checked on a metric over which they have no control. It is housing developers that build houses. Sometimes the local housing market is such that developers manipulate the market by slowing completions to maintain high house prices, and this can help justify the consent of their other land interests. Failure of the HDT leads to local plan policy being rendered silent, and further weight attributed to housing delivery is added. This removes control of where development goes from the local planning authority and CPRE has witnessed this resulting in the accelerated rate of development of green fields never intended for development. We are highlighting these problems to the Department for Levelling Up, Housing and Communities. It is a real problem, which MPs have become alert to, and it should be addressed. In fact, reducing the housing supply to only four years without buffer is a proposed change to the NPPF that is actively being consulted upon, of course CPRE is supportive to stop needless loss of countryside. Saddling a too high housing growth will undermine the local plan effectiveness and it will expose even the most rural of places to housing development, such as Tier 5 Smaller Villages and Hamlets including: a) Coupe Green b) Much Hoole c) Mellor Brook d) Barton e) Goosnargh f) Lea Town g) Woodplumpton h) Abbey Village i) Bretherton j) Brindle k) Charnock Richard l) Gib Lane m) Higher Wheelton n) Hoghton o) Brinscall/Withnell p) Gregson Lane q) Mawdesley r) Wheelton. This is not a sustainable approach, and it is not popular with our local members.

**Policy Direction 12 Indicative Distribution of Housing Requirements** – Although CPRE agrees with the proportionate split, i.e the higher volume to Preston then South Ribble and then Preston during 2023 – 2037, it disagrees that this split should alter during the period 2033-2038 as Chorley and South Ribble are each identified as delivering a larger share than Preston, which is at odds with the Policy Direction 6 Settlement Network and Hierarchy.

**Policy Direction 13: Gypsy, Traveller and Travelling Showperson Needs** – CPRE agrees there needs to be adequate planning for the needs of this specific group of the population.

**Policy Direction 14: Scale of Economic Growth** – CPRE supports adequate employment needs being planned for but is concerned that the figures shown totalling 225 hectares of employment land are excessive. They should be reduced. The local plan should support the economy but be more realistic. It should be remembered that B8 warehousing is very low job density and the benefits to the local community are low, yet the scale of land take is high, with high harm arising. A balanced economy should protect the rural economy.

**Policy Direction 15: Balanced Housing Market** – Agree. A choice of rental tenures should be considered as First Homes, which are homes at 80% market value can still be out of reach of many households. Rural areas need affordable housing, and housing with specialist facilities for older people to downsize to.

**Policy Direction 16: Protection of Employment Premises, Employment Sites and Existing Employment Areas** – agree, however the policy should focus on brownfield and the strategic road network. Rural areas should only allow employment of suitable scale that is suitable in the receiving environment and landscape.

**Policy Direction 17: Economic Growth Sector Strengths** – there is omission of farming, food, and drink sectors.

**Policy Direction 18: Rural Economy** – broadly accept the need for a rural policy, but as written this will promote development in the countryside.

**Policy Direction 19: Development in Town Centres** – agree.

**Policy Direction 20: Active Travel** – CPRE supports this.

**Policy Direction 21: Food and Beverage Uses and Hot Food Take-aways** – No comment.

**Policy Direction 22 Skills and Economic Inclusion**– CPRE supports this.

**Policy Direction 23: Community Facilities**– CPRE supports this. CPRE notes that Places of Worship are not specifically mentioned. Recently a large speculative development was allowed on a prominent green field site in the open countryside against the local plan and neighbourhood plan policies due to the weight attributed to need. CPRE believes in future the local plan should strategically plan for such uses to satisfy community needs whilst avoiding harm to the countryside.

**Policy Direction 24: Green and Blue Infrastructure** – CPRE supports this policy.

**Policy Direction 25: Biodiversity** – CPRE supports the protection and enhancement of ecology and refers to Circular 06/005 particularly paragraph 84 and relevant NPPF and NPPG including paragraph 010 (Reference ID: 8-010-20190721).

**Policy Direction 26 Trees and Hedgerows**– CPRE supports this and welcomes specific reference to tree and hedgerows, which are important for climate resilience, biodiversity, and landscape character.

**Policy Direction 27: Sustainable Water Management**– CPRE supports this as more flooding is predicted due to climate change.

**Policy Direction 28: Historic Environment**– CPRE supports this as rural heritage is important. Some letters/words missing in line one and a typo in bullet 2.

**Policy Direction 29: Renewable energy generation**– CPRE supports this policy and considers it well written.

**Policy Direction 30 Reducing energy use at the development scale** – CPRE supports this policy and considers it well written.

**Policy Direction 31: Energy reduction new buildings** – CPRE supports this as it is vitally important that we achieve radical reductions in greenhouse gas emissions particularly CO2 emissions in the future.

**Policy Direction 32: Infrastructure Planning Principles** – CPRE supports as it is important for development to have adequate infrastructure, particularly in rural places where it is often absent.

## 6. Do you agree with the Spatial Strategy for Central Lancashire which is Section 3?

No, overall CPRE does not agree with the spatial strategy pages 30 to 49, which is typified, (indeed illustrated with photographs) by public investment in road infrastructure to promote out-

of-town investment schemes in the countryside. There needs to be a more genuine urban led approach to development over the next 15 years.

For example:

Site profile 7 – Local residents (and local environmental volunteers) have applied for a public right of way land at Glencourse Drive, citing regular use for recreation and wellbeing. This was also the site where the City Council applied for Tree Preservation Orders to protect trees and halt unsustainable development. The land connects to a wildlife corridor. CPRE wishes to see an extension of the ecological corridor designation on the local plan.

Site profile 19 – land at Preston East is proposed as an employment site on greenfield land across Guild Wheel. CPRE politely asks that current previously used employment sites in Preston East be reassessed for future use. This is as several sites in existing Preston East employment area are advertised for sale/rental, including those only built in last three years. Similarly, other site profiles propose demolishing other employment sites on Bluebells Way and Riversway/Maritime way, only to propose new development on greenfield agricultural land, which seems in the opposite direction to achieving sustainable development.

## 7. Do you agree that Central Lancashire look further ahead with a 30 year+ vision?

**CPRE strongly objects to a spatial strategy for a 30-year timescale** as it will cause a high level of harm to rural parts of Central Lancashire. The NPPF requires 15 years minimum. The result of planning so far ahead the amount of land identified for development is likely to be more than doubled. When adopted the local plan allocates land for employment, housing, and other uses from day one, which means double the amount of greenfield land, including that protected by Green Belt designation will be released for development. This competes with brownfield land and leads to much needed wasted land resources being left unregenerated. There really is no planning logic to this.

The benefits cannot really be properly assessed as the need is not justified, yet the harms arising can be assessed and concluded to be significant and severe. Central Lancashire is threatened by climate and biodiversity emergencies. It has to plan in a precautionary manner, accepting that as technology advances there is likely to be scope to plan even more sustainably as best available techniques advance. Planning for 30 years + means locking Central Lancashire into a trajectory of certain harm and missing the potential for brownfield regeneration and use of lower carbon approaches in the future.

CPRE has considered the economic evidence:

- Strategic Economic Plan (SEP): A Growth Deal for the Arc of Prosperity
- Lancashire Independent Economic Review 2021
- Central Lancashire Economic Regeneration Strategy 2026
- Central Lancashire Employment Land Study 2022
- Lancashire 2050

CPRE recognises the opportunities of the City Deal and the National Cyber Force Centre. CPRE understands the context of the new strategic context provided by Lancashire 2050, however,



CPRE considers the documents all rely on a growth rate that is too high. The projections have not materialised due to Covid, Brexit, continuing economic uncertainties arising from the illegal invasion of Ukraine and Liz Truss's mini budget. The economic uncertainties are likely to continue into the medium term.

CPRE recommends a local plan period of 15 years. Planning for 30 years based on out-of-date ONS 2014 data is unsound. CPRE considers it paramount that biodiversity and the natural environment are protected and enhanced by the emerging Local Plan and advocates a precautionary approach. A healthy natural environment supports healthy lifestyle and with a healthy population the Central Lancashire is likely to have a more prosperous future, including a more economically prosperous future.

### **National Planning Policy Framework (NPPF) Consultation**

CPRE is responding to the Government's proposed changes to the NPPF, deadline to the consultation is 2<sup>nd</sup> March 2023. CPRE wants a planning system that is truly fair and balanced, providing enough development for employment and housing, but importantly relying on up-to-date data, not out of date ONS 2014 data underpinned by flawed exceedingly high growth. This accepts that in some cases the population is above what it was forecast to be, but this needs to be properly planned for in the future.

Some of the proposed changes are welcome, such as reducing the severity of the Housing Delivery Test by planning a four year amount of housing supply less buffer (it is currently for five years, with 'buffer', equating to a six year requirement, which is clearly too onerous), which more often than not leads to local plan policies being rendered silent, consequently and developers able to more easily acquire consent on greenfield land, never intended for development. But other proposed changes are not welcome, such as removing the requirement of policy being properly justified as it removes accountability and transparency from the system. To date the NPPF has been too developer focused and this has led to an acceleration of development of our countryside, including Green Belt (the loss of Green Belt is at five times faster than before the NPPF was introduced) despite rhetoric and promises to protect Green Belt. Social and environmental factors need more weight in the future, and it ought to be balanced.

More focus on cities and towns to revitalise brownfield land, of which there is an abundance across the North West to achieve real levelling up is necessary, before unnecessarily harming our green fields in rural areas. Future food security, biodiversity and climate resilience must be secured. CPRE wants more policy protection for our beautiful rural landscapes, high grade farmland, biodiversity, and crucially an urgent reduction in carbon emissions in response to the threat posed by the climate emergency.

The Government has indicated improving the approach to calculating employment and housing requirements later this year acknowledging its current approach is wrong.

**Of note there are a number of authorities who have decided to hold off progression of their local plans until the NPPF has been revised in the hope it means less development will be targeted at the countryside and the test for exceptional circumstances will be higher. These are Horsham, Isle of Wight, Mole Valley, North Somerset, South Staffordshire, Stockport, and Teignbridge. CPRE recommends that the Central Lancashire authorities considers delaying progress to benefit from proposed improvements in the next iteration of the NPPF.**

## 8. What alternative development options could be considered beyond the Plan Period?

The Local Plan should set out an urban focused spatial strategy for 15 years. It should direct attention into identifying as many brownfield sites as possible on the local Brownfield Registers, in categories of 'suitable' and 'unsuitable'. The suitable sites can contribute to the first five years of the local plan period and the local plan can enable the 'unlocking' of currently 'unsuitable' sites through identified actions to remove constraints in partnership with Government through promised 'Levelling Up' and with private sector partners.

## 9. Do you agree that a new settlement proposal could form part of the spatial approach beyond the plan period?

No, CPRE strongly objects to the proposed new settlement. It is not needed, and it is not sustainable. The amount of development being planned for is artificially high and the harms arising outweigh the public benefits.

## 10. Would the Cuerdale Garden Village proposal provide a suitable approach to accommodating growth beyond 2038?

No, **CPRE strongly objects to the proposed Cuerdale Garden Village new settlement.** Not only is it not needed, but the location of the Enterprise Zone is also not sustainable. There has not been adequate consultation and engagement with local interests including the local parish councils and farmers (many that are substantial family businesses that are multi-generational) would be most impacted. The harms are not clearly outweighed by the public benefits.

The harms include, but not limited to:

- **Green Belt harm** - Many people who live in Central Lancashire tell us that they value their countryside and local Green Belt. They do not want to see urban sprawl and wish for separate rural villages such as Samlesbury and Cuerdale be distinct from the urban area. There would be countryside encroachment with urbanisation of the east of the M6 Motorway and the views of green hills and distant and near green infrastructure will be replaced by buildings and hard landscaping. The key issue is that Preston, Leyland, and Chorley have brownfield opportunities that currently cause blight and anti-social behaviour. CPRE believes there is a social and environmental imperative to clean up neglected previously developed factory sites for economic growth purposed in advance of bulldozing valuable pastureland and causing harms.
- **Loss of high-grade agricultural land and associated rural businesses and jobs** (some of several generations, with new family members at agricultural college wishing to take over the family businesses). Much of the land is Best and Most Versatile Grade 2, and other high grade agricultural land. There would be indirect harm to the supply and market chains. Many North West authorities have strong food and drink sectors requiring produce from local farms.
- **Loss of biodiversity** including priority habitat and priority species. CPRE echoes the biodiversity harm concerns of the Lancashire Wildlife Trust as the loss of such a large landscape scale area of greenfield land will harm the ecological connectivity, with particular harm of semi-natural woodland and the increase human activity from walking

and dog walking leading to harm to wild flora and fauna, with likely harm to badger favoured grass lands and other foraging opportunities. This is a substantive issue.

- **Loss of rural landscapes and impacts on landscape character and visual amenity.** Many people value the green open landscapes that surround the key urban areas of Preston, Leyland, and Chorley. Those people who live in Central Lancashire tell us that they value their countryside and local Green Belt. They do not want to see urban sprawl. They do not wish for separate rural villages such as Samlesbury and Cuerdale to be merged and lead to coalescence with the urban area. There is countryside encroachment with urbanisation of the east of the M6 Motorway. The views of green hills and distant and near green infrastructure will be replaced by buildings and hard landscaping. The key issue is that Preston, Leyland, and Chorley have brownfield opportunities that currently cause blight and anti-social behaviour. CPRE believes there is a social imperative to clean up neglected previously developed factory sites in advance of bulldozing our pastureland and causing harms. The loss of local character and tranquillity would permanently harm the area of Samlesbury and Cuerdale against heritage and cultural traditions which has an agricultural context.
  - **Loss of rural tourism jobs** and key assets to the visitor economy – many people visit the Central Lancashire rural places for weekends away and holiday. Visitors like to go walking, cycling, bird watching and undertake a variety of rural leisure and recreation activity such as horse riding and fishing. Urbanisation of the area would harm this revenue source.
  - **Loss of Public Rights of Way** - recent development in Samlesbury has already caused the loss of 15 lanes and footpaths, so the cumulative impacts arising from the development would need to be considered.
  - **Ground conditions** - The site is very large and there will need to be careful surveying of the land to test the ground conditions. There is the Greyrigg Samlesbury Gas Pipeline across the development site, which is also a constraint due to the buffer zone associated with it. The proposal has not adequately addressed the site's ground conditions or shown the ground is free from instability or contamination.
  - **Substantial local opposition** – CPRE has been contacted by a great many people, businesses, and the local rural parish councils, including that of Samlesbury and Cuerdale, which undertook a recent referendum to establish there is substantial local opposition to the proposals. This local opposition is a material consideration that needs to be given adequate weight when progressing the Local Plan.
  - **Pollution levels will increase** – the amount of greenhouse gases, air pollution, noise, vibration, and light pollution will increase. Developing land in the countryside implies more carbon per capita than brownfield sites that are in urban locations and accessible by walking and cycling and public transport including bus and rail. The Samlesbury site is not rail connected and the bus services are not reliable or frequent to support sustainable modes of commuting. A development of scale here will generate a lot of additional traffic with all the associated pollution, which is linked to respiratory disease and early death. There are concerns that the local road network cannot cope with the level of traffic that would be generated from the proposed development. This is a most unsustainable site.
- If the need case is accepted as justified, then there are alternative options that are more sustainable.

## 11. Are there other new settlement options that could sustainably deliver future growth?

Yes, identify all of the brownfield sites and build at higher densities to ensure urban places are the engine of growth, where a 20-minute walkable neighbourhood approach may be supported.

CPRE considers that there is more brownfield land for reuse than is recorded on the Brownfield Register.

In December 2022, CPRE published a report that looked at local councils' registers of brownfield land across the country, and it found that over 1.2 million homes could be built on 23,000 sites covering more than 27,000 hectares of previously developed land, nationwide. Just 45% of available housing units have been granted planning permission and 550,000 homes with planning permission are still awaiting development.

What is of relevance, the data also shows clear differences between regions. On the whole, the former industrial heartlands, which are most in need of levelling up, are least likely to have planning permission to redevelop brownfield land. Compared with the national average of 45%, the proportion of available housing units with planning permission is: 33% in the North West, 36% in the West Midlands and 40% in Yorkshire and the Humber. There is still a huge amount of land that can be recycled in our major cities and industrial towns.

The evidence base does under record the amount of previously developed land that could come forward. CPRE considers that there are more sites that may be available for inclusion in the brownfield register, and that there are more underused and vacant premises than are considered for delivering development in the future. Below are issues to consider.

- Allowance for Net Conversions and Changes of Use – due to the recession, changes in retail and other market uncertainties, more buildings are becoming vacant and are available for reuse. The Government has loosened permitted development rights to support the reuse of empty buildings and therefore the allowance for net conversions and change of use should be increased.
- Allowance for windfalls – previously, from a precursory investigation of the Council's Brownfield Register showed some sites that had not been included as 'suitable' sites on the Council's Brownfield Register. The Council should have an accurate and up to date record of suitable brownfield sites. The windfall allowance should be increased.
- Missed opportunities – the Local Plan misses opportunities such as achieving higher density development, securing conversion in empty property in town centres, and misses not only vacant brownfield sites, but those still occupied by under-used likely to come forward during the plan period, which are important for revitalisation of Central Lancashire.

Furthermore, on 22nd of December 2022 the Government published the proposed changes to the NPPF and it is seeking more effective ways at utilising brownfield land under the Levelling Up agenda. CPRE has been urging the Government to improve the way brownfield land is reused. This is what the public wants, a more sustainable approach to the delivery of needed houses and jobs on accessible previously used land to prevent blight of existing communities and protect unbuilt green fields from needless development and all the harms that follow.

## 12. Do you agree with the Spatial Development Priorities for Central Lancashire which is set out in Section 3?

Should this relate to Section 4? If so, answer still no. Please, see answer to Question 6.

The assumptions underlying the employment baseline are too optimistic given continuing economic uncertainties, and a refresh of the requirement is appropriate given the cumulative impacts of Brexit, Covid and Russia's illegal invasion of Ukraine on future economic activity. Since our submission Liz Truss' mini-budget had the negative impact on the economy with the country now in recession.

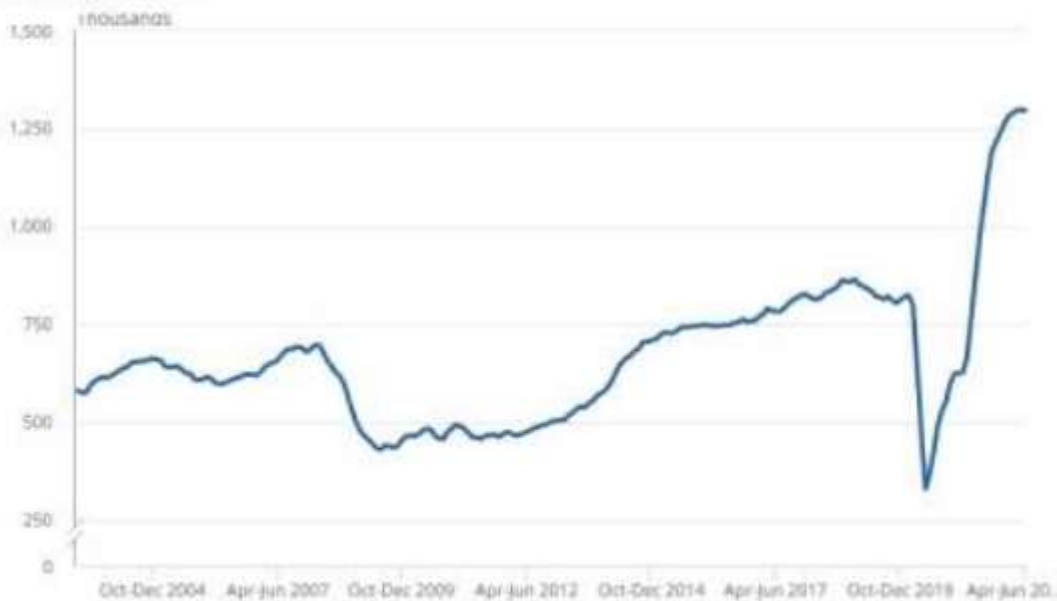
Our concerns are well founded given ongoing global and national economic uncertainties. The World Bank slashed its 2023 growth forecasts of expected global GDP growth from 3% to 1.7% in 2023, on the 10th of January 2023. David Malpass, president said "The deterioration is broad based: in virtually all regions of the world, per capita income growth will be slower than it was during the decade before Covid-19. The setback to global prosperity will likely persist."

In addition, the ONS evidence shows that the UK economy contracted by 0.3% between August and October 2022. While the economy grew by 0.5% in October, economic output in September was affected by the extra bank holiday for the Queen's funeral. As the next quarter is also showing decline, the UK will be in recession. This economic uncertainty is relevant to CPRE's main point that the local plan relies on an improbable amount of economic growth.

CPRE asks the local plan team to consider indicators such as the ratio of vacancies and people who are currently unemployed. At the national level, these recently published economic statistics on vacancies and jobs in the UK: July 2022 from the Office of National Statistics show that the number of job vacancies in April to June 2022 was 1,294,000; an increase of 6,900 from the previous quarter and an increase of 498,400 from before the coronavirus (COVID-19) pandemic in January to March 2022. See trend of vacancies in Figure 1 below. In March to May 2022, the ratio of unemployed people per vacancy remained at 1.0 for the fourth consecutive period, with the number of vacancies slightly higher than the number of unemployed people.

**Figure 1: The estimated number of vacancies was up slightly on the quarter to 1,294,000**

**Number of vacancies in the UK, seasonally adjusted, April to June 2003 to April to June 2022**



Please see comments to Section 4. There ought to be a planned approach that is sustainable. Focusing development on a hierarchy with urban areas the primary focus down to rural areas the least area of focus is a sensible way to plan.

13. We would like to hear your views on the specific site allocations.

Please state the proposed site allocation in your answer

CPRE objects to the unjustified release of Green Belt land. There are sufficient brownfield sites across Central Lancashire to accommodate identified needs.

CPRE considers there to be a flawed approach to the Site Selection Process: Housing and Employment Land. First a justification for release must be apparent, then a review of Green Belt alternatives, only then should Green Belt sites be considered, and this must take the form of a 'strategic review' of all the Green Belt parcels in Chorley, Preston and South Ribble. Each parcel should be considered in terms of Green Belt harm and functions. This has not happened. Also, a full appraisal of the ecological impacts must inform the site selection process to scope out sites that are of high value in line with legislation, national policy, and guidance.

14. If you have any other comments to make about the proposals within the Part One Consultation Document, please state these.

It is imperative that the Part One Local Plan is sound and sustainable in order that the Part Two Preferred options consultation to follow in the summer of 2023 features policies, both strategic and development management (also known as local policies) that will best protect and enhance the countryside of Central Lancashire. Rural areas are a key asset and the value of land staying unbuilt must be fully recognised by the people of Chorley, Preston, and South Ribble. Once land is built, it is built forever, and our environmental quality is reduced forever.