

List of Representations Received at Regulation 16 - Woodplumpton NDP



- 1) National Highways
- 2) Environment Agency
- 3) Preston City Council
- 4) Fylde Council
- 5) Canal River Trust
- 6) Lichfields
- 7) Natural England
- 8) Homes England
- 9) Lancashire County Council
- 10) National Gas
- 11) National Grid
- 12) United Utilities
- 13) Representations from Members of the Public x12 (*Inc errors and redacted responses*)

Total Number of Responses Received = 24

Table 1: Schedule of Representations	
Name of Consultee:	Comment Received:
National Highways	<p>Thank you for inviting National Highways to comment on the revised / re-submitted the Draft Woodplumpton Neighbourhood Plan.</p> <p>The only comments on the document that we would make are that:</p> <ul style="list-style-type: none">• The reference to 'Highways Agency' in the list of consultees should be changed to 'National Highways'.• We would suggest that it could be useful, within the Design Code section of the Plan to refer to Department for Transport Policy Circular 01/2022 'The Strategic Road Network and the delivery of sustainable development', which contains the requirements for the assessment of developments affecting the Strategic Road Network (SRN) that National Highways is consulted on; not just in terms of traffic impacts,

	<p>but also physical impacts of development adjoining the SRN. Given that the M55 motorway forms part of the SRN that runs through the Parish, an awareness of the Circular may be worthwhile having for any promoters of development on land adjoining the motorway.</p>
<p>Environment Agency</p>	<p>We are pleased to see our comments on the previous draft version of the Neighbourhood Plan have been considered and the Plan updated accordingly. We have no further comments to make. We are pleased to see our comments on the previous draft version of the Neighbourhood Plan have been considered and the Plan updated accordingly.</p> <p>We would also offer the following comments:</p> <p>Policy ENV3</p> <p>The Plan makes reference to Biodiversity Metric 2.0, in the Interpretation section to Policy ENV3 (page 39). It should be noted that this version of the Metric has been superseded. We would suggest that the Interpretation section is reworded to clarify that the 'latest version' is expected to be used.</p> <p>By November 2023, providing a minimum 10% biodiversity net gain (BNG) in new development will be a legal requirement due to provisions within the Environment Act 2021. Developers should have regard to the latest planning practice guidance on BNG in new development proposals.</p> <p>Developers can establish the pre-development and post-development biodiversity value of their proposals using the DEFRA Biodiversity Metric. Where development proposals do not demonstrate a minimum 10% biodiversity net gain, developers should identify appropriate opportunities and enhancements to achieve it.</p>
<p>Preston City Council</p>	<p>As per the discussions stated within the consultation statement, the council addressed initial concerns with policies COM1, COM 2, HOU2 and ENV3. It is the opinion of the council that our position remains the same in regard to Policy COM1 and that it is within conflict Policy 1 of the Core Strategy and Policy EN1 of the Local Plan. Policy COM1 is more permissive of development for community uses within the open countryside, than CS1 and ENV1. It is arguable that this could be extended to other development with local need, such as affordable housing. The Council also notes that the NW Preston paragraph within the justification section of COM1 is out of context and out of date. The Council also notes that the quotes have been used without a source and are thus not factually based.</p> <p>We note that the suggested changes to the negatively worded policy COM2 (part 4) have not been made and would welcome the proposed changes suggested within the consultation statement.</p>

	<p>The Council welcomes the amendments to Policy HOU2 in regard to PD rights, however, note that the policy does not positively contribute to the Neighbourhood Development Plan and lacks planning weight.</p> <p>In regard to Policy ENV3, the cross reference to Policy EN10 is welcomed. The council would like to draw attention to the interpretation of the ENV3 section and notes that the biodiversity metric has and is changing. Suggested change to interpretation could be <i>'Proposals for development should have regard to the Environment Act which contains a new biodiversity net gain condition for planning permissions. Natural England have developed a Biodiversity Metric which must be used for the purposes of calculating biodiversity net gain for a development. Applicants should use the latest version of this metric at the time of submission.'</i></p>
Fylde Council	<p>Thank you for giving Fylde Council the opportunity to comment on the above document which shares its boundary with Fylde Council's administrative boundary.</p> <p>We have reviewed the changes made to the plan as a result of the comments made by Fylde Council at the Regulation 14 stage and can see that they are reflected in the latest version of the Neighbourhood Plan.</p> <p>One observation, the Neighbourhood Plan does not appear to contain a reference to the Central Lancashire Preferred Options Part 1 plan which has been published and will at a later date become the Local Plan for the Parish of Woodplumpton.</p> <p>Finally, the map of character areas on page 57 does appear to be out of date? Now that the Preston Western Distributor road is nearing completion the area south of the M55 and labelled Woodplumpton has become more suburban in character.</p> <p>So the map could be updated by extending the purple area further west? A link to the Preston Map from the Central Lancashire Plan would provide the context for this change and is in any case very useful preston-a0-overview.pdf (lancashire.gov.uk)</p>

<p>Canal River Trust</p>	<p>The Trust have reviewed the Woodplumpton Neighbourhood Plan and we have is the following general advice:</p> <p>The Trust owned Lancaster Canal passes through the heart of the plan area. The existing marinas within the plan area are owned and operated by third parties. Given the settlement area it is very unlikely that there will be any significant canal side development within the plan area.</p> <p>Policy MOV1 relates to improvement to provision of footpaths, cycle paths and bridleways. This should be expanded to include towpaths. The supporting text to the policy notes that improvements would make it easier for people to move sustainably and that <i>"in particular, the canal tow path is a key link in this network but is frequently waterlogged making it unusable for many people."</i></p> <p>The design of canal towpaths is to be agreed and in accordance with towpath design guide. The Trust are currently working on an updated towpath design guide and we would welcome reference to such a design guide within the Plan as this would help to ensure that such towpath would be appropriate to the character of the area. Any works on our towpaths would require the consent of the Canal & River Trust. As a charity would welcome any funding to secure improvements to the towpath and access to it.</p> <p>Policy MOW 2 relates to promoting walking and cycling in new development and encouraging these to link in within existing routes including the canal towpath. We would support the general thrust of this policy in terms of promoting the use of the canal towpath. However as set out under policy MOV1 the canal towpath would need to be upgraded to support increased uplift in usage and to make it useable all year round.</p> <p>Appendix 1 Design Code under section 2.2 relates to movement. We consider that reference should be made to LTN 1/20 Guidance on Cycle Infrastructure design, which provides useful up-to-date guidance. As noted above the Trust are currently working on producing an updated towpath design guide and it will be published shortly. We would welcome reference to this towpath design guide within the Plan as this would help to ensure that such towpath works would be appropriate to the character of the area. This is especially the case that the Hampshire Countryside Design Standards may not be appropriate for this rural stretch of towpath. Any works on our towpaths would require the consent of the Canal & River Trust.</p>
<p>Lichfields <i>On Behalf of Bloor Homes and Taylor Wimpey</i></p>	<p>On behalf of Bloor Homes and Taylor Wimpey UK Limited [Taylor Wimpey] we are pleased to set out below representations to the Regulation 16 consultation on the Woodplumpton Neighbourhood Plan – Revised Submission Version [WNP].</p> <p>1.2 These representations are made in context of Bloor Homes and Taylor Wimpey’s land interest, namely land east of Sandy Lane and west of Tabley Lane [the site], which is located within the designated Neighbourhood Plan Area. The site is situated approximately 500m south of the village of Woodplumpton, beyond the M55 Preston Northern Bypass. A plan showing the location of the site is attached at Appendix 1.</p>

1.3 The site forms part of the North West Preston Strategic Location [NWPSL], which is identified in the Central Lancashire Core Strategy [CLCS] as a focus for growth and investment (Policy 1). The Preston Local Plan 2012-26 (Site Allocations and Development Management Policies [PLP] expands on CLCS Policy 1 and allocates land for “a residential mixed-use development comprising the erection of approximately 5,300 dwellings and associated local centres together with the infrastructure to facilitate the creation of a sustainable community” (Policy MD2).

1.4 The NWPSL extends to approximately 390ha and is situated approximately 4km northwest of Preston City Centre, directly to the south of the M55. It stretches from the Sidgreaves Lane / Lea Lane to the west to the M6 motorway to the east. Within the NWPSL, the majority of the land to the south of the neighbourhood area, beyond the M55, is located within the WNP.

1.5 The North West Preston Masterplan Supplementary Planning Document [NWPM SPD] was adopted in March 2017 and sets out how the criteria of Policy MD2 should be implemented. It provides the key design guidelines for the area, this includes (amongst other things) sustainability; movement and legibility; and density and mix of uses.

1.6 Overall, Bloor Homes and Taylor Wimpey welcome the efforts made by Woodplumpton Parish Council in preparing a Neighbourhood Plan. Whilst Bloor and Taylor Wimpey generally support the Neighbourhood Plan and recognise the modifications have been made Pg 2/8 26380785v2 in response to previous consultations, there is a concern that the WNP does not give due regard to PLP Policy MD2 and the NWPM SPD. Indeed, it is questionable whether the WNP should apply to the land that lies within the NWPSL at all.

1.7 Paragraph 29 of the National Planning Policy Framework [NPPF] sets out that: “Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”.

1.8 The Planning Practice Guidance¹ [Practice Guidance] states that only a draft Neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are: 1 having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). 2 having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders. 3 having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders. 4 the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development. 5 the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). 6 the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations. 7 prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

1.9 We have therefore considered the WNP against these requirements. Specifically, the submission provides representations in relation to the policies and parts of the Plan listed below: 1 Introduction

2 Policy COM1 – New and Improved Community Facilities 1 Reference ID: 41-065-20140306 Pg 3/8 26380785v2 3 Policy HOU1 – Layout and Design of New Housing 4 Design Code 2.0 Introduction

2.1 Page 6 of the WNP (under the heading Woodplumpton Parish and Planning Context) sets out that: “Special mention needs to be made of the North West Preston Masterplan Supplementary Planning Document and the supporting Preston Local Plan Policy MD2 which identifies land in North West Preston for residential led mixed use development of around 5,300 homes and associated local centres and infrastructure. These include a health centre an east west link from Preston Western Distributor Road to Lightfoot Lane, a secondary school, 2 primary schools and green infrastructure including play provision. The scale of the proposed development will have a very significant impact on the site, its setting and thereby the character of the Parish. As the area is developed the character of this part of the Parish will be significantly affected, effectively extending the Cottam suburban area further into Woodplumpton Parish.”

2.2 From the above text, it seems that the “area” being referred to is the NWPSL. However, the text then goes on to state that “preserving and enhancing the character of the area is an important part of this Plan.” This is clearly not possible given that the NWPSL is allocated as a residential-led mixed use development comprising of around 5,300 homes. It is also at odds with the foreword, which states that “Work is progressing on NW Preston as a strategic location and whilst that area has its own Masterplan, a Neighbourhood Plan will ensure that other areas of the Parish are not neglected and the needs / improvements for the whole Parish are assessed and provided for.” (Lichfields emphasis). This implies that the WNP is not intended to relate to the NWPSL.

2.3 It is important that this conflict is addressed to provide clarity for those bringing forward sites in the NWPSL, as development in this part of the designated Neighbourhood Plan Area is already subject to the requirements of PLP Policy MD2 and the NWPM SPD. Basic Conditions Test 2.4 It is considered that the WNP does not meet the Basic Conditions because: 1 It does not conform with the strategic policies contained in the development plan for the area of the authority: The WNP sets out detailed policy guidance for the designated Neighbourhood Plan Area, which includes land allocated for development under PLP Policy MD2. The written justification for PLP Policy MD2 is clear that a Masterplan will be prepared for this area which will provide a comprehensive framework for its future development. It is therefore considered that there is a lack of alignment of approach between the strategic policies contained within the development plan and the WNP. Pg 4/8 26380785v2 Recommended Change 2 The relevant strategic policy contained within the development plan (PLP Policy MD2) states that a detailed Masterplan for the NWPSL will be prepared. This document was adopted in March 2017. The WNP should therefore clarify that its policies do not apply to the NWPSL, or as a minimum demonstrate how they are consistent with the guidance set out in the NWPM SPD.

3.0 Policy COM1 – New and Improved Community Facilities 3.1 Policy COM1 focuses on new and improved community facilities. It states that planning permission can normally be granted for new community facilities which meet the needs of the local community.

3.2 Bloor Homes and Taylor Wimpey generally support the principle of providing new and improved community facilities. In this context, it is noted that proposals for the site at Tabley Lane includes land safeguarded for a secondary school and a local centre. Preston City Council has resolved to grant outline planning permission for the development (LPA ref. 06/2020/1421) subject to the signing of a Section 106 agreement. 3.3 The justification for Policy COM1 sets out Lancashire County Council's [LCC] approach to school place planning. It includes a section titled 'NW Preston', which sets out LCC's response to the Regulation 14 Consultation on the WNP: "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."

3.4 This statement is not only out of date, but it is unclear what relevance it has to Policy COM1. LCC is the Strategic Commissioner of Education Provision, and the school place provision strategy is delivered by its School Planning Team. It is therefore unnecessary for the WNP to replicate data that has been prepared by LCC and relates to only a snapshot in time. Furthermore, as set out above, land has been reserved for the provision of a secondary school on the site at Tabley Lane in accordance with the NWPM SPD. The above statement is therefore factually incorrect.

3.5 Part (f) of Policy COM1 sets out that "In the case of school expansion to meet extra demand for places, sufficient playground and playing field space is reserved for the pupils' needs." This does not provide any additional policy guidance over and above that contained within the adopted PLP or NWPM SPD and it is therefore not necessary to repeat it in Neighbourhood Plan policy. Basic Conditions Test 3.6 It is considered that Policy COM1 does not meet the Basic Conditions because: 1 It does not have regard to national policies and advice: The justification for the policy is not based on up to date evidence. Pg 5/8 26380785v2 Recommended Change 2 To ensure Policy COM1 is sound, the policy should be informed by up to date evidence. Reference to the outdated LCC response should be deleted. Without this, the supporting justification is factually incorrect and it does not contribute positively to the overall objectives of the Neighbourhood Plan.

4.0 Policy HOU1 – Layout and Design of New Housing

4.1 Policy HOU1 sets out that any new housing development should achieve a high standard of design and layout compatible with the mixed rural and suburban nature of Woodplumpton Parish according to location. The policy goes on to state that new housing proposals should integrate housing into the surrounding areas. This will be achieved through giving "serious consideration" to six design principles.

4.2 Bloor Homes and Taylor Wimpey supports the focus on high quality design however, there is concern that the policy is overly prescriptive and has no regard to PLP Policy MD2 and the detailed guidance set out within the NWPM SPD.

4.3 Again, the key issue (as raised in Section 2.0) is that there is a clear lack of alignment of approach between strategic policies contained within the development plan and the WNP. The foreword to the WNP explicitly states that "NW Preston will provide a variety of homes designed for

families and urban living and a Neighbourhood Plan will give the Parish Council the opportunity to influence the shape and growth of development outside of the strategic location whilst retaining the rural character of the Parish.” (Lichfields emphasis).

4.4 Policy HOU1 conflicts with this text. It states that “some of the above points (b,c d and e) may only be practical on larger development sites and these are likely to be located in the allocated sites in North West Preston or larger windfall sites.” The policy is therefore clearly intended to relate to the NWPSL.

4.5 There is also a conflict between some of the criteria. For example, criteria (a) states that “In the rural areas, smaller 2-3 bed semidetached houses or small terrace are more likely to protect and enhance the rural character than larger detached dwellings although in some cases such as due to plot-size restrictions a small detached may be acceptable” whereas part (d) seeks to “provide a good mix of housing types.”

4.6 It is also considered that there is no justification for the requirement for developers to provide copies of existing and proposed drainage strategies to the Parish Council. Assuming this refers to detail submitted as part of any planning application, this information should already be publicly available. Basic Conditions Test

4.7 It is considered that Policy HOU1 does not meet the Basic Conditions because: 1 It does not contribute to the achievement of sustainable development: The policy is over prescriptive in respect of land within the NWPSL and does not therefore contribute positively to the overall objectives of the Neighbourhood Plan. Pg 6/8 26380785v2 2 It does not conform with the strategic policies contained in the development plan for the area of the authority: The policy does not refer to the NWPM SPD and does not give due regard to the development plan policies relating to the part of the designated Neighbourhood Plan Area that is located beyond the M55 (i.e. the NWPSL). Recommended Change

4.8 In order for Policy HOU1 to be considered sound, it should be made clear that it does not relate to the NWPSL, or as a minimum set out how it is consistent with PLP Policy MD2 and the NWPM SPD. This is essential to ensuring that there is general conformity with the strategic policies contained in the development plan.

4.9 The wording of parts (a) and (d) should also be reconsidered to ensure that they are consistent.

5.0 Design Code

5.1 Appendix 1 of the WNP includes a Design Code for the designated Neighbourhood Plan Area. Bloor Homes and Taylor Wimpey are generally supportive of the principle of Design Codes. However, there is a concern that Appendix 1 which contains a ‘General coding for whole of Woodplumpton Neighbourhood Plan Area’.

5.2 As set out previously, the designated Neighbourhood Plan Area includes the NWPSL. Bloor Homes and Taylor Wimpey would therefore again raise the question of how the WNP conforms with the strategic policies set out in the development plan (namely PLP Policy MD2) and the NWPM SPD. Furthermore, the application of the Design Code to the whole of the Woodplumpton Neighbourhood Plan Area again highlights the conflict between the foreword and introduction to the WNP, both of which indicate that the document is concerned with development outside of the NWPSL.

	<p>5.3 It is noted that a Character Assessment has been undertaken to support the Design Code. This separates the Woodplumpton Neighbourhood Area into four key character areas. The site at Tabley Lane falls largely within the identified Suburban Fringe however, a small area also falls within the Woodplumpton Area. The majority of suburban fringe is located within the NWPSL. The inclusion of this area within the Design Code therefore contradicts the NWPM SPD, which already sets out a number of overarching design principles to be considered when bringing forward development.</p> <p>5.4 The Design Code also states that “there are no clear edges as the suburban fringe is currently shifting with the growth in North West Preston”. However, PLP Policy MD2 and the NWPM SPD clearly identifies the boundaries to the NWPSL, as well as providing a Main Masterplan Indicative Framework (Map 05). This should be acknowledged with the WNP. Basic Conditions Test</p> <p>5.5 It is considered that the Design Code does not meet the Basic Conditions because: Pg 7/8 26380785v2 1 It does not conform with the strategic policies contained in the development plan for the area of the authority: The inclusion of the Suburban Fringe within the Design Code has little regard to the NWPM SPD or the development plan policies which relate to the NWPSL. This has the potential to impact future development coming forward. Recommended Change 2 To ensure the plan can be considered sound the Design Code should be clear that it does not relate to the parts of the designated Neighbourhood Plan Area that are already covered by the NWPM SPD, or as a minimum, it should set out how the Design Code is consistent with the NWPM SPD. Without this change, there is potential for the Design Code to hinder development within areas already covered by the NWPM SPD.</p> <p>6.0 Conclusion</p> <p>6.1 Bloor Homes and Taylor Wimpey generally supports the WNP and recognise the modifications made in response to previous consultations. However, there are concerns that there are some parts of the WNP that are not in general conformity with the strategic policies contained within the development plan. These concerns are largely related to the inconsistencies around whether the WNP is intended to apply to the NWPSL, and if this is the case, there needs to be clarity as to how the policies are in compliance with PLP Policy MD2 and the NWPM SPD.</p> <p>6.2 It is considered if the suggested amendments to the WNP are made, the Neighbourhood Plan will meet the basic conditions as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. However, without these amendments it is considered that the plan will not meet these basic tests and cannot be put to a referendum and be made. 6.3 We trust that the above representations will be passed on to the independent examiner for consideration.</p>
Natural England	<p>Thank you for your consultation on the above dated 08 February 2023.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>

	<p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on the Woodplumpton Neighbourhood Plan</p>
Homes England	<p>As a prescribed body, we would firstly like to thank you for the opportunity to comment on the above consultation.</p> <p>Homes England is the government's housing accelerator. We have the appetite, influence, expertise, and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.</p> <p>Homes England does not wish to make any representations on the above consultation.</p> <p>We will however continue to engage with you as appropriate.</p>
Lancashire County Council	<p>Thank you for consulting Lancashire County Council on the above planning document and I provide the following comments on behalf of the County Council. Lead Local Flood Authority (LLFA) Under the Flood and Water Management Act 2010, the LLFA is the responsible 'risk management authority' for managing 'local' flood risk which refers to flood risk from surface water, groundwater or from ordinary watercourses. Comments provided in this response are advisory and it is the decision of the Local Planning Authority whether any such recommendations are acted upon. These comments have been composed based on the current extent of the knowledge of the LLFA and information provided with the consultation at the time of this response. Lead Local Flood Authority Position The LLFA has reviewed the Woodplumpton Neighbourhood Development Plan 2017 – 2026 Submission Draft, and has the following comments to make: • The LLFA welcomes and supports the reference to Sustainable Drainage Systems (SuDS) within Policy HOU1: Layout and Design of New Housing. However, for consistency, we would encourage closer alignment with the wording used in the National Planning Policy Framework, Planning Practice Guidance and Policy Direction 27: Sustainable Water Management of the emerging Central Lancashire Local Plan. 2 • The LLFA encourages a clear linkage to be made between SuDS and water reuse, for example through the use SuDS components at source, for example through blue and green roofs, water butts and rainwater harvesting. The LLFA also encourages a clear linkage to be made between the water environment, measurable biodiversity and environmental net gain, the protection and enhancement of blue-green infrastructure and the provision of multifunctional SuDS. • Paragraph 4 on page 19 makes reference to the hierarchy of drainage options set out in paragraph 080 of the National Planning Practice Guidance. This is an old reference which has since been updated in August 2022. The correct reference is paragraph 056 of the flood risk and coastal change section of the Planning Practice Guidance. What this response DOES NOT cover This response does not cover highway drainage, matters pertaining to</p>

	<p>highway adoption (s38 Highways Act 1980) and/or off-site highway works (s278 Highways Act 1980). Any policies pertaining to highway matters would need to separately discuss with the relevant highway authority. Material Changes or Additional Information to this Policy If there are any material changes to the submitted information or additional information provided after this Lead Local Flood Authority response which impact surface water, then it is advised that the Lead Local Flood Authority is re-consulted. Schools Planning Team The County Council's School Planning Team wish to thank Woodplumpton Parish Council for the opportunity to engage in the consultation process for the Woodplumpton Neighbourhood Development Plan 2017-2026. At this stage the team does not have anything further to add to the submission of November 2020 (as attached to the cover email) other than to advise that we are currently engaging with Preston City Council regarding the development of the Central Lancashire Local Plan. I hope that you find these comments valuable and should you wish for further information or clarification on the contents of this letter please contact me at the email address provided. Once again I would like to thank you for the opportunity to respond to this latest consultation and for the continued cooperation received.</p>
National Gas	<p>National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Gas Transmission National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. Proposed sites crossed or in close proximity to National Gas Transmission assets: An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.</p> <p>National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p>
National Grid	<p>NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p>
United Utilities	<p>Thank you for your consultation seeking the views of United Utilities Water Limited (UJW) as part of the Neighbourhood Plan. UJW wishes to build a strong partnership with neighbourhood groups to aid sustainable development and growth. Allocations for New Development Following our review of the Neighbourhood Development Plan (NDP), we note that there are no new allocations for future development which are additional to the allocations in the adopted Local Plan. If this were to change, we would request early dialogue so that we can engage in any site selection process and ensure any issues are highlighted early. Our Assets It is important to outline the need for our assets to be fully considered in any proposals in the NDP Area. UJW will not allow building over or in close proximity to a water main. UJW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances. Site promoters / applicants should not assume that our assets can be diverted. On occasion, an asset protection matter within a site can preclude</p>

delivery of a proposed development. It is critical that site promoters / applicants engage with U UW on the detail of their design and the proposed construction works. Planning Policy Your ref: Preston City Council Town Hall Our ref: Lancaster Road Date: 22-MAR-23 Preston PR1 2RL United Utilities Water Limited Registered in England & Wales No. 2366678 Registered Office: Haweswater House, Lingley Mere Business Park, Lingley Green Avenue, Great Sankey, Warrington, WA5 3LP All U UW assets will need to be afforded due regard in the masterplanning process for a site. This should include careful consideration of landscaping and biodiversity proposals in the vicinity of our assets and any changes in levels and proposed crossing points (access points and services). We strongly recommend that the LPA advises future applicants / promoters of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. We ask site promoters to contact U UW to understand any implications using the below details: Developer Services – Wastewater Tel: 03456 723 723 Email: WastewaterDeveloperServices@uuplc.co.uk Developer Services – Water Tel: 0345 072 6067 Email: DeveloperServicesWater@uuplc.co.uk Climate Change U UW recommends that the NDP includes references to the climate emergency and carbon neutrality.

In particular, U UW would like to encourage the Parish Council and LPA to consider further specific policy relating to sustainable surface water management and water efficiency. Sustainable Drainage - Foul Water and Surface Water U UW welcomes the wording included within the NDP regarding sustainable drainage. Within Policy HOU 1 Layout and Design of New Housing, we are supportive of criterion f which states: '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.' Notwithstanding our support for the principle of this criterion, we request that consideration is given to a more detailed policy relating to the sustainable management of foul and surface water in the NDP. This could be included as an expansion of criterion f or a new policy relating to drainage. Our recommended wording is below. 'Applications must be supported by a foul and surface water management strategy. Surface water proposals must follow the surface water hierarchy. Surface water will only be allowed to discharge to the public sewer as a last resort. Proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted Drainage must be considered early in the design process and linked to any strategy for landscaping and biodiversity. Major development will be required to incorporate sustainable drainage which is multifunctional in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible. For any development proposal which is part of a wider development, foul and surface water strategies must be part of a holistic site-wide strategy. Applications must be accompanied by a drainage management and maintenance plan including a plan for any watercourse management that is within / adjoining the site.' We recommend that you refer to the Susdrain website which includes a range of case studies that show examples of how SuDS have been implemented in various different circumstances. It is worth noting that the Environment Act 2021 places an obligation on sewerage undertakers in England to secure a progressive

reduction in the adverse impacts of discharges from storm overflows to reduce the impacts on the environment and public health. Consistent with meeting this obligation, UUW engages extensively in the planning process to seek to reduce the discharge of surface water to the public combined sewer by ensuring that the hierarchy for managing surface water is thoroughly investigated prior to allowing any connection of surface water to the public combined sewer. This is important as surface water flows are much larger than foul flows. By doing all we can to reduce the connection of surface water to the public sewer, we are able to minimise the likelihood of sewers impacting on our regions watercourses and flooding our customers. In this context, it is critical that any NDP policy is appropriately worded to ensure that clean surface water discharges to more sustainable alternatives than the public sewer wherever possible. Water Efficiency Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day (l/p/day) for new residential development which can be implemented through local planning policy where there is a clear need based on evidence. In this regard, we have enclosed evidence prepared by Water Resources West to support the adoption of the Building Regulations optional requirement for local authorities in North West England and the Midlands. We therefore recommend the inclusion of the following wording as an additional criterion to Policy HOU1 – Design Principles. We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reductions noting that water and energy efficiency are linked. We also wish to note the associated societal benefits by helping to reduce customer bills. ‘All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.’ We also recommend that consideration is given to the following additional policy wording relating to water efficiency in non-residential development. ‘All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM ‘Excellent’ standard. Where the ‘Excellent’ Standard cannot be achieved, evidence must be submitted with an application to the satisfaction of the local planning authority. The BREEAM ‘Very Good’ standard must be met as a minimum.’

Landscaping
As noted above, UUW welcomes the wording included within the NDP regarding sustainable drainage. However, UUW requests that the NDP includes a policy which strengthens the role that landscaping can play in the management of surface water. The evaluation of surface water management opportunities should be undertaken early in the design process. It is imperative that the approach to design, including site analysis, is intrinsically linked to making space for water. Sustainable surface water management will be particularly important to consider in the context of the requirement for new streets to be tree-lined. It is a national policy requirement that new streets are tree-lined as stated in paragraph 131 of the NPPF. Therefore, UUW wishes to recommend the following wording for inclusion within the NDP: ‘Landscaping proposals for a site, including any proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. Landscaping proposals must evaluate and identify opportunities for sustainable surface water management.’

Ground Water Resources and Groundwater Source Protection Zones
We note criterion I) of Policy ENV3 which states: ‘1. The conservation, management and enhancement of local features of interest for their biodiversity and geo-diversity will be supported and encouraged. These include: I) Protection and enhancement of surface and ground water quality to comply with the Water Framework Directive in ensuring that development does not cause deterioration in the status of inland waters.’ We wish to note that there are various groundwater sources protection zones (SPZs) which are defined by the Environment Agency which are

used for public drinking water supply purposes within the defined NDP Area. The prevention of pollution to drinking water supplies is critical. The SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The details of SPZs can be viewed on the website of the Environment Agency. We would also be happy to provide details if that would be helpful. New development sites are more appropriately located away from locations which are identified as sensitive groundwater protection areas. The strong preference of UUW is for development to take place outside of any Environment Agency designated SPZ1, as this is the most sensitive location from a groundwater protection viewpoint. We recommend that there is clear development plan policy wording which outlines the requirements for development to mitigate the effects of development on the groundwater environment and public water supply. We therefore recommend that you consider amended policy in the NDP relating to groundwater source protection zones. Our recommended criterion and associated explanatory text is set out below. 'Development proposals must accord with the latest national guidance on Groundwater Protection. Where necessary, applicants will be required to undertake a risk assessment (quantitative and qualitative) of the impact on the groundwater environment and public water supply. Development will only be acceptable where it is demonstrated to the Local Planning Authority that there will be no unacceptable impact on the groundwater environment and public water supply. Explanatory Text Where required in consultation with the Environment Agency and/or the water and sewage company, new development proposals will be expected to be supported by a risk assessment, careful masterplanning, and the incorporation of mitigation including measures to manage the impact of the construction process. Guidance on development in groundwater source protection zones is provided on gov.uk and within the 'Environment Agency's Approach to Groundwater Protection'. A quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. Subject to the outcome of the risk assessment, the mitigation measures may include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features). Biodiversity UUW supports the principle of criterion 2 of Policy ENV3 relating to biodiversity. We are keen to ensure that BNG is delivered in the most appropriate locations and without restricting the potential future expansion and operation of key operational infrastructure. The location of such infrastructure investment is often dependent on engineering circumstances. Our operational sites, such as treatment works and pumping stations, are key infrastructure for the neighbourhood which may need to expand in the future to meet growth needs or respond to new environmental drivers. We are keen to ensure that we do not sterilise land around such operational sites with BNG which could make it more difficult to meet future operational needs and necessitate infrastructure investment further into the countryside. This approach is supported by the planning practice guidance which states that the approach to BNG should be resilient to future pressures from further development. It states: 'When assessing opportunities and proposals to secure biodiversity net gain, the local planning authority will need to have regard to all relevant policies, especially those on open space, health, green infrastructure, Green Belt and landscape. It will also be important to consider whether provisions for biodiversity net gain will be resilient to future pressures from

further development or climate change, and supported by appropriate maintenance arrangements. Paragraph: 023 Reference ID: 8-023-20190721
Revision date: 21 07 2019' Woodplumpton Neighbourhood Plan - Design Code Appendix 1 UUW recommends that the design code includes a section relating to water, drainage and flood resilient design which would be supplementary to our above recommended policies on drainage and water efficiency. We wish to suggest that the design code clearly references the importance of an assessment of the hydrological context of a site which considers site topography, naturally occurring flow paths from all watercourses and drainage systems including public sewers. We would recommend the following wording for inclusion in the design code. 'Applicants will be required to undertake a hydrological assessment of the site which must consider (amongst other things) site topography, naturally occurring flow paths, ephemeral watercourses and any low lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details.' We also request that specific consideration is given to the risk of sewer flooding via inclusion of the following wording: 'The risk of flooding from any source must be considered in the design process. Applicants will be required to consult with the sewerage undertaker to confirm the nature and extent of any flood risk from sewers. This should confirm: a) if there are any sewer surcharge levels at the point of connection that could influence site design; b) whether there is an incident of sewer flooding at, or in the vicinity of, the proposed development site; and c) if sewer modelling data indicates that existing sewers that pass through or near to the site present a modelled risk of sewer flooding. This information will inform whether to apply the sequential approach. Development should not be located in an area at risk of flooding. Applicants must demonstrate that proposals do not increase flood risk and are safe. Applicants should not assume that changes in levels or that changes to the public sewer (including diversion), will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge. Drainage details, ground levels and finished floor levels are critical to ensure the proposal is resilient to flood risk and climate change. It is good practice to ensure that the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer.' With regards to water efficiency, we would suggest that your design code references the aforementioned recommended policy relating to water efficiency and requests that applicants seek to maximise the incorporation of water efficiency measures such as water butts.

Members of Public	It is imperative with all the new housing that a Health Centre be built. The local surgeries in Ingol and Fulwood are full to capacity making it very difficult to get an appointment.
Members of Public	I agree to the local planning authority undertaking a period of consultation for a minimum of 6 weeks for any planning application as per your letter ref. Woodplumpton Neighbourhood Plan dated 27th January 2023.
Members of Public	<p>I'm happy with Preston and Lancashire Council's policies. Quite why we need a Parish Council and their NIMBYism I fail to understand. This is a futile attempt to influence the Mosque building and I'm happy with the procedures already undertaken by the City Council. I'm angry that I have to subsidise these parish councillors from my Council Tax.</p> <p>The documents are straightforward and I agree with "Natural England" on page 10 of the Strategic Environmental Assessment Report in that this has no affect on anything in Europe!</p>
Members of Public	<p>It's commendable that our community is developing and I am happy that as a resident I am able to put my views through this form. I thank the council for adding Woodplumpton parish under Neighbourhood plan.</p> <p>Adding more housing means more residents and more vehicles that will causes traffic congestion. Currently we don't have enough roads and existing ones are narrow and not properly maintained. Currently most house have average two cars and when they go out during peak hours it's chaos.</p> <p>The evident example is Sandy lane were Cottam nursery located is in very bad condition.</p> <p>Rising housing developments at Hoyles lane and Tableys Lane have rapidly increased congestion in Tag Lane which resulted in long queues at roundabout which leads to M55.</p> <p>Please not that many commuters doesn't want to use these primary roads to get to city centre, but they are forced to use because of no alternative routes available to them.</p> <p>So my kind suggestion is that, the first priority of the Parish is to make new roads or expand existing roads and maintain them in proper condition.</p>
Members of Public	<p>Thank you for the opportunity to comment on the Neighbourhood plan. I saw this consultant through Preston City Council's facebook page.</p> <p>I personally feel the biodiversity and nature conservation element of this plan is weak. It heavily relies on the NPPF for biodiversity enhancement but doesn't offer any additional or stronger policies. This Neighbourhood plan is an opportunity to be clear to developers and the community that</p>

	<p>we value our local wildlife however this Plan covers the bare minimum and will rely other policies to protect our wildlife. For example, the Neighbourhood Plan states "Retention of existing trees around and within existing and future development and the encouragement of additional planting where appropriate" however this could be easily be brushed aside by a developer as 'inappropriate.' Many council's are stipulating a tree planting ratio to ensure any trees removed are replaced on a 1:2 or 1:3 basis. This whole section can be stronger to ensure that Commuted Sums from developers are put into biodiversity enhancements in the area however it reads that schools, community buildings and rights of way would be preferable to receive this money as these sections have far greater detail. I couldn't see any clear reference in this plan to encourage 'green' gardens with hedges and grass over hardstanding. This plan could be a great opportunity to ensure future development in this area results in gains in biodiversity however I feel this has been missed and as a result we will see losses of hedgerows, trees and habitat which could have been avoided through stronger wording or clear guidance.</p> <p>I was also disappointed there was little reference to climate change and flood protection. These are two issues that can be greatly influenced by the planning system and yet received very little coverage in this plan.</p> <p>I will add that apart from these points above, the remainder of the plan is very good. I do support the document and the policies identified, I just wish it could have gone further.</p>
<p>Members of Public</p>	<p>We are living in Woodplumpton , and have done for 10yrs. We feel that the area should include plans for larger quality homes - upmarket homes in the price bracket of £ 750 K to £ 1.4 million. The large increase of "affordable housing" is leading to an imbalance in north Prestons society. Preston is a friendly "Mill town" and has relatively low crime rate. However once persons progress up the wealth ladder (through business success etc) there is little housing to offer over £900K unless you move to outer districts of Preston , which many do not wish to do.</p> <p>I strongly suggest for the long term benefit of Preston that the "council" look to create "wealthier" areas. These area's provide stability and wealth for a towns future.</p> <p>We also feel that the "rule of infill" should be changed to enable "landowners"(people with 1-9 acres adjoined to house/garden) to build these larger dwellings in fields or larger gardens. Developers buy whole fields and cram them with cheaper housing whilst many "landowners" would happily develop 2-6 acres into quality houses of design, style and eco-friendly construction but can't because of this ridiculous "infill rule" The result is as described above - fields of small tightly packed houses.</p> <p>I have 5 acres which I can do nothing with because of "rule of infill" but in Woodplumpton Village many people have built houses in their gardens - resulting in an overused sewage system, traffic control problems and a sprawl of unplanned housing layouts. Most homes built in gardens are tiny, unsightly and are built on budget with little thought of design or eco friendly construction. They are purely a "money maker" - short sighted at best.</p> <p>The council should broaden its planning laws but introduce a more stringent design requirement to include eco friendly designs and modern attractive country dwellings.</p>
<p>Members of Public</p>	<p>My comments are not about the substance of the plan, but about the schedule of evidence in the Neighbourhood Plan document (p60).</p> <p>I was looking for the Woodplumpton Character Assessment, and in Appendix 2 the document refers the reader to the Parish Council's website:</p> <p>"Woodplumpton Character Assessment https://www.woodplumptonparish.org/"</p> <p>However, I was unable to find the Character Assessment on this site. A search of the sitemap was fruitless:</p> <p>https://www.woodplumptonparish.org/usersitemap.php</p>

	<p>I did find the document via a Google search, but it's on the City Council website at:</p> <p>https://www.preston.gov.uk/media/8521/Woodplumpton-Character-Assessment-September-2018/pdf/WOODPLUMPTON_CHARACTER_ASSESSMENT_Submission_Version.pdf?m=637685228667030000</p> <p>Please can this document be made available on the Parish Council website, as indicated. It would be ideal to include in Appendix 2 the exact URL of the character assessment PDF.</p> <p>In addition, Appendix 2 features this URL, which is a broken link:</p> <p>https://www.woodplumptonparish.org/parish-plan.php</p> <p>The actual URL for the old Parish Plan is:</p> <p>https://www.woodplumptonparish.org/downloads/parish-plan.pdf</p> <p>Finally, this link in Appendix 2 also returned 404 - Page not found:</p> <p>https://www.preston.gov.uk/yourservices/planning/planning-policy/monitoring/</p> <p>That needs updating, too.</p>
Members of Public	Fully support this draft plan, which has been fully consulted on with local residents. The proposals in the plan will ensure that the distinctive character of Woodplumpton Parish is enhanced and that the area is safe and secure for all, which is of paramount importance. I fully support the proposed policies contained within the plan.

Table 2: Examples of Regulation 16 Consultation Undertaken by PCC

Description	Example
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Woodplumpton Neighbourhood Plan (current application)

Woodplumpton Parish Council submitted a revised version of the draft Woodplumpton Neighbourhood Plan on in November 2022, following comments provided by the City Council to the prior July 2021 submission.

The Council is now seeking your views in relation to the November 2022 draft neighbourhood plan, prior to submitting it to independent examination.

[Regulation 16 of the Neighbourhood Planning \(General\) Regulations 2012](#) (as amended) requires the local planning authority to undertake a period of consultation for a minimum of 6 weeks.

The period of consultation will run from 9am Wednesday 8 February 2023 to 5pm Wednesday 22 March 2023.

How do I take part in the consultation?

Consultation
Letter

Date: 27-January-2023
Our Ref: Woodplumpton Neighbourhood Plan
Ask For: Lucy Henwood
Telephone: 01772 906727



Directorate of Development and Housing
Preston City Council
Town Hall
Lancaster Road
Preston
PR1 2RL

www.preston.gov.uk/planning

Dear Sir / Madam

The Neighbourhood Planning (General) Regulations 2012 (as amended)
Notice under Regulation 16 – Notification of receipt of a Neighbourhood Plan
proposal

The Woodplumpton Neighbourhood Area was formally designated as a Neighbourhood Planning Area by the City Council in June 2017.

Woodplumpton Parish Council re-submitted the Draft Woodplumpton Neighbourhood Plan in November 2022, following comments provided by the City Council to the prior submission in July 2021.

We are now seeking your views, prior to submitting the plan for independent examination.

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) requires the local planning authority to undertake a period of consultation, for a minimum of 6 weeks. The consultation period will run from **9am Wednesday 8th February to 5pm Wednesday 22nd March 2023.**

Representations may be made to the Council by email to: planningpolicy@preston.gov.uk or in writing to:

Planning Policy,
Preston City Council,
Town Hall
Lancaster Road,
Preston,
PR1 2RL

Any representations made may also include a request to be notified of the local planning authority's decision (under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended)).

All representations **must be received** on or before **5pm 22nd March 2023.**

The Neighbourhood Plan and associated documents (including an updated Consultation Statement and supporting documents, and a Basic Conditions Statement) are available to download on the City Council [website](https://www.preston.gov.uk/woodplumptonnp) - <https://www.preston.gov.uk/woodplumptonnp>

Hard copies are also available upon request during normal office hours at Preston Town Hall (address as above).

Further background and supporting information can also be found on the Woodplumpton Parish Council website.

If you require any further assistance or have any questions, please contact Lucy Henwood by email at l.henwood@preston.gov.uk or on 01772 906727.

Yours faithfully

Planning Policy|

Neighbourhood Plan - Woodplumpton Consultation
February 2023

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The Woodplumpton Parish Neighbourhood Area was formally designated as a Neighbourhood Planning Area by Preston City Council in June 2017.

Following earlier consultation and comments received, Woodplumpton Parish Council submitted a revised version of the draft Woodplumpton Village Neighbourhood Plan in July 2021.

We are now seeking your views, prior to submitting the plan for independent examination.

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) requires the local planning authority to undertake a period of consultation, for a minimum of six weeks.

The Neighbourhood Plan and associated documents (including an updated consultation statement and supporting documents, and a basic conditions statement) are available to download via the 'find out more' link below.

**Please have your say no later than
5pm Wednesday 22 March 2023**

[Find out more](#)

More info:

[Have Your Say](#)

This consultation is open from
Wednesday 8th February until
5pm Wednesday 22nd March 2023

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