

Consultation Statement Version 2
Woodplumpton
Neighbourhood Plan
2017 – 2026

CONTENTS	Page
1 Introduction	4
2 Summary of Community Engagement	5
3 Regulation 14 Consultation	9
4 Summary of Main Issues raised	10
5 Responses from Regulation 15 and Action With Respect to the Draft Submission Plan	11
Appendix 1 – Neighbourhood Plan Comment Sheet	29
Appendix 2 - Pre-Submission Consultation Statement	30

1. Introduction

Woodplumpton Parish Council has submitted its Neighbourhood Plan to Preston City Council for Independent Examination.

This Consultation Statement complies with the requirements of Regulation 15 of the Neighbourhood Plan Regulations and provides the response to the Regulation 14 Consultation held between 14th September 2020 and 23rd October 2020.

2. Summary of Community Engagement

Woodplumpton Parish Plan engagement

In order to ensure that the Plan was in line with the wishes of the people of Woodplumpton Parish, the Council has based the objectives on the findings of the extensive community engagement that was undertaken to produce the Woodplumpton Parish Plan.

In June 2006 an open community meeting was organised for the residents of Woodplumpton and Catforth Parish. The purpose of this meeting was to explain what a Parish Plan is and to see if there was enough interest and support to develop a plan for the Parish.

The meeting was well attended and a group of local residents volunteered to form a Steering Group. The group was supported from the start by the Parish Council and Community Futures, a local Government organisation that provides guidance and funding for the development of Parish Plans across the country.

The Steering Group first decided that it needed to gather basic information on what the residents of the Parish felt were the main issues they wanted to influence. This was done with a simple survey (Appendix A) which was designed to stimulate a response as well as leaving the opportunity for free expression. This survey was sent to every household on the electoral register and the Steering Group waited for their responses.

From the results of this initial survey 12 key areas / subjects were identified which were then expanded. They were then structured in such a way that they would stimulate both a quantitative and qualitative response from residents. These were compiled into a much more comprehensive questionnaire which was again distributed to all households within the Parish.

Both the survey and questionnaire were posted on the Parish Council web site as well as being freely available from local businesses and public areas / premises.

The 110 responses received were analysed in detail and the results tabulated in a graphical and text form.

From this analysis, significant issues were identified and appropriate short, medium and long-term actions agreed. In addition to these, specific actions associated with the 12 key areas, common themes and major issues were identified and addressed.

The results of this analysis work formed the basis of the Parish Plan.

The above work for the Parish Plan identified issues that are relevant to Neighbourhood Planning including: The environment which is highly valued, development in particular housing and the effect that it can have on the area and footpaths.

Ongoing Engagement via the Parish Council

As well as running the specific engagement exercises listed here, the Parish Council and its members listen to the views and concerns of residents in the area on an ongoing basis. In addition to the work on the Parish Plan the subsequent designation of the North West Preston site has led to considerable concerns among residents and this has been discussed at numerous Parish

Council meetings and this has further input into the original draft Vision and Objectives for the Neighbourhood Plan:

The Draft Vision and Objectives of the Woodplumpton Neighbourhood Plan are as follows:

Our Vision is for a Parish that better meets the needs of existing and new residents while maintaining and enhancing its distinctive character and appearance.

We believe in, and strongly defend the principles that Safety & Security are key elements for the well-being of the Parish as a whole.

We are committed to protecting, maintaining and enhancing our open / green spaces for the benefit of all the community, now and in the future.

We want to maintain and develop a strong and inclusive community spirit and greater cohesion.

Objectives *(derived from the vision)*

- 1 Actively support, promote & develop (where appropriate) local amenities / facilities for the benefit of all residents
- 2 Develop & enhance the individual character of both villages
- 3 Develop & enhance existing (& new where appropriate) open / green spaces
- 4 Promote, maintain & improve policing & security in the Parish including the provision of appropriate resources / facilities
- 5 Actively seek & support improvements to highways, pavements & footpaths to promote the safe & efficient movement through & around the Parish
- 6 Identify & improve appropriate methods of communication & inclusion for the benefit of the community (e.g. broadband access, literature, notice boards, community & social events)
- 7 Identify, promote & support community involvement projects & schemes
- 8 Promote & actively support the need for a diverse range of housing types (e.g. affordable) without losing the character of the Parish
- 9 Promote & actively support existing & new businesses without losing the character of the Parish
- 10 Publicise & promote the use of public rights of way, bridleways & green / open spaces
- 11 Actively maintain & improve public rights of way, bridleways & green / open spaces

Ongoing engagement with Preston City Council

Throughout the plan production process, Woodplumpton Parish Council have maintained a strong and productive relationship with Preston City Council with respect to the Neighbourhood Plan. This has included a number of meetings at different stages of the process and sharing versions of the draft Plan and Character Assessment with the Local Planning Authority.

The City's comments were incorporated into the Plan via track changes on draft versions of the Plan.

Preston City Council were also invited to comment on the Pre-submission consultation draft but declined to do so.

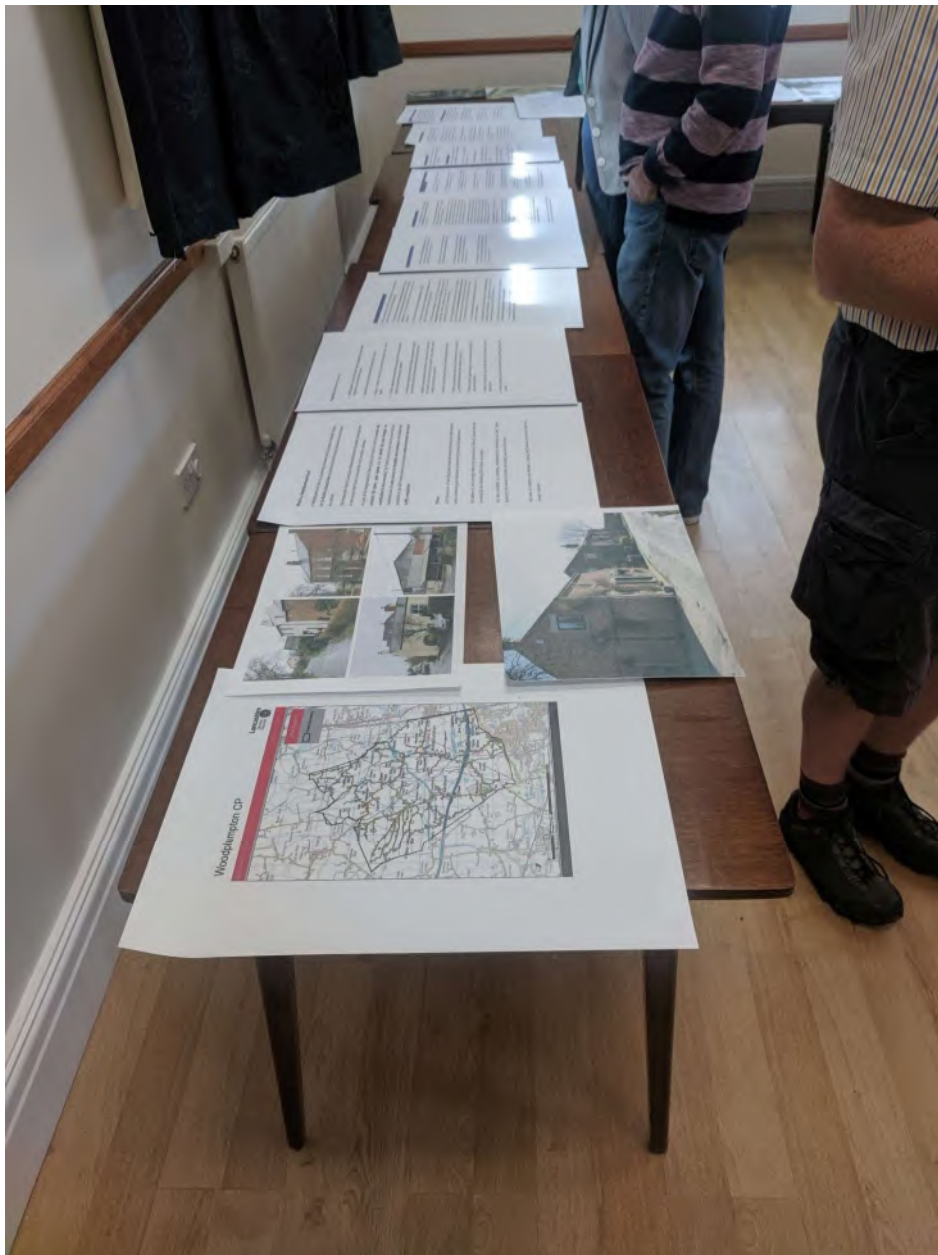
Later engagement - open days

6th July 2019

Based on the draft Vision and Objectives identified from earlier engagement a draft plan was drawn up.

On the 6th July 2019 Woodplumpton Parish Council held public engagement events in Catforth Primary School and Woodplumpton Parish Rooms to seek views on the draft document. The event was advertised on the Parish Council's Website and in the Summer edition of the Parish Council Newsletter, which is delivered to every home in the Parish.

The results of the engagement were very supportive and a copy of the blank comment sheet is attached in Appendix 1



3. Regulation 14 Consultation

A Regulation 14 engagement which ran from 14th September 2020 for a period of 6 weeks – ending on the 23rd October 2020

This involved sending a letter, titled “Pre-submission Consultation Statement” see Appendix 2, to all houses in the Parish notifying them of the Consultation exercise.

It outlined the process of putting the plan together including previous consultation work and how the Plan had been developed in the light of previous comments.

It explained how to respond given the restrictions in place with respect to Covid.

Due to Covid 19, it was not possible to hold a public launch event so residents were encouraged to view the Pre-submission Version on the website www.woodplumptonparish.org.uk and email any comments to the Clerk.

As it was appreciated that not all residents will have access to the internet so arrangements were made so that interested parties could view a hard copy by contacting any of the Parish Councillors or the Parish Clerk.

In addition to residents, the following organisations were notified of the Consultation

Preston City Council
Lancashire County Council

Highways Agency

Canal and River Trust
North West Waterways
Environment Agency
Natural England
CPRE
English Heritage

United Utilities

Homes & Communities Agency
Local Housing Developers – via their site / sales offices

4. Summary of Main Issues

Due to the earlier consultation work there were few significant issues raised at the Regulation 14 stage. Most responses were supportive.

The main issues raised at the Regulation 14 stage were:

1 School places provision and school expansion which was raised by Lancashire County Council's School Planning team who were concerned about some aspects of the supporting Text to Policy COM 1

2 Promotion of Sustainable Urban Drainage Systems which was raised by neighbouring Fylde Council and United Utilities

3 Promotion of Biodiversity which was raised by Environment Agency

4 Concern over the fact that the Plan was not allocating sites which was raised by a councillor from a neighbouring Parish.

The responses are dealt with in more detail below.

5. Responses from Regulation 15 and Action With Respect to the Draft Submission Plan

RESPONSE FROM LANCASHIRE COUNTY COUNCIL SCHOOL PLANNING

The County School Planning team reviewed the whole document, specifically the part referring to education, which is Policy COM 1 (I) and supporting text especially under Justification and Evidence.

LCC's response is to be reviewed in conjunction with the School Place Provision Strategy and Education Contribution Methodology September 2020 which provide further information and context to pupil place provision.

Section 14 of the Education Act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire. The School Planning Team has worked with colleagues at Preston City Council over a number of years as they develop their local plan and masterplan for North West Preston to ensure the infrastructure requirement is included within the policies to support the successful delivery of this strategic area.

NW Preston

The Woodplumpton NP makes reference to Preston City Council Local Plan 2012 – 2026 Policy MD2 and the North West Preston Masterplan Supplementary Planning Document SPD, identifying a secondary school and 2 two form entry primary schools to be delivered. According to LCC, "the long term yield from approximately 5300 new homes in NW Preston, required the inclusion of new schools to be highlighted in the local plan based on the full extent of housing and long term need."

They point out that at the time of their response (November 2020) "new school sites have not been secured, and funding has not been determined to bring forward new schools. LCC is also concerned that residential planning applications have been submitted on the sites allocated to school provision in the NW Preston Masterplan and have sought clarification on this from Preston City Council."

"The delivery of a new school will require careful timing and be delivered to meet the needs from new housing. A fine balance is required to ensure a new school is not delivered too early and places taken up by existing pupils from the surrounding area, this can have a destabilising effect on the areas existing pupil provision and potential financial implications for local schools."

ACTION: This is important background information with respect to schools development so should be included in the justification for Policy COM 1 New and Improved Community Facilities

Primary Planning Areas

The draft NP shows the boundary for the Neighbourhood Plan which includes two schools, St Anne's CE Primary School and Catforth Primary School.

LCC's response explains that "the School Planning Team work within specific Primary Planning Areas across Preston and not by a specific parish. For clarification, the Woodplumpton Parish area falls within the Preston Rural Primary Planning Area and has a total of 4 schools attributed to the area.

The plan also makes reference to other local schools in the area which could serve the parish. Their response adds that the primary schools mentioned nearby in the consultation document are included in the Preston West Primary Planning Area.

Preston Rural
Catforth Primary School
Woodplumpton St Anne's Church of England PS
Barton St Lawrence Church of England Primary School
St Mary and St Andrew's Catholic PS. Barton Newsham

ACTION: This is important evidence for Policy COM 1 New and Improved Community Facilities and should replace the information in Table 1 and the paragraph beginning "There are a number of primary schools nearby which could serve residents within the Parish:" will be replaced by:

"Lancashire County Council's School Planning Team are unable to plan school place delivery at a parish level. School place planning for primary school provision is carried out based on specific areas known as Primary Planning Areas, these are designated areas that are agreed with the Department of Education. Secondary school place planning is carried out at a district level.

The Woodplumpton Parish area falls within the Preston Rural Primary Planning Area and has a total of 4 schools attributed to the area."

and the table below.

Preston Rural
Catforth Primary School
Woodplumpton St Anne's Church of England PS
Barton St Lawrence Church of England Primary School
St Mary and St Andrew's Catholic PS. Barton Newsham

and

"The School Planning Team also take into account identified pupil demand pressures in neighbouring primary planning areas when carrying out school place planning. For example, closure or expansion of a local school or a large housing development in a neighbouring primary planning area would be taken into consideration."

School places forecast

There is growing pressure on places in North West Preston including the Woodplumpton area. Recently the School Planning Team updated the pupil forecasts up to 2026. This information combines the latest birth rates with the housing delivery expected and advised by Preston City Council via the Housing Land Supply document.

Currently the combined schools in the Preston Rural area show there to be a need for 296 additional places in 5 years.

The schools within the Preston West Planning area show there to be approximately 36 surplus places in five years.

While LCC's 5 year projections, evaluated by DfE, are extremely accurate, the lack of future data means that pupil projections beyond 5 years tends to be less reliant. However, using the current data to project future demand suggests a potential shortfall of 459 primary places in 10 years.

The list of schools within the consultation document that refers to housing application assessment (06/2018/0597) is not relevant when considering school place planning, as each planning application assessment only considers pupil numbers at schools within a catchment of their development (2 mile radius for primary and 3 mile radius for secondary) and therefore will be different for each planning application.

For clarification, school place planning relates to planning areas agreed with the Department for Education, whereas assessment of planning applications only consider the position within the specific locality of the proposed development and can therefore be misleading. Furthermore, the information within this planning application consultation is out of date by 3 years.

The table below provides the latest pupil forecasts and sets out the current Number on Roll (NOR). This information and how it is obtained is explained in the updated Planning Obligations in Lancashire Pupil Forecast Methodology by using the link below. We recommend this information is reviewed to understand how LCC obtains the accurate NOR within both primary and secondary schools.

<https://www.lancashire.gov.uk/media/919265/pupil-forecast-methodology.pdf>

Preston Rural	NOR Jan 2020	Net Capacity	Projected Pupils by 2026 (Without housing/migration)	Projected Pupils by 2026 (With housing/migration)
Catforth Primary School	71	70		
Woodplumpton St Anne's Church of England Primary School	104	105		
Barton St Lawrence Church of England Primary School	184	175		
St Mary and St Andrew's Catholic Primary School. Barton Newsham	122	126		
TOTAL	481	476	709	772

	Projected Shortfall	233	296
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Further clarification was forthcoming with regard to how pupils will be apportioned between various schools and the impact of the projections meant that it is likely that new school provision is needed.

ACTION: This is important evidence for Policy COM 1 New and Improved Community Facilities and should replace the information about primary school numbers in Woodplumpton.

Further explanation of the table is to be inserted as follows:

“The projected pupils by 2026 are not broken down by school at this stage as there will actually be an apportionment of the overall projected figures across the schools but it is likely that new school provision is needed.”

School Expansion Policy

With respect to meeting pupils needs, LCC’s response points to their [School Place Provision Strategy](#) which states that their “preferred option is to expand existing school whenever possible, maximising the schools existing capacity options or expanding on the site to meet demand.

The overall aim of this strategy is to ensure that the right number of school places are in the right areas, at the right time to meet demand.”

Outside Play Space with respect to possible expansion of Catforth Primary School

LCC’s response adds that “The strategy is guided by a number of criteria to enable a school to expand to meet housing growth, these again are set out within the [School Place Provision Strategy](#). Government Section 77 of the 1998 Standards and Framework Act is one of the criteria and protects outside space from sale and development.

This ensures a school has the calculated outside space defined by the Department of Education for the capacity of the school. This legislation is used to determine whether a school has sufficient space to expand.

Any expansion of an existing school requires a full suitability and feasibility assessment to ensure the school meets expectation and represents value for money. Expansion is designed to add additional places or forms of entry, funding through developer contributions are secured for expansion, they are not intended to address existing school issues or condition of the building or site. All significant expansion projects would include a statutory consultation process.”

Their response refers to the statement that with respect to Catforth Primary School, LCC will not pay for the school's expansion.

According to Catforth Primary School's Head, Lancashire County Council will not pay for the school's expansion because they say that the school is big enough and that it would mean loss of playing field and playground which would leave insufficient space for the children unless some of the parking space was used to meet the expansion.

With respect to the criteria for expansion: Section 77 legislation relating to the protection of playing fields, LCC provide some clarification relating to their understanding of the situation described at Catforth Primary School as follows:

“In November 2017 the Chair of Governors of the school contacted LCC regarding a possible expansion. LCC responded and advised that the school site is not of a sufficient size under Section 77 playing field legislation to accommodate the expansion proposed by the school.

In January 2018 the Chair of Governors was provided with further site suitability and also advised that at this time there were sufficient places in the local area to accommodate projected demand and no need for the school to expand.

Further exchanges between LCC and the school have taken place up to June and July 2019 when the Head Teacher advised LCC that;

They would be undertaking changes to classrooms and other facilities, the reasoning behind the scheme is that the classrooms that they currently use are undersized and they have mixed classes. Due to the school now filling to the PAN of 10, a combined class of 30 is now "squeezed" into a 43m² classroom. They would like to build a larger classroom to ensure that the PAN of 10 comfortably fits. The HT (Head Teacher) does not want LCC involved in the scheme; she and governors are intending to use a private contractor to build a single classroom extension. They are not seeking any funding from LCC and will be self-funding their scheme.”

It was explained to the head that it was possible for the school to apply to the DfE for Section 77 exemption but this would not be something that LCC would be pursuing as there were projected to be sufficient places in the area to meet demand. An explanation of how section 77 works with the possible inclusion of a Multi-Use Games Area MUGA could increase the school section 77 opportunity. The school was referred to LCC Capital Team responsible for advising of design and suitability. The HT was appreciative of the advice and would keep us up to date and supply updated floor plans when the work was complete.

The statement of LCC refusal to pay for Catforth PS expansion is incorrect. We evidenced there was not the need at that point in time however, we supported the school in their school proposed improvements.

ACTION

The statement: “there is evidence of growing pressure on places within the Woodplumpton Parish boundary and the nearby area (see discussion below)” will be replaced by:

“There is growing pressure on places in in North West Preston including the Woodplumpton area (see Evidence below)”

The statement that LCC refused to pay for Catforth PS expansion will be removed.

RESPONSE FROM FYLDE COUNCIL AND UNITED UTILITIES

- These will be considered together as they both refer to Sustainable Urban Drainage Systems

Fylde Borough Council

Thank you for consulting Fylde Borough Council on the above application. The Woodplumpton Parish Council Neighbourhood Development Plan **provides a comprehensive overview of local issues along with well thought out and appropriately evidenced policies.**

Sustainable Urban Drainage Systems (SuDS) are referenced in Appendix 1 due to their potential for providing recreational benefits, increasing biodiversity value and alleviating flooding. However, there is no mention to the use of SuDS in the policies (or the main body) of the Neighbourhood Plan.

Fylde Council believe that including SuDS as a requirement in appropriate policies would help emphasise their importance, highlight their numerous benefits and promote uptake. We appreciate the opportunity to provide comments and would like to be kept informed of future consultations.

United Utilities Specific Comments

United Utilities recommends additional wording with respect to Surface Water Management:

We recommend the following text is added as a separate point to policy HOU 1 Layout and Design of New Housing:

2. New housing proposals should integrate housing into the surrounding areas. This integration can be achieved in a number of ways and all proposals should show that they have been given serious consideration to the following:

f) . Incorporate SUDS which minimises surface water run-off. These may include features such as ponds, swales and permeable paving designed as part of the development and to reflect the character of the area. Every option should be investigated before discharging surface water into a public sewerage network, in line with the surface water hierarchy.

We suggest the following text is added as part of the evidence and justification for policy HOU 1, point f:

In line with paragraph 80 of the National Planning Practice Guidance on Flood risk and coastal change, surface water should be discharged in the following order of priority:

- 1. An adequate soakaway or some other form of infiltration system.*
- 2. An attenuated discharge to surface water body.*
- 3. An attenuated discharge to public surface water sewer, highway drain or another drainage system.*
- 4. An attenuated discharge to public combined sewer.*

Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available as part of the determination of their application.

United Utilities cannot emphasise highly enough the importance of applying the surface water hierarchy for the discharge of surface water in a rigorous and consistent manner especially in an era when the impacts of climate change are ever more present, and as such we would welcome more encouragement of the use of sustainable drainage systems.

Summary

Moving forward, we respectfully request that Woodplumpton Parish Council continue to consult with United Utilities on all future planning documents. We are keen to continue working in partnership with you and Preston Council to ensure that all new growth can be delivered sustainably.

In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me.

ACTION: The following text will be added to Part 2 of Policy HOU1

“f) . Incorporate SUDS which minimises surface water run-off. These may include features such as ponds, swales and permeable paving designed as part of the development and to reflect the character of the area. Every option should be investigated before discharging surface water into a public sewerage network, in line with the surface water hierarchy.”

Furthermore

the following text will added as part of the evidence and justification for policy HOU 1, point f:

“In line with paragraph 80 of the National Planning Practice Guidance on Flood risk and coastal change, surface water should be discharged in the following order of priority:

1. An adequate soakaway or some other form of infiltration system.
2. An attenuated discharge to surface water body.
3. An attenuated discharge to public surface water sewer, highway drain or another drainage system.
4. An attenuated discharge to public combined sewer.

Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available as part of the determination of their application.”

Environment Agency position

Based on the environmental constraints within the Plan area, we have no detailed comments to make in relation to your Plan at this stage. However together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

Although we have no detailed comment to make, **we would like to raise the following points that you may wish to consider for inclusion as the Plan is progressed.**

Biodiversity Net Gain (BNG)

Paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

The concept of BNG aligns with Policy ENV 3 and could be introduced here to strengthen the policy.

Any new development should have regard to the latest planning practice guidance on how biodiversity net gain can be achieved as part of the proposed development. An accepted methodology has been developed by Natural England, the DEFRA BIO metric 2.0, which can be applied to assess the baseline range and condition of impacted habitats, and demonstrate how development proposals will achieve net gain.

Opportunities for BNG should be identified at an early stage in the design of any proposal, to be incorporated as the design of the scheme develops.

The Policy ENV 3 could also highlight some of the additional benefits of Green Infrastructure:

- It increases surface water infiltration and by slowing and reducing surface water run-off, thus helps to mitigate flood risk and improve water quality.
- It provides shade, and allows species to move and respond to Climate Change (adaptation).

ACTION: The final paragraph of Policy ENV3, which reads:

“The potential impacts on any protected species of any development proposal should be taken into account in developer formulation of proposals and advice sought from Natural England and Preston City Council.”

will be changed to the following:

“2 The potential impacts on any protected species of any development proposal should be taken into account in developer formulation of proposals and opportunities for Biodiversity Net Gain should be identified at an early stage in the design of any proposal and then incorporated as the design of the scheme develops and advice sought from Natural England and Preston City Council.”

The following will be added to the Justification for policy ENV3:

“Biodiversity Net Gain (BNG)

Paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.”

And the following will be added to the Interpretation section of the supporting text to Policy ENV3:

“Any new development should have regard to the latest planning practice guidance on how biodiversity net gain can be achieved as part of the proposed development. An accepted methodology has been developed by Natural England, the DEFRA BIO metric 2.0, which can be applied to assess the baseline range and condition of impacted habitats, and demonstrate how development proposals will achieve net gain.”

Broughton Parish Council

Cllr Pat Hastings questioned why the plan was design focussed and did not include any development sites.

It is the view of Woodplumpton Parish Council that the NW Preston Site allocated in the Preston Local Plan provides a large amount of development within Woodplumpton Parish already with significant impact on the area and for this reason Woodplumpton Parish Council did not wish for the Neighbourhood Plan to allocate further sites.

Preston City Council

During the Reg 14, 6 week Consultation period, no response was received from Preston City Council although they were informed of the consultation as required.

Following the consultation, Woodplumpton Parish Council submitted the draft Plan, Basic Conditions Statement and an earlier version of this Consultation Statement to Preston City Council on 26 July 2021 along with other necessary documentation, receipt of the documents was acknowledged and on 29 September 2021 Preston City Council confirmed that a request had been submitted to NPIERS to appoint an examiner. However, after agreeing a potential examiner with the Parish Council, Preston informed the Parish Council on 10 March 2022 that they had identified potentially fundamental issues such that they felt they could not allow the documents to proceed to Regulation 16 stage. The Parish Council and their consultant then entered into correspondence and had a meeting with Preston City Council to seek to address the concerns. A summary of the main points is outlined below on a policy by policy basis.

COM1

On 16th March 2022, Preston said that with respect to COM1

“Policy COM1 – No mention of Core Strategy Policy 1. No mention of any Local Plan policies. We believe it to be in conflict with CS1 and Local Plan policy EN1”

Woodplumpton’s consultant argued that the policy was in fact in conformity with the Core Strategy Policy 1 as the policy requirement for local need to be evidenced was in line with the requirement in part f of the Core Strategy Policy 1.

Preston’s response was as follows:

“CS1 is all about locating growth within the existing urban areas, key service centres, strategic sites and certain named Local service centres and rural local service centres. Part (f) of the policy simply states a list of the types of development which are acceptable in ‘Other places’ and therefore no other types of development are acceptable.

Part (f) states:

‘development will typically be small scale and limited to appropriate infilling, conversion of buildings and proposals to meet local need, unless there are exceptional reasons for larger scale development schemes’

The accepted interpretation of CS1f is that it is an 'and' not an 'or' position, i.e. a development being small scale isn't sufficient to comply, it needs to be small scale as well as being one of the subsequent types of development"

On 23rd September, Woodplumpton's consultant was not in agreement with this and responded as follows

"There are 2 **ands** in CS1 (f), the first means 'as well as' but the second means 'or'.

As you say:

"a development being small scale isn't sufficient to comply, it needs to be small scale as well as being one of the subsequent types of development"

which is what COM 1 requires of any proposals for new facilities through the policy's criteria.

With respect to "small scale" there is criteria c:

c) The scale and location should be well related to the catchment area of the parish in order to satisfy the needs of the local population

which given Woodplumpton's size and catchment area is going to be small.

With respect to "one of the subsequent development types" there is criteria a:

a) The application is accompanied by evidence of the local need for the facility. In the rural areas this must include a demonstration that other options have been considered such as using existing space or conversion as opposed to new construction."

The response added that unless Preston had further comments in response to the ones above, it was now the Parish Council's intention to resubmit the NP with the changes referred to and to refer to this correspondence in a revised Consultation Statement.

Preston responded:

"Just to revisit CS Policy 1 – for all areas of the parish outside of the village boundary of Woodplumpton our approach to considering all planning applications for development is that they must be small scale infill, conversion of buildings and proposals to meet a local need (unless there are exceptional reasons for larger scale redevelopment schemes (of previously developed sites). As I understand it, COM1 states:

SECTION 3 POLICIES

Policy COM 1 New and Improved Community Facilities

Planning permission can normally be granted for new community facilities which meet the needs of the local community provided that:

- a) The application is accompanied by evidence of the local need for the facility. In the rural areas this must include a demonstration that other options have been considered such as using existing space or conversion as opposed to new construction.
- b) No problems with regard to matters of highway safety are identified
- c) The scale and location should be well related to the catchment area of the parish in order to satisfy the needs of the local population
- d) Where the proposed building is in the rural part of the parish, it should be in keeping with the open rural character of Woodplumpton as described in the Woodplumpton Character Assessment (see pages 14-35 for the overall assessment and 36-51 for the rural character areas). Where the proposed building is in the suburban part of the Parish or in North West Preston it should be in keeping with the suburban fringe character in the Cottam area as described in the Woodplumpton Character Assessment (see pages 14-35 for the overall assessment and 52-57 for the suburban fringe character area).
- e) The development should not cause harm to the character or amenity of adjacent uses and properties
- f) The development should if possible be located where it is accessible by public transport, on foot and by cycle. Car parking should be provided on site in accordance with the appropriate Preston City Council standards
- g) The development will not unacceptably affect either directly or indirectly areas of nature conservation, geological or landscape interest
- i) In the case of school expansion to meet extra demand for places, sufficient playground and playing field space is reserved for the pupils' needs.

I'm afraid I disagree with you that COM1 is in conformity with CS

Policy 1. My reading of the policy is that it requires new community facilities to meet a local need, which ticks that box. However in my view part (c) does not require the facility to be small scale, it requires it to be well related to the catchment area, that requires a level of subjective judgement on two levels, firstly what is the local catchment (I assume it at least includes all land in the parish, which includes a good chunk of NWP [North West Preston] where there are very different levels of development scale to land north of the M55), and secondly how that scale relates well to the local catchment. There is no requirement for development to be infill. At the very least there are tensions between the policies, but in my view they aren't in conformity and COM1 is more permissive than CS Policy 1. If an Examiner is happy with COM1 as drafted and it becomes part of the development plan, in accordance with statute any conflicts or tensions between policies in the development plan are resolved in favour of the most recently adopted policy. In my view this would result in a more permissive approach to development within the open countryside of Woodplumpton parish compared to all other open countryside areas."

The response reiterates the view that COM1 is not in conformity with Core Strategy Policy 1 on the grounds that the latter requires any proposals in the area concerned to meet all 3 of the criteria underlined.

The response adds a further issue of whether COM1's requirement that proposals must be of a scale related to the catchment area of the Parish in order to satisfy the needs of the local population would be in general conformity with the Strategic Policy which requires such proposals to be small scale.

ACTION

The Basic Conditions Statement will be altered to refer to Core Strategy 1.

Policy COM 1 of the Plan will be altered as follows:

c) The well related to the catchment area of the parish in order to satisfy the needs of the local population

will be changed to

c) The proposal will be small scale

The Parish Council believe that otherwise COM 1 is in general conformity with Strategic Policy 1 part f, specifically because the Policy 1 part f requirement that proposals, in addition to being small scale, must be limited to appropriate infilling, conversion of buildings and proposals to meet local need cannot be requiring proposals to meet all 3 of these criteria, for example it is hard to imagine many proposals that are both infill and conversion, so it can only be reasonably interpreted as requiring proposals to be small in scale as well as meeting one of the 3 criteria. By only supporting proposals which are both small in scale and meeting local need COM 1 is in conformity with this Strategic Policy.

COM2

On 16th March Preston's e-mail stated the following about this policy:

"COM2 – schools are more classed as an educational use than a community facility. We would look to LCC as the education authority to offer comments on that. No mention To the Local Plan and conformity with it, in particular Policy WB1."

Woodplumpton's response, through their consultant, was

"As we discussed in the meeting we have had extensive engagement with LCC including e-mails and phone conversations with significant redraft of the supporting text for the policy as a result. This can be seen in the Plan and is referred to in the Consultation Statement.

With respect to Preston's Local Plan policy WB1 to which you refer, notwithstanding the fact that it is not a strategic policy, there does not appear to be any conflict with this policy and COM2. In fact COM2 appears to provide useful extra detail that is in line with this policy by identifying community facilities via the community itself through the NP process including significant formal and informal engagement by the Parish Council."

On 18th May Preston responded by stating

"I think here we were concerned about the inclusion of schools within Community facilities and sought LCC's thoughts. The policy is negatively worded and we're not sure what this policies is offering in addition to LP Policies WB1."

To which, Woodplumpton, on 23rd September, through their consultant replied:

"You still don't say why you are concerned about the inclusion of schools under this policy. National Policy refers to Community Facilities as including Education so I am not sure what the concern is and it is our intention to leave this policy unchanged. You say it doesn't add anything to policy WB1 but I believe it does by listing community facilities which I pointed out earlier.

"In fact COM2 appears to provide useful extra detail that is in line with this policy by identifying community facilities via the community itself through the NP process including significant formal and informal engagement by the Parish Council"
You have now added another issue stating that you think that it is negatively worded but do not state which part of the policy or in what way so I am I left guessing. If you are referring to Part 4

4. Proposals involving the loss of a community facility will be resisted unless each is to be replaced by a new and improved facility in a location approved by the local community or it can be demonstrated that there is no longer any demand for that use.

We could reword this as:

4. Proposals involving the loss of a community facility will only be supported where the facility is to be replaced by a new and improved facility in a location approved by the local community or it can be demonstrated that there is no longer any demand for that use.

The response added that unless Preston had further comments in response to the ones above, it was now the Parish Council's intention to resubmit the NP with the changes referred to and to refer to this correspondence in a revised Consultation Statement."

Further correspondence does not refer specifically to this policy but did include the following statement from Preston with respect to non-strategic policies:

"We have made it clear that it would be a helpful approach to consider compliance with the Local Plan, but we take your point so lets just draw a line under that."

ACTION

No change to the policy or Basic Conditions Statement:

HOU2

On 16th March Preston's e-mail stated the following about this policy:

"HOU2 – question the purpose of this policy? Is it referring to Barn conversions? If not, agricultural buildings can be converted by the GDPO for up to 5 units now"

To which on 13th May, Woodplumpton, through their consultant, replied

"With respect to NP Policy HOU2, in light of your comment I am looking at whether the wording of the policy or supporting text could be improved to reflect the Permitted Development rights you refer to."

After Preston acknowledged the previous response, Woodplumpton, through their consultant, added on 23rd September

"With Respect to HOU 2

After considering carefully policy HOU 2 and the point you made about permitted development rights and consulting with other planning consultants who deal with these issues regularly I think we will more or less leave policy HOU 2 the same but will update the 'interpretation' section to reflect the changes to PD rights that have come into force since we first wrote the policy."

Preston responded

"The second point I wish to make relates to HOU2, which is a very simple point that we have raised with you previously. As drafted HOU2 states:

Policy HOU 2: Conversion of Agricultural Buildings (falling out of use) within Woodplumpton parish to residential use

The principle of conversion of agricultural buildings to residential use within Woodplumpton parish will be supported where:

- a) Suitable services and access are available without the need for works which would adversely affect the character of the building and / or locality;
- b) The building is of a permanent and substantial construction, is structurally sound and capable of conversion and that any important architectural and historical features are retained within the proposal;
- c) The proposal safeguards the roosting or nesting habitat of any protected species present within the building;
- d) Through the use of good design and use of materials, the proposal does not adversely affect the character, rural setting and appearance of the surrounding landscape or the amenity of nearby residents;
- e) The type of use proposed is of a scale and type that is consistent with the specific location (see Design Code: Appendix 1 and Character Assessment);
- f) The proposal does not have an adverse impact on the local highway network, either in terms of highway safety or highway capacity; and
- g) The proposal is accompanied by an acceptable Travel Plan where it is recognised that the proposed use will generate a significant level of trips;
- h) The conversion does not have an adverse affect on the ability of the fields around Woodplumpton parish to continue in agricultural use.

Appreciate your approach to the interpretation, if that is the way you wish to tackle it then so be it. As long as you and the parish are aware that this policy will be completely redundant and unused for any proposals for conversion of agricultural buildings resulting in up to five residential units being created. In accordance with the GPDO no development plan policies are relevant in the determination of such planning applications. I don't know the statistics on prior approval applications we receive but I can imagine almost all are to create less than five residential units. We need to be clear that the Parish Council aren't expecting the Council to refer, never mind use, this policy in the determination of prior approvals creating up to five residential units – I don't want to end up in a scenario where the Parish Council comment on such applications expecting anything to the contrary (unless of course the GPDO is further amended)."

ACTION

The interpretation section of the policy will be updated to reflect both the revised GPDO and the point that Preston make about prior approvals as follows:

Permitted Development rights exist for the change of use of existing agricultural buildings and land within their curtilage for up to 3 dwellings provided the max area is 450m² and the new building is no bigger than the footprint of the original building.

Will be replaced by

Permitted Development rights exist for the change of use of existing agricultural buildings and land within their curtilage for up to 5 dwellings provided the max area is 450m² and the new building is no bigger than the footprint of the original building.

Also

Where proposals come under Permitted Development Rights development plan policies whether in the Preston Local Plan or Woodplumpton Neighbourhood Plan would not apply.

Will be added at the end of the paragraph.

In addition

'The Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2014 (SI 2014/564)

will be replaced by

The Town and Country Planning (General Permitted Development) (England) Order 2015

and the weblink will be replaced by the updated link

<https://www.legislation.gov.uk/ukxi/2015/596/schedule/2/part/3/crossheading/class-q-agricultural-buildings-to-dwellinghouses>

ENV3

On 16th March Preston's e-mail stated the following about this policy:

ENV3 – No mention of Local Plan – this needs to refer to local plan EN10

To which, Woodplumpton through their consultant responded on 13th May:

“With regard to Local Plan policy EN10, again notwithstanding the fact that it is not a strategic policy, ENV 10 would not appear to be in conflict with this policy and in places adds useful local detail. However, I think that it might be useful for the NP to cross reference to the Local Plan policy EN10 somewhere.

I am also wondering whether something more could be said about Biodiversity Net Gain (BNG) as I think that since the policy was drafted there have been some developments in this area. I was wondering whether you were considering looking at changes to BNG policy for example introducing a higher BNG requirement than the statutory minimum.”

To which Preston responded on May 18th:

“A cross reference to EN10 would be helpful

In terms of BNG, as I understand it the Environment Bill has gained Royal Assent but the regulations i.e. the detail on how the BNG requirements are to be delivered haven't appeared yet and probably won't for some time. Our current position is that our policies don't require it, our new Local Plan will (as it will be informed by the regulations) so we aren't yet in a position to implement it. Increasingly developers are looking to provide it anyway, as they know it is on the horizon.”

ACTION

A cross reference to Local Plan non-strategic policy EN10 already exists in the supporting text so no additional reference is needed.

[Local Plan Policies EN2, EN8 and EN10 for Green Infrastructure, Wildlife Corridors and Existing Woodland](#) respective provide further detail of the nature conservation assets of the area.

Appendix 1 WOODPLUMPTON NEIGHBOURHOOD PLAN CONSULTATION 6TH JULY 2019

COMMENTS RECORD SHEET

WHAT DOES THE PLAN DO WELL?

WHAT DOES THE PLAN NOT DO WELL OR WHAT COULD IT DO BETTER?

ANY OTHER COMMENTS?

(CONTINUE OVERLEAF IF NEEDED)

DO YOU LIVE IN THE AREA?

DO YOU WORK IN THE AREA?

DO YOU HAVE A BUSINESS IN THE AREA?

POSTCODE:

IF YOU WISH TO RECEIVE UPDATES IN THE FUTURE PLEASE LEAVE CONTACT DETAILS EG NAME, EMAIL, FULL ADDRESS OR PHONE NUMBER

ALL CONSULTATIONS WILL BE ANONYMISED, NOBODY WILL BE NAMED IN ANY FEEDBACK

Appendix 2 - Pre-Submission Consultation Statement

Woodplumpton Parish Council Neighbourhood Development Plan Pre-Submission Consultation Statement

In June 2017, Woodplumpton Parish Council submitted a Neighbourhood Area application to the City Council to create a Neighbourhood Plan in line with the Parish Council boundaries. The Neighbourhood Area was approved on 8th Sept 2017.

Between Sept 2017 and Sept 2018, the Parish Council undertook a Character Assessment of the Parish and considered our Vision and Objectives for the Neighbourhood Plan. With the help of a Planning Consultant we compiled evidence to support our Vision and wrote draft Planning Policies to help us achieve our Objectives.

On the 6th July 2019 we held a public engagement event in Catforth Primary School and Woodplumpton Parish Rooms to seek views on the draft document. The event was advertised on our Website and in the Summer edition of our Parish Council Newsletter, which is delivered to every home in the Parish.

We considered the replies and tweaked some of the Policies to provide greater clarity and reflect the views expressed and have now completed the attached Pre-submission Consultation Version.

Due to Covid 19, it is not possible to hold a public launch event so residents will be encouraged to view the Pre-submission Version on our website www.woodplumptonparish.org.uk and email any comments to the Clerk. We appreciate that not all residents will have access to the internet and interested parties can arrange to view a hard copy by contacting any of the Parish Councillors or the Parish Clerk.

The 6-week consultation period will run from the **14th September 2020** for a period of 6 weeks – ending on the **23rd October 2020**. Any comments or observations should be sent to

Mrs Julie Buttle
Woodplumpton Parish Clerk
16 Minster Park
Cottam
Preston
PR4 0By

The Parish Council will consider the representations before formally submitting the Draft Neighbourhood Development Plan to the City Council for an independent examination.

In addition to residents, the following organisations have been notified of the Consultation

Preston City Council
Lancashire County Council

Highways Agency

Canal and River Trust
North West Waterways
Environment Agency
Natural England
CPRE
English Heritage

United Utilities

Homes & Communities Agency

Local Housing Developers – via their site / sales offices