### Modification

1: Evidence why available/ suitable/ achievable?

2: Agree with preferred site?

3: Comments on document

4(1): Legally compliant?  No

4(2): Sound?  

5(1): Not positively prepared?  

5(2): Not justified?  

5(3): Not effective?  

5(4): Not consistent with national policy?  

6: Reasons not legally compliant/unsound

The NPPF requires Local Plans, as a whole to set out a positive strategy for the conservation and enjoyment of the historic environment. This means ensuring that the sites put forward for development will assist in delivering such a strategy.

The selection of sites for development needs to be informed through the evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets in the Plan area. Where adverse impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation.

The allocation of sites for development may also present opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk.

Where relevant, policies for allocated sites may need to refer to identified historic environment attributes in order to guide how development should be delivered. For example, this might require the policy to include detailed criteria or providing supplementary information within the supporting text.

The Plan (section 5) does not refer to the need to consider the historic environment in its site selections. Therefore, it fails to ensure the conservation and enhancement of the historic environment and is not consistent with the principles of sustainable development in the NPPF.
Councills response

English Heritage agreed that if the Council undertakes a heritage impact assessment and expanded on the potential impact and mitigation relating to the heritage assets close to the proposed sites in the document, they would withdraw their objection. A heritage impact assessment has been undertaken in co-operation with English Heritage and they agree that mitigation will secure an acceptable relationship between development on the proposed site and the designated heritage asset. A new paragraph 5.13 relating to the historic environment has been inserted into the Proposed Allocation Document in order to satisfy the other points raised.

On 21 August 2014 English Heritage confirmed "English Heritage welcomes the approach taken on the sites and broadly accepts the conclusions and proposed mitigation measures in the heritage impact assessment (to be included within the Appendix of the Sustainability Appraisal), as well as the amendments to the Plan itself. In view of the above, English Heritage wish to withdraw their objection to these matters with regards the soundness of the Plan".
Title: Mr  First Name: Alan  Last Name: Martindale  Organisation: 

Site/location

Paragraph/section

Modification

1: Evidence why available/ suitable/ achievable?

2: Agree with preferred site?
No

3: Comments on document
The best site would be adjacent to the Hartwood/M61 roundabout (where the circus visits). Ease of access, the hassle, space.

The site preferred by Chorley Council is difficult to access from the M61 and the plans do not indicate which part of the fields is to be allocated. This site is vast. Show us where you mean then we can comment.

The Yarrow Bridge Site is adjacent to an existing caravan site so would not be a problem i.e. not any different - Green Belt comment is not relevant if there is a caravan site there already.

4(1): Legally compliant?

4(2): Sound?
No

5(1): Not positively prepared?

5(2): Not justified?

5(3): Not effective?

5(4): Not consistent with national policy?

6: Reasons not legally compliant/unsound
The best site has not been listed. See answer to question 3.

7: Necessary changes
Better site not listed.

8: Participate in examination?
No

9: Reason participation necessary

Councils response

The site referred to is allocated as employment land - EP1.3 Land to North East of M61 Junction (Gale Moss) in the Chorley Local Plan 2012-26. It is a 6.9ha prime employment allocation considered suitable for B1 (Business), B2 (General Industrial) and B8 uses (Storage and Distribution). It forms an important site for employment land supply in the Borough and has therefore not been considered as an allocation for Gypsy and Traveller provision. Accordingly, a Traveller site allocation would be contrary to Chorley Local Plan Policy EP1: Employment Site Allocations and Central Lancashire Core Strategy Policy 10: Employment Sites and Premises which seek to protect such sites for employment use. The site is in private ownership therefore the Council has no control over the land and cannot ensure deliverability.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
I object to Traveller sites being brought into Chorley, it is totally unfair to claim Traveller status and then want to live on a permanent site. Please explain what a Traveller site consists of and what differences there are from buying a house like the rest of us have to do.

Are they free from Council Tax? Do you provide services and benefits to them? How many people and houses/caravans will be on the site? Are you giving them the land for free? Why is this right and how can it be fair to others that pay tax? Are these benefits available to me, if not why not, please explain what I have to do to become eligible to receive these benefits of being given a place to live when I have worked hard for over 40 years to sustain living in Chorley. Can you please explain what these sites are and why they are allowed to be created, everyone has to pay tax etc. and work why should anyone be allowed to get round the system, that is unfair on the people that are currently paying for services from the Council.

I hope that Healey Nab is not going to be compromised and the site is not planned on Green Belt land.

This is being brought in without any proper consultation of residents.
a separate Gypsy and Traveller and Travelling Showpeople local plan. The preferred site is located on land currently allocated for housing and employment uses. Planning policies are in place to ensure that Healey Nab is not 'compromised'. The Council's Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley local Plan 2012-2026.

Information on sites for development has been gathered from various sources over a number of years:
- The first call for sites was carried out by Chorley Council for a six week period in September/October 2005.
- The second was carried out jointly with Preston and South Ribble Councils for a six week period in July/August 2007. Landowners and developers were invited to put forward land for consideration for development.
- A further community survey relating to site suggestions ended on the 26th January 2010. The intention of this exercise was to ascertain whether the community felt that there were sites that would be particularly suitable for non-built development e.g. sport and recreation or conversely be protected from changes of use. After this deadline the Council continued to accept other site suggestions.
- The January 2010 community survey consultation resulted in a site for travelling Showpeople being suggested at Yarrow Bridge. This is one site now out for consultation.
- The Issues and Options Discussion paper brought together results of the ‘call for sites’ exercise and was the first proposals stage of the Site Allocations and Policies paper (now Chorley Local Plan). Consultation ran from December 2010 until February 2011.

Following the above the Local Plan went through further stages:
- The Preferred Option consultation on the Site Allocations and Development Management Policies ran from 16 September 2011 and was originally planned to end on the 28 October 2011 however this was extended by three weeks to the 18 November 2011 due to the amount of public interest it generated.
- The Publication deposit stage of the Chorley Local Plan 2012-2026 (previously referred to as the Site Allocations and Development Management Policies Development Plan Document) ran from 19 October 2012 for six weeks to 30 November 2012.
- The Local Plan was submitted to the Planning Inspectorate in December 2012 and the Examination was held in April 2013.

Furthermore the Council undertook consultation with Gypsy, Traveller and Travelling Showpeople themselves and engagement with relevant stakeholders and Chorley’s temporary and permanent Traveller residents as part of the Central Lancashire Gypsy and Traveller Accommodation Assessment (GTAA - summer 2013 and still ongoing). Gypsy and Traveller and Travelling Showpeople Assessment (GTAA) matters have been reported to the Central Lancashire Joint Advisory Committee over a number of years.
All the above Local Plan stages have also been reported to Chorley’s Executive Cabinet as part of the plan making process and on-going consultation. Elected members have endorsed this approach at Full Council.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.
Comments have been submitted and considered regardless of whether or not they use the representations form.

Although in the Green Belt the Hut Lane site has been included in the Council's assessment because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites. A planning Inspector in May 2012 (Appeal Ref: APP/D2320/A11/2159688) confirmed the site is greenfield. The Hut Lane site is contrary to Core Strategy Policy 1 (Locating Growth); and Policy 8 (Gypsy and Traveller and Travelling Showpeople Accommodation) as the site would fall foul of criterion (a) as it does not have good access to a number of services.

The Hut Lane site is not considered suitable for allocation because it has a poor sustainability score - Band D - representing the least sustainable site considered. Hut Lane is located in the Green Belt and in accordance with national policy is discounted because there are no very special circumstances to warrant selection of a site in the Green Belt.
When a site has been formally identified Lancashire Constabulary Architectural Liaison Officers will work in partnership with the implementation team to design out the opportunity for crime and disorder at the location. A site specific Crime Impact Statement will be designed using Crime Prevention Through Environmental Design techniques which create safe and sustainable environments to live and work.

Elements of security that will be considered as part of this process will include the layout of the scheme, enhancing opportunities for natural surveillance, perimeter security, location of play areas, landscape design, lighting levels, car parking and access arrangements.

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared? □

5(2): Not justified? □

5(3): Not effective? □

5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response Noted. The Council will continue to liaise with the Lancashire Constabulary.
We note that agricultural classification is included in the Sustainability Appraisal (SA) environmental objectives but that there is no differentiation between grades 3a and 3b which is the difference between good and moderate quality agricultural land. Natural England advise that in order to ensure that the most sustainable option is selected it would be advisable to provide some more detail on land quality and to evidence your consideration of the issue as part of the SA. The Local Plan should give appropriate weight to the roles performed by the area’s soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. (Detailed references provided).

Habitats Regulations Assessment:

We have no comment to make in relation to the HRA at this time.

Duty to Cooperate:

Natural England are satisfied that you have fulfilled your strategic duty to cooperate with us in relation to this consultation.

The approach to assessing sustainability has been used for all the housing and employment sites allocated in the Chorley Local Plan 2012-26 and has been considered robust by the Local Plan Inspector, it covers Agricultural Classification under EN1, and has been found sound by the Inspector in her partial report. The proposed site is allocated for a mix of housing and employment in the Chorley Local Plan and as such the principal of development has already been accepted. The Council will continue to liaise with Lancashire County Council in respect of
Agricultural Land classifications with a view to protecting the best and most versatile agricultural land (Grades 1, 2 and 3a) in accordance with Core Strategy Policy 31: Agricultural Land.
Support noted. Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.
WLBC has no objections to the proposed allocation of land at the preferred site for the provision of five Traveller pitches. WLBC supports Chorley BC's stance of meeting its Traveller accommodation needs within its own administrative boundary. WLBC considers that the document is legally compliant and sound in these respects.

With regard to the Duty to Co-operate, WLBC considers that Chorley BC has engaged adequately and appropriately with WLBC throughout the preparation of the document thus far.
Thank you for consulting Bolton Council on your Local Plan modifications to address the needs of Travelling communities. I have now had the opportunity to review both the Gypsy and Traveller and Travelling Showpeople Preferred Options document and Draft Duty to Cooperate Supplement.

As you are aware Bolton Council raised objections at both preferred sites and formal publication stages, the basis of both being the lack of up to date evidence on needs and the consequent decision not to allocate sites.

The modifications being proposed do address our objections. While your Inspector still has concerns with the underlying evidence base, a revised GTAA has identified the needs of the Gypsy community, this needs figure will be included in the plan and a site allocated under a new policy HS11. All these are welcome. I do not feel it appropriate to express any views on specific sites, but clearly the approach taken in terms of site selection may be worth further investigation in developing our own Traveller plan in due course.

In addition we welcome the further modification which proposes further GTAA work to establish whether there are additional needs of both the Gypsy and Travelling Showperson communities, the outcomes of this study and potential additional site allocations being addressed through the production of a separate Gypsy and Traveller and Travelling Show People Accommodation Local Plan jointly with the neighbouring authorities of South Ribble and Preston.

As an adjoining authority we welcome further opportunities for discussion and consultation with Chorley on this further work.

I am content to confirm that you have satisfied the Duty to Cooperate with Bolton and the Draft Duty to Cooperate Statement provides a useful summary of cooperation with prescribed bodies under Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Section 110 of the Localism Act 2011). We have been kept in touch regularly with the process.

In conclusion Bolton supports the proposed changes being made and withdraws its original objections. I will enter representations on the form for completeness. I also confirm that Chorley has complied with the Duty to Cooperate and we welcome continued involvement on matters of strategic and cross boundary importance. I hope this assists in ensuring that your Local Plan can now progress smoothly to adoption, following re-opening of the examination in September.
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<td>Support noted.</td>
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Bolton Council welcomes this modification which now includes within the plan a needs figure for the Gypsy community based on revised evidence from the 2013 GTAA, a site allocation to meet this need, together with a commitment to further work investigating the needs of the Travelling community including Travelling Showpeople and based on the outcome of this work production of a joint Traveller plan with South Ribble and Preston.

The modifications being proposed, taken together, do appear to meet the test of soundness. They are positively prepared as the end result is a positive strategy to meet needs through making allocations for the Travelling community together with a mechanism for further review of needs and site allocations through a separate plan as necessary.

The approach is justified being backed up by a recent GTAA which, while the Inspector still has reservations, forms a solid basis for proceeding at this stage. There is clear evidence through the site section process of evidence of participation in the process including consultation with adjoining authorities including Bolton and other stakeholders. The site selection process sets out compliance with Core Strategy Policy.

It is effective through the allocation of a specific site. Information with the preferred options sets out how deliverability would be achieved.

The approach is consistent with the requirements of the NPPF. Need has been identified and a site identified accordingly.

Support noted.
Bolton Council welcomes this modification which now includes within the plan a new policy HS11 which allocates a site to meet identified need for Gypsy provision.

The modifications being proposed, taken together, do appear to meet the test of soundness. They are positively prepared as the end result is a positive strategy to meet needs through making allocations for the Travelling community together with a mechanism for further review of needs and site allocations through a separate plan as necessary.

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It is effective through the allocation of a specific site. Information with the preferred options sets out how deliverability would be achieved.

The approach is consistent with the requirements of the NPPF. Need has been identified and a site identified accordingly.

Councils response: Support noted.
Bolton Council welcomes this modification which sets out the progress on the production of the Transit and Travelling Showpeople Local Plan as an additional indicator to the Key Indicators and Targets Table. This clearly sets out Chorley's commitment to progress this plan following further evidence base work.

The modifications being proposed, taken together, do appear to meet the test of soundness. They are positively prepared as the end result is a positive strategy to meet needs through making allocations for the Travelling community together with a mechanism for further review of needs and site allocations through a separate plan as necessary.

The approach is justified being backed up by a recent GTAA which, while the Inspector still has reservations, forms a solid basis for proceeding at this stage. There is clear evidence through the site section process of evidence of participation in the process including consultation with adjoining authorities including Bolton and other stakeholders. The site selection process sets out compliance with Core Strategy Policy.

It is effective through the allocation of a specific site. Information with the preferred options sets out how deliverability would be achieved.

The approach is consistent with the requirements of the NPPF. Need has been identified and a site identified accordingly.

Councils response: Support noted.
1: Evidence why available/ suitable/ achievable?

Bolton Council welcomes this modification which would amend the Policies Map to include the allocation of site/s for permanent pitches for Travellers.

4(1): Legally compliant?

4(2): Sound? Yes

5(1): Not positively prepared? No

5(2): Not justified? No

5(3): Not effective? No

5(4): Not consistent with national policy? No

6: Reasons not legally compliant/unsound

The modifications being proposed, taken together, do appear to meet the test of soundness. They are positively prepared as the end result is a positive strategy to meet needs through making allocations for the Travelling community together with a mechanism for further review of needs and site allocations through a separate plan as necessary.

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It is effective through the allocation of a specific site. Information with the preferred options sets out how deliverability would be achieved.

The approach is consistent with the requirements of the NPPF. Need has been identified and a site identified accordingly.

7: Necessary changes

8: Participate in examination? No

9: Reason participation necessary

Councils response Support noted.
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<th>Title:</th>
<th>Mrs</th>
<th>First Name:</th>
<th>Valerie</th>
<th>Last Name:</th>
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When allocating land for the use of Gypsy, Travellers, and Travelling Showpeople, it is advised that Chorley Borough Council take into consideration Policies 94 and 99 of the National Planning Policy Framework (NPPF) which requires Local Planning Authorities to take account of flood risk during the plan making process.

It should be noted that a change in use of land or buildings, undeveloped or existing, may cause a change in flood risk vulnerability classification. Land allocated for Gypsy, Travellers, and Travelling Showpeople could potentially be placed under two classifications in line with Paragraph 66 of the National Planning Practice Guidance (NPPG):

1. Highly vulnerable – Permanent sites with planning permission that are used by Gypsy, Roma or by Travelling Showpeople.
2. More vulnerable – Official transit sites (short term stopping sites) used by GRT (although I don't think we have any in the county) and possibly sites used regularly by show people year on year.

Occasionally unauthorised encampments may occur, where Travellers stop without permission for a short time, or unauthorised development of a permanent Gypsy, Roma or Travelling Showpeople site without planning permission.

The proposed sites in the Chorley Gypsy & Traveller and Travelling Showpeople Preferred Options document should only be considered based on their proper use. The sequential and exception tests, as detailed in the NPPF (Policy 100) and the National Planning Practice Guidance (NPPG), should be used to ensure that land allocated for this purpose is directed away from areas of the highest risk.

It is recommended when undertaking any accompanying Sustainability Appraisal acknowledgement should be given to flood risk from "local" sources in addition to that from flooding from main river and coastal sources (i.e. river flood zones). Local sources of flooding encompass flooding from ordinary watercourses, surface water and groundwater.

**ASSESSMENT OF FLOOD RISK FOR EACH SITE ON FILE**

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared? ☐

5(2): Not justified? ☐

5(3): Not effective? ☐

5(4): Not consistent with national policy?

6: Reasons not legally compliant/unsound

7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

Comments Noted. Flood risk issues have informed the detailed site assessments. Comments from United Utilities and the Environment Agency have been addressed in the review of the assessment of each site (refer to Proposed Allocations Document September 2014 - Appendix 2 -Site Information and Sustainability Appraisal section on each of the 9 sites)
I think it should be brought to your attention that neither you, nor any other local Councillor, or indeed, any local or national political bloc, have the mandate to provide sites for Travellers.

What needs to be done before any further decisions are made, is to hold a local referendum to gain the permission, or not, of the people of Chorley Borough as to whether they wish to have sites for Travellers within the borough. Not to do so, in my opinion, would not only be undemocratic, but a flagrant breech of the human rights of every single member of every single community in Chorley Borough. A democratic resolution should be at the forefront of Council actions concerning this situation and not the so-say of unelected civil servants sitting in their ivory towers.

Once the results of the referendum are confirmed, then Chorley Borough Council can proceed in the knowledge that they are indeed fulfilling the wishes of the people who matter and not following the inept instructions of those who, in political terms, matter not. I therefore look forward with interest to the decision Chorley Borough Council arrive at.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.
I comment on the above document on behalf of the National Federation of Gypsy Liaison Groups. Whilst the plan may be legally compliant it is not sound and, in our view, has not been positively prepared.

The consideration given to the sites listed in appendix 2, suggested by the Traveller Community at Hut Lane is superficial and in stark contrast to those selected for consideration. All the sites listed in appendix 2 which are in the Green Belt are dismissed solely on the grounds of their location in the Green Belt, yet several sites suggested by the Council within the Green Belt have been given detailed consideration.

The dismissal of a site suggested by the Traveller Community at Hut Lane simply because the Council could not be bothered to locate it also suggests a discriminatory approach.

Site 9, with temporary permission at Hut Lane, should be allocated. It has too easily been dismissed. The fact that it cannot easily accommodate 5 pitches does not mean it cannot contribute to Traveller provision.

The Council has looked at sites put forward by the Gypsy and Traveller community as identified at Appendix 2 of the Preferred Options Document. All are in private ownership therefore the Council has no control over the land and cannot ensure deliverability; a number have been granted planning permission; a number are in the Green Belt and are deemed inappropriate development in the Framework and Planning Policy for Traveller Sites; and a number lie within a high risk flood zone. The Council endeavoured to find the location of all sites identified but were not able to identify the exact location of one site as not enough information or exact site details were provided by the Gypsy and Traveller community despite providing plans of the borough and having a meeting. The Council has assessed land in its ownership, over which it has control and therefore can ensure deliverability, for suitability as a permanent Gypsy and Traveller site for a minimum of five pitches. The Council has also
asked other stakeholders with major landholdings whether they have any suitable land available and they have confirmed that they do not have any suitable sites. In addition the Council has looked at site suggested through its "call for sites" for the Local Plan in 2005 and 2007.

Although in the Green Belt the Hut Lane site has been included in the Council's assessment because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites. A planning Inspector in May 2012 (Appeal Ref: APP/D2320/A11/2159688) confirmed the site is greenfield. The Hut Lane site is contrary to Core Strategy Policy 1 (Locating Growth); and Policy 8 (Gypsy and Traveller and Travelling Showpeople Accommodation) as the site would fall foul of criterion (a) as it does not have good access to a number of services. The Hut Lane site is not considered suitable for allocation because it has a poor sustainability score - Band D - representing the least sustainable site considered. Hut Lane is located in the Green Belt and in accordance with national policy is discounted because there are no very special circumstances to warrant selection of a site in the Green Belt.
The NFU is a professional body which represents the interests of approximately 75% of all farmers and growers and has 2000 members in the county of Lancashire. We have compiled the following comments in response to your consultation on your Gypsy and Travellers and Travelling Showpeople Local Plan Consultation. Our views are on behalf of the farming and land management sector in general. We do make our comments in the knowledge that the Council is under a duty to assess the need for Gypsy and Traveller sites in its area and is under pressure to plan for sites over a reasonable timescale.

Our primary concern is that the consultation document does not include enough information on how these sites would affect local infrastructure and the nearest settled community.

The local farming community must be fully consulted on sites and given access to information on site selection. It must be remembered that farmers are running businesses on their land and that they also have long term plans for the future. Sites must be selected so that they take consideration of the practical aspects of running a farm business for example by avoiding sites with close proximity to livestock units, or opposite busy farm entrances. They should avoid using quality agricultural land.

I hope that you find our contribution to the consultation useful. If you require further information or clarification of any of the points raised in the response please do not hesitate to contact me.

The approach to assessing sustainability has been used in all the housing and employment sites allocated in the Chorley Local Plan 2012-26 and has been considered robust by the Local Plan Inspector and has been found sound in her partial report. The Council will continue to liaise with Lancashire County Council in respect of Agricultural Land classifications with a view to protecting the best and most versatile...
agricultural land (Grades 1, 2 and 3a) in accordance with Core Strategy Policy 31: Agricultural Land.
We write to object to your consultation document because it appears to have been prepared in a rushed manner with no proper consultation of the residents of Chorley. As a business in Chorley, paying business rates, employing local residents and contributing to the local economy we feel your documentation is poorly prepared and does not reach sound conclusions. Although the Council may be under the obligation to provide facilities for the above it should be done in an economic, even handed, and discreet way to ensure that Chorley remains a place where people want to live and work. There is no incentive for local businesses like ourselves to pay rates to be used for exceptionally expensive housing of families which give no economic benefit and have no connection with Chorley. The Council doesn't put this amount of funding into the homeless of Chorley. This detracts from existing residents and provides a disincentive to invest in Chorley businesses and also potentially risks investment in potentially new Chorley businesses. Any site chosen must be discreet, small and economically viable. Your preferred choice does not do this and therefore needs to be reassessed.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of sites received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the
Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.
The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan. Funding may be available from the Homes and Communities Agency.
This supporting statement is submitted on behalf of the Linfoot / Bird family as part of our response to the Gypsy and Traveller and Travelling Showpeople Preferred Options Consultation. It should be read with the on line response form I have submitted through Survey Monkey. It builds on my letter to you on 14 April, and the meeting that Mr and Mrs Linfoot, Mr Bird and I attended on 7 July with Jenny Moore, Chris Moister, Stephen Lamb and yourself.

The family shares the Inspector’s concerns about the robustness of the Central Lancashire Traveller Accommodation Needs Assessment (GTAA) published in January 2014, and welcomes the intention to carry out further work on it leading to a joint Traveller DPD with Preston and South Ribble councils.

The family understands that the GTAA suggests a need for 5 permanent pitches to 2026, and that this is based on the needs of those currently living on the Hut Lane site, that is Mr and Mrs Linfoot and their children, Mr and Mrs Bird, and their grandson, Clonus Boswell, together with assumptions about how their needs may grow over time as the young people marry and have families.

The family contends that this is likely to be an underestimate in two senses. It doesn’t take adequate account of other Travellers, who have not been identified, are living in houses, or are unable to live in the area more than fleetingly because of the lack of accommodation. These issues should be revisited through the refresh of the GTAA.

But in regard to the family itself they need accommodation equivalent in scale to 5 pitches now (albeit laid out as an extended family site), and with potential for subsequent further expansion, rather than 5 pitches over the period of the plan, because, as outlined in the 4th and 5th paragraphs of my letter to you of 14 April, the survey failed to take account of the needs of Mrs Linfoot’s sister and brother and their families.

Anne-Marie Boswell and family are living on the public site in Blackpool. John Bird and his family are currently without secure accommodation, and survive by living at the roadside, and staying on friends’ pitches. Both see Chorley as their home, are only not resident in Chorley because of the lack of authorised accommodation, were previously resident on Hut Lane, and would wish to live as part of the extended family.

A key objective for the family is to feel secure within their own site under their own control. Because of tensions between families and poor management not all public sites are good places to live. For that reason they have a very strong preference for a site in their own ownership and control, if possible through freehold ownership. This emphasis on private site provision is consistent with national policy, see the fifth bullet to Planning policy for traveller sites paragraph 4. The family would also make the point that such an approach is likely to work well for the Council and wider community, once established. The Council knows who they are dealing with. They are known and involved within the local community. There wouldn’t be the ongoing maintenance and management costs there will be with a public site.
They support the proposal for a 0.4 hectare site. If they were able to acquire it they would wish to see it developed as an extended family site, rather than divided into discrete pitches.

In terms of the family resident on Hut Lane, they have current needs for two mobile homes, three touring caravans, of which one would only be in storage while on site, a double utility block, plus parking for three vans and two cars. They would also welcome incorporating a play area / garden for the children. Factoring in the needs of the extended family excluded from Chorley, they would want the site to be able to accommodate an additional two touring caravans, and parking for two vans and one car.

Travellers generally have a strong preference for sites in the countryside, or on the fringe of urban areas, and for both Travellers and the settled community sites tend to work best where the Traveller site is a little away from or other residential properties or can be made to feel so.

Their first preference would be to remain on their existing site, particularly if they were able to acquire the other half of the original Hut Lane site. At the same time the family recognise that a permanent use of the existing site is unlikely to be compatible with Government policy towards green belts.

In terms of the alternative sites in the Preferred Options document, the family’s strong preference is for the Council’s preferred site at Cowling Farm. It is on the edge of the built up area of Chorley, close to where the family currently live, has the potential to provide an attractive residential environment, and is mid way between where the Linfoots children go to school at Adlington Primary School and Southlands High School.

In addition to security of tenure, a key objective for the family would be to enable the site to be delivered quickly and without substantial disruption from the subsequent development of the rest of the site. The most satisfactory way of achieving this would be to locate the Traveller site in the bottom south-west corner of the larger site with its own access from Cowling Road / Weavers Brow, as shown on the attached plan. We would support an approach which developed native species hedgerows and trees on the eastern and northern boundaries of the site, complementing those which already exist on the western and southern boundaries. This would be an issue for the Inspector, but we wonder whether a light touch access road of say gravel as opposed to tarmac, giving access to the Traveller site alone might be seen as acceptable through the green belt without the need to amend green belt boundaries.

In terms of the other sites in the Options Consultation, the other site that could be attractive to the family would be Harrison’s Farm, Adlington, but only the area south west of the farm-house with access from Old School Lane, and providing it could be established that the bend around the Old School House could be made suitable for bringing in mobile homes. (Access from the east over the humped canal bridge would clearly be impossible.)

The family do not see Yarrow Bridge or the land off Westhougton Road as likely to be acceptable given national green belt policy. If an exceptional case could be made for excluding land from the green belt their strong preference would be to remain on Hut Lane (which would involve no additional implementation costs) to be excluded. The Westhougton Road site has the additional complication of the uncertainty over ownership.

The within Chorley sites would not be as attractive to the family, based on the likely
opposition and hostility of local residents. Ackhurst Road has the additional complication of the lease of the land for parking. Crosse Hall Lane may be too small, is in a visually prominent position, and the family understand that the neighbouring school has ambitions to extend on to it.

The above comments suggest that Cowling Farm should be the Council’s preferred option for incorporation as a modification, but with greater specificity about precisely where the site should be located within the site. We would also suggest the text should indicate that a site should have capacity for the equivalent of five permanent pitches.

In terms of the proposed amendment, Ref MMEC66 replacing the original Paragraph 5.7, we would want to see the new paragraph 5.7 recognising the serious accommodation shortage on the lines: ‘There is a critical shortage of accommodation for Gypsies, Travellers and Travelling Showpeople nationally, regionally and locally within Central Lancashire. National policy ‘Planning policy for traveller sites’, March 2012 highlights that the traditional and nomadic ways of life of Gypsies, Travellers and Travelling Showpeople should be facilitated while respecting the interests of the settled community, and aims to increase the number of sites to address under provision and maintain an appropriate level of supply.’

4(1): Legally compliant? Yes
4(2): Sound? No
5(1): Not positively prepared? No
5(2): Not justified? Yes
5(3): Not effective? No
5(4): Not consistent with national policy? No
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination? Yes
9: Reason participation necessary

My clients the Linfoot/Bird family have been key players in the saga of making planned provision for Gypsies and Travellers in Chorley with a strong likelihood of ending up living on the proposed site.

Councils response
Comments and support noted for the Cowling Farm site. See section 8 of the Proposed Allocation document for analysis of sites and section 5 for costings of sites. No change is proposed to the proposed modification MMEC66 para 5.7 text because the Council are making provision for a permanent Gypsy and Traveller site in the Borough within the Local Plan. Para 5.10 of the proposed modifications is explicit that there may be a need resulting from overcrowding on existing site, concealed households or those living in bricks and mortar which the current GTAA has been unable to identify. Para 5.11 of the proposed modifications confirms the Council now commits to undertake further work on the Gypsy and Traveller Accommodation Assessment (GTAA), this work has now started. Para 5.11 of the proposed modifications also indicates the Council will prepare a joint Gypsy and Traveller and Travelling Showpeople Accommodation Local Plan in line with the outcomes of the further GTAA work, to include transit site provision. The 5 pitches is expressed as a minimum in view of the absence of information to quantify the final need. The Local Plan Inspector has determined that the matter of more specific need will be addressed through additional Gypsy and Traveller Accommodation Assessment (GTAA) study work and this is to be considered in a
separate Development Plan Document (DPD). The existing Traveller current need has been quantified at 2 pitches in the draft GTTA. Their future need will be addressed through the additional GTTA and related DPD work. In accordance with national guidance, the needs of the existing Traveller community will inform final site selection, design and layout.
It is implied that the Council have already decided that a site should be allowed and all that remains is where. Our countryside was never intended for this purpose and the aesthetic beauty of it would be damaged accordingly. I therefore believe that this site nor any other in Chorley are suitable for this purpose. I cannot see how this forms part of any normal housing policy. There remain many brownfield sites in urgent need of redevelopment for much needed housing. Owners of areas that are left as eyesores for many years with nothing being done should have their Council Tax increased each year to prompt redevelopment and prevent dereliction. This is where the Council must focus its attention.

Chorley Council say: Chorley Council should include a policy (or policies) that departs from national policy to meet a clearly identified and fully justified local need.

If such a policy exists then that fully justified local need is to maintain a standard of living and sanity for everyone having chosen to reside in Chorley as long-term residents in normal housing.

The Council considers that actual or perceived impact on businesses is not a material planning consideration including perceived detrimental economic impact on a public house.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents.
and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- the land is owned by the Council and is deliverable and developable
- a dedicated access is achievable
- the land is within the settlement of Chorley and accessible to services and facilities
- it has the potential to meet the needs of the existing Traveller community at Hut Lane
- the site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- it is sustainable, scoring B and would be compliant with the Core Strategy key policies
- the land is allocated for housing and employment, therefore the principle of housing development is established.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan. Chorley Council considers its policies and approach fully compliant with national guidance.
1: Evidence why available/ suitable/ achievable?
No

2: Agree with preferred site?
No

3: Comments on document
Cowling Farm is the most expensive option being considered, other than being the same cost as Harrisons Farm, Adlington.

The proposal takes no account of the fact that this site is in Green Belt, other potential sites are discounted because they are in the Green Belt, quoting Government guidance that Traveller sites in the Green Belt are inappropriate development. How then can this site be suitable.

The proposal will have a devastating effect on The Spinners, Chorley, a well known destination food house so it is incorrect to say ‘there are no identified economic effects in developing this site’.

Finally, the proposed access to the proposed Traveller site is in fact the car park of The Spinners which is held on lease from the Council until December 2079.

4(1): Legally compliant? No
4(2): Sound? No
5(1): Not positively prepared? 
5(2): Not justified? 
5(3): Not effective? 
5(4): Not consistent with national policy? ✓
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination? Yes
9: Reason participation necessary
This existing well established business will be slaughtered if this proposal goes ahead. We need to defend our property and business and that of our tenant.

Councils response
Cowling Farm is the most expensive option, along with Harrison's Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency.

The site is not located within the Green Belt. The site is within the settlement of Chorley. It is an employment allocation in the adopted Local Plan and is allocated for both housing and employment in the emerging Local Plan.

The access to the proposed Gypsy and Traveller site has yet to be finalised.

Lancashire County Council Highways (LCC) have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site (including access through the Spinners Arm car park - see Proposed Allocations Document - Appendix 2 - Site
Information and Sustainability Appraisal - Cowling Farm, Chorley - Lancashire County Council Highway comments - (b)) with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm.

The Council considers that actual or perceived detrimental economic impact on a public house is not a material planning consideration.
The site is adjacent to Cowling Farmhouse (Grade II). The NPPF considers that any substantial harm to or loss to the significance of a Grade II listed asset (including setting) should be exceptional.

The site's close proximity to a designated heritage asset will require development proposals for the site to demonstrate that they conserve those elements that contribute to their significance and setting.

The options report make an assumption that there will be no adverse impact on the listed building provided that there is an appropriate boundary treatment. This is contrary to the NPPF, which requires that there is a need to sustain and enhance the significance and setting of a heritage asset that is affected by a development proposal and this should be informed by identification and assessment of the significance (including setting) that may be affected (para 129). Therefore, this section should be amended accordingly.

There is a need for development to be sensitively designed so that it will have a positive impact on the setting of the farmhouse. Reference should also be made to minimising the harm to the significance of the building. This lack of information means that there is no evidence to determine whether some of the site is developable without unacceptable impact on the significance of the adjacent heritage asset. It is advised that a heritage impact assessment be undertaken prior to a site being allocated for development.

The Plan needs to be amended to recognise the need for development to minimise the harm to the significance of the historic environment. The Plan should also make it clear that a heritage impact assessment needs to be undertaken and without such information, it cannot be demonstrated that the site is developable without unacceptable impact on the historic environment, and this may put a risk to the development of the site.

English Heritage agreed that if the Council undertakes a heritage impact assessment...
and expanded on the potential impact and mitigation relating to the heritage assets close to the proposed sites in the document, they would withdraw their objection. A heritage impact assessment has been undertaken in co-operation with English Heritage and they agree that mitigation will secure an acceptable relationship between development on the proposed site and Cowling Farmhouse. New text has been added to the Cowling Farm section of the Proposed Allocation Document in order to satisfy the points raised. On 21 August 2014 English Heritage confirmed "English Heritage welcomes the approach taken on the sites and broadly accepts the conclusions and proposed mitigation measures in the heritage impact assessment (to be included within the Appendix of the Sustainability Appraisal), as well as the amendments to the Plan itself. In view of the above, English Heritage wish to withdraw their objection to these matters with regards the soundness of the Plan".
We disagree with the SA comments which state that the only identified negative environmental effects in developing the site will be on greenfield designation. There is no mention of the negative impact on a heritage asset.

Additional comments are included in the Sustainability Assessment in the Proposed Allocation Document to recognise the proximity to the listed building and to ensure a positive approach is taken to the historic environment. On 21 August 2014 English Heritage confirmed “English Heritage welcomes the approach taken on the sites and broadly accepts the conclusions and proposed mitigation measures in the heritage impact assessment (to be included within the Appendix of the Sustainability Appraisal), as well as the amendments to the Plan itself. In view of the above, English Heritage wish to withdraw their objection to these matters with regards the soundness of the Plan”.

Councils response
The Highways Agency supports the location of Gypsy and Travellers sites close to essential services, amenities and with good transport links in order to provide employment opportunities and to reduce the need to travel by private car. We therefore welcome the objectives in the SA Supplement which covers this issue.

With regard to sites for the Gypsy and Traveller community identified as suitable in the Preferred Options document, we have an interest in sites that have the potential to have a material impact on the Strategic Road Network. We would therefore comment on the following three sites which are in close proximity to the M61 motorway: Site 1 - Cowling Farm, Site 6: Northgate Drive and Site 9 - Hut Lane.

The above sites and indeed any site that may impact on the strategic road network would need to be agreed with the Agency as part of the planning process. We would wish to place conditions on any such application to protect the integrity and stability of the strategic road network. We were consulted on the planning application in May last year for the site at Hut Lane, Heath Charnock where we directed conditions to be attached to any planning permission granted.

Overall we consider the document to be sound.

The Highways Agency will be consulted on any planning application for Gypsy and Traveller provision.
Support noted. Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.
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<th>Title:</th>
<th>Mrs</th>
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<th>Last Name:</th>
<th>Crouch</th>
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<td>Site/location</td>
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<td>Councils response</td>
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I write to you on behalf of businesses and the settled community in Cowling Brow, Weavers Brow and Limbrick about a letter you have sent dated 4th June 2014 which mentions that the Council’s preferred location for the provision of a minimum of 5 permanent Gypsy and Traveller pitches is on land at Cowling Farm. Your communication was sent to only a very small number of people. Only one of the fifteen houses on the Flag Lane development received your letter. The vast majority of the local settled community did not receive a copy of your letter nor did, amongst others, businesses at Moorland Gate Business Park, the owner of the business park or the landlord and owners of The Spinners pub. The vast majority have therefore only become aware of the Council’s proposals and the preferred location through serendipity and word of mouth.

We have carefully reviewed the Chorley Local Plan 2012-26 Gypsy and Traveller and Travelling Showpeople Preferred Options Statement of Consultation Supplement, Regulation 22 (1) (C) Report. Our view is that the consultations carried out have been inadequate and are a breach of the Localism Act 2011 which requires Councils to both notify and consult local communities in respect of this type of development before publishing proposals. The Governments Planning Policy for Traveller Sites also states that Councils need to pay particular attention to early and effective engagement with, among others, local business and the settled community in assembling a robust evidence base necessary to support their proposals. Records of Local Development Advisory Committee meetings show that this issue has been under discussion for a number of years and neither local businesses nor the settled community in the vicinity of one of the main locations under consideration has been invited to participate. This is evidence of non-engagement which, together with publication of documentation and the publication of a preferred location before proper local consultation, is in our view both a breach of the Localism Act 2011 and of Government Policy. The Act also states that thereafter the proposals must be publicised ‘…in such a manner as the Council reasonably considers is likely to bring the proposals to the attention of a majority of the persons who live at, or otherwise occupy, premises in the vicinity of the land...’ (Localism Act 2011: Requirements to carry out Pre Application Consultation, section 2). There is no evidence that your actions have met this important requirement.

The Localism Act 2011 also provides for local communities to have genuine opportunities to influence the future of the place where they live and provides the right for communities to draw up a Neighbourhood Plan. The Act provides the legal right for residents, employees and businesses to come together to have a major influence on where new developments should go and what form they should take. There is no evidence in any of the Council’s documentation that these aspects of the Act have been considered.

I have been mandated to ask the Council to urgently comply with the 2011 Act and the Government’s Planning Policy for Traveller Sites by redrafting its evidence base through formal notifications and discussions involving local businesses and those in the settled community in the vicinity of the preferred location. I therefore ask you to
confirm that your stated deadline for the receipt of views on the proposals of 16th July will be postponed to allow time for both a redrafting of the Preferred Options document and a formal review of the preferred location outcome.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response
The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Information on sites for development has been gathered from various sources over a number of years:
- The first call for sites was carried out by Chorley Council for a six week period in September/October 2005.
- The second was carried out jointly with Preston and South Ribble Councils for a six week period in July/August 2007. Landowners and developers were invited to put forward land for consideration for development.
- A further community survey relating to site suggestions ended on the 26th January 2010. The intention of this exercise was to ascertain whether the community felt that there were sites that would be particularly suitable for non-built development e.g. sport and recreation or conversely be protected from changes of use. After this deadline the Council continued to accept other site suggestions.
- The January 2010 community survey consultation resulted in a site for travelling Showpeople being suggested at Yarrow Bridge. This is one site now out for consultation.
- The Issues and Options Discussion paper brought together results of the ‘call for sites’ exercise and was the first proposals stage of the Site Allocation and Policies paper (now Chorley Local Plan). Consultation ran from December 2010 until February 2011.
Following the above the Local Plan went through further stages:

- The Preferred Option consultation on the Site Allocation and Development Management Policies ran from 16 September 2011 and was originally planned to end on the 28 October 2011 however this was extended by three weeks to the 18 November 2011 due to the amount of public interest it generated.
- The Publication deposit stage of the Chorley Local Plan 2012-2026 (previously referred to as the Site Allocation and Development Management Policies Development Plan Document) ran from 19 October 2012 for six weeks to 30 November 2012.
- The Local Plan was submitted to the Planning Inspectorate in December 2012 and the Examination was held in April 2013.

Furthermore the Council undertook consultation with Gypsy, Traveller and Travelling Showpeople themselves and engagement with relevant stakeholders and Chorley’s temporary Traveller and permanent residents as part of the Central Lancashire Gypsy and Traveller Accommodation Assessment (GTAA - summer 2013 and still ongoing). Gypsy and Traveller and Travelling Showpeople Assessment (GTAA) matters have been reported to the Central Lancashire Joint Advisory Committee over a number of years. All the above Local Plan stages have also been reported to Chorley’s Executive Cabinet as part of the plan making process and on-going consultation. Elected members have endorsed this approach at Full Council.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Localism Act also introduced a new right for communities to draw up a neighbourhood plan. Provided a neighbourhood development plan or order is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and with other legal requirements, local people will be able to vote on it in a referendum. If the plan is approved by a majority of those who vote, then the local authority will bring it into force.

The Preferred Options Consultation could not be put on hold as the Council endorsed the approach and documents at Full Council on 3 June 2014 for 6 weeks consultation. The Council is required to follow the Local Plan Inspector’s timetable and progress the Chorley Local Plan to adoption.
Independent report on the suitability of the assessment carried out by Chorley Council and the development of the preferred option submitted (FULL REPORT ON FILE). It presents a review of the case made by Chorley Council and discusses the validity of the selection process. The preferred option cannot be justified due to numerous inconsistencies, errors and lack of consistency in the examination of the nine sites. Often, points which have led to rejection of one site are not repeated in the assessment of other sites, which are thus deemed suitable for adoption. Attention to detail appears scant leaving the reader somewhat confused as to whether the “Preferred Option” was chosen at the start of the process and the document produced to attempt to verify the Council’s original choice. Maybe this is a consequence of seeking UK Government funding for any development scheme.

The “Preferred Option” chosen does not stand up to scrutiny on any Professional Standards. My report reaches a number of conclusions, as well as making recommendations on the way forward. Throughout the Council’s report there are acknowledged omissions in the extent of the assessment work completed to date. It is vital that work by Lancashire County Council Highways and United Utilities is commenced with due haste.

In summary, my report recommendations are as follows:
1. Adopt the Yarrow Bridge Depot site as the Preferred Option.
2. Land at Ackhurst Road, Chorley, is the fall back option if, in the unlikely situation, insurmountable problems arise with the Yarrow Bridge Depot site.
3. Identify total number of pitches which CBC needs to provide.
4. Involve the Settled Community in the detailed development of the Preferred Option.

In conclusion, I recommend that Chorley Council do what they are paid to do on behalf of the Settled Community ratepayers, namely talk to us about how the present situation is resolved. I note that a number of Local Authorities in England have got themselves in a similar mess and that Stockton Council has even called a halt to proceedings pending agreement on the way forward. We ratepayers are here to help. Why not ask us to help?

The footpath opposite The Spinners is impassable due to the hedge. Another nail in your preferred option.
The approach to site selection is set out in detail in section 5 of the preferred options document. The approach is consistent with the approach to all site Allocation in the Chorley Local Plan 2012-26 and is considered to be compliant with the Framework, Planning Policy for Traveller Sites, and key policies in the adopted Core Strategy, namely Policy 1 - Locating Growth and Policy 8 - Gypsy and Traveller and Travelling Showpeople Accommodation.

National Planning Practice Guidance states “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.” The SA scoring is not weighted as it is not considered that some indicators have more importance. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding Allocation. A number of other factors such as deliverability need to be taken into consideration.

The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report.

Further analysis of the merits of each site has been undertaken (see section 8 of the Proposed Allocation document). This has considered the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.

The Council has also examined sites put forward by the Gypsy and Traveller community as identified at Appendix 2 of the Preferred Options Document. All are in private ownership therefore the Council has no control over the land and cannot ensure deliverability; a number have been granted planning permission; a number are in the Green Belt and are deemed inappropriate development in the Framework and Planning Policy for Traveller Sites; and a number lie within a high risk flood zone. The Council endeavoured to find the location of all sites identified but were not able to identify the exact location of one site as not enough information or exact site details were provided by the gypsy and traveller community despite providing plans of the borough and having a meeting. The Council has assessed land in its ownership, over which it has control and therefore can ensure deliverability. The Council has also asked other stakeholders with major landholdings whether they have any suitable land available and they have confirmed that they do not have any suitable sites. In addition the Council has looked at sites suggested through its "call for sites" for the Local Plan in 2005 and 2007. Yarrow Bridge and Westhoughton Road have been included as they are previously developed sites in the Green Belt. The Hut Lane site has been included because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller
sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

• The land is owned by the Council and is deliverable and developable
• A dedicated access is achievable
• The land is within the settlement of Chorley and accessible to services and facilities
• It has the potential to meet the needs of the existing Traveller community at Hut Lane
• The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• It is sustainable, scoring B and would be compliant with the Core Strategy key policies
• The land is allocated for housing and employment, therefore the principal of housing development is established

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Land at Ackhurst Road has been considered and discounted as it currently serves the parking needs of this employment area.
Title: Mrs  First Name: Debra  Last Name: Platt  Organisation: Astley Village Parish Council

Site/location

1. Cowling Farm

Paragraph/section

Modification

1: Evidence why available/suitable/achievable?

2: Agree with preferred site?  Yes

3: Comments on document

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared?  □

5(2): Not justified?  □

5(3): Not effective?  □

5(4): Not consistent with national policy?

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?  No

9: Reason participation necessary

Councils response

Support noted. Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.
**Title:** Mrs  
**First Name:** Janice  
**Last Name:** Walkden  
**Organisation:**

**Site/location**

1. Cowling Farm

**Paragraph/section**

**Modification**

1: Evidence why available/suitable/achievable?  
No

2: Agree with preferred site?  
As far as I am aware, this proposed site is also part of the Green Belt. It would be folly to go to the expense and trouble to move or try to move the Travellers from one Green Belt site (which is already equipped and has road access etc.) to another site on Green Belt land. Surely it would make more sense to change the status of the land which the Travellers currently own and occupy rather than changing another piece of Green Belt land status and have the extra expense and effort. Unless of course this new proposed site is for other Travellers to occupy.

4(1): Legally compliant?  
No

4(2): Sound?

5(1): Not positively prepared?  

5(2): Not justified?  

5(3): Not effective?  

5(4): Not consistent with national policy?  

6: Reasons not legally compliant/unsound  
Because it would be using Green Belt land for access and therefore defeats the objective.

7: Necessary changes  
The proposed site would need to be taken out of Green Belt status, surely if this can be done here it could be done at the Hut Lane site.

8: Participate in examination?  
No

9: Reason participation necessary

**Councils response**

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council's proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Significantly, Hut Lane is a greenfield site in the Green Belt, whereas Yarrow Bridge is a previously developed site in the Green Belt. National Government Guidance - 'Planning for Traveller Sites' - states that Green Belt boundaries should be altered only in exceptional circumstances. However, there is a presumption in favour of sustainable development on previously developed land in the Green Belt subject to a number of criteria set out in Chorley Local Plan 2012-26 Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt.

In addition, Hut Lane scores Band D under the sustainability appraisal, making it the least sustainable of all the sites assessed. Yarrow Bridge scores Band B.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by
the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. This figure is largely based on the needs of the existing Traveller community at Hut Lane. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.
Site/location
1. Cowling Farm

Paragraph/section
Modification
1: Evidence why available/suitable/achievable?
2: Agree with preferred site?
No
3: Comments on document
Based on information available this is also situated in Green Belt land. Therefore if the Council considers this to be a viable site location then they must have the means to change its status from Green Belt to facilitate development. If this is the case then why not allow the Hut Lane site to have the same status change for it to become a recognised Travellers site.

4(1): Legally compliant?
No
4(2): Sound?

5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? ✔

6: Reasons not legally compliant/unsound
Because the access proposed is through Green Belt land and therefore defeats the proposed objective.

7: Necessary changes
As previously highlighted, if the status of a site proposed by the Council can be changed in its status from Green Belt to allow a site to be developed then why incur extra expense of putting in all access and facilities at a new location when all of this is in place at Hut Lane already. Simple solution is always the best policy, go forward and allow Hut Lane to be changed in its land status.

8: Participate in examination?
No

9: Reason participation necessary
Councils response
The access to the proposed Gypsy and Traveller site has yet to be finalised.
Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt
location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access.

Although in the Green Belt, the Hut Lane site has been included in the Council's assessment because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites. A planning Inspector in May 2012 (Appeal Ref: APP/D2320/A11/2159688) confirmed the site is greenfield.

The Hut Lane site is not considered suitable for allocation primarily because it has a poor sustainability score - Band D - representing the least sustainable site considered. Hut Lane is located in the Green Belt and in accordance with national policy is discounted because there are no very special circumstances to warrant selection of a site in the Green Belt.
I am presenting my objections to the proposed Gypsy and Traveller site at Cowing Farm by letter because as a lay person I found the representation form to be overly complicated and extremely difficult to navigate. I have set out my objections below in response to the proposal.

‘Location in respect of proximity to services including GP and other health care provision, education facilities, shops and public transport as well as the overall need to reduce long distance travelling’.

- Already overstretched GP and hospital services will become less accessible for existing residents.
- Schools will be disrupted and overcrowded by transient children.
- There are very few shops and no Post Office in the area.
- Public transport is limited at best.
- The roads in this location already suffer in winter due to large transport vehicles and buses from the depot.

‘Suitable road access and sufficient space within the site for parking and turning of vehicles as well as the storage of equipment’.

- The road from the industrial estate already causes traffic issues due to the downhill bend from the left and bollards on the right when large vehicles are turning. The narrow canal bridge is already a dangerous bottle neck which would be made worse with extra traffic; accidents and damage to property have been frequent in the last few years. Any other access point from Cowling Road would constitute a significant danger if vehicles were stopping to turn.
- There is road calming on Cowling Brow but not Cowling Rd, the large number of goods transport vehicles already utilising the area would make extra traffic dangerous and cause congestion resulting in the need to spend vast amounts of Council funding to upgrade the local highways.
- Due to the road in the direction of Rivington being unsuitable for large vehicles most traffic is forced to travel in the same direction into Chorley, any extra significant addition to this would make the small local highways even more congested and dangerous.

'No unacceptable impact on the immediate surrounding areas and the wider landscape. '

- This is an area of beauty, popular with walkers and cyclists, the proposed site is at the gateway to Rivington and the Pennines.
- The area is recognised for its leisure facilities, there is a football pitch a cricket pitch and a scout camp next to the proposed site.

'Promote peaceful and integrated co-existence between the site and the local community. '

- In the guidance notes under b) Soundness under justified, paragraph 2 states that ‘Evidence of participation of the local community and others with a stake in the local area’ there seems to be no objective evidence of any participation or consultation of any kind with the local community especially those immediately bordering the
The proposed site.

- The potential for conflict between the Travellers and those engaged in sporting activities is high as residential dwellings are not normally placed adjacent to sports facilities.
- There is evidence from many other failed ventures of this kind that peaceful coexistence is extremely difficult between such diverse communities but this has been made much less likely in this situation as only one of the parties seems to have been consulted on their opinion in the matter, that party being in the minority but seemingly holding great sway over the decision making powers of the democratically elected Council.

Summary

The area has been sighted as one for the potential building of 158 houses; this type of development would follow the normal pattern of an expanding town and provide necessary housing, this level of increased population would necessitate a natural increase in associated local services, public transport and infrastructure improvements and prove value for money for the people of Chorley, the currently proposed plan would force people whose lifestyle and customs are alien to the surrounding population with the distinct possibility of an influx of large groups of transient others with no connection to or reason to respect the area in which they would be temporarily living.

If it is deemed necessary for this development to proceed it would seem that your own investigations have proven the alternative Yarrow Bridge site to be far more suitable in most respects other than the wishes of the few individuals who have the most to gain.

It is imperative for the legitimacy of this proposal that the Council explain in detail exactly what factors prevailed in the decision to favour the Cowling Farm site over the many others.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

- Already overstretched GP and hospital services will become less accessible for existing residents.
  Response: The site is allocated for a mix housing and employment. The Traveller site would be consistent with this allocation in that it will provide for a specific housing need. Service providers contributed to the process of allocation.
- Schools will be disrupted and overcrowded by transient children.
  Response: Lancashire County Council Education Department contributed to the process of allocation for housing and did not raise any such issues.
- There are very few shops and no Post Office in the area.
  Response: The site scores a Sustainability Assessment Band B and is therefore
considered sustainable in terms of proximity to a range of services and facilities.  
• Public transport is limited at best.  
Response: It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators.  
• The roads in this location already suffer in winter due to large transport vehicles and buses from the depot.  
• The road from the industrial estate already causes traffic issues due to the downhill bend from the left and bollards on the right when large vehicles are turning. The narrow canal bridge is already a dangerous bottle neck which would be made worse with extra traffic, accidents and damage to property have been frequent in the last few years. Any other access point from Cowling Road would constitute a significant danger if vehicles were stopping to turn.  
• There is road calming on Cowling Brow but not Cowling Rd, the large number of goods transport vehicles already utilising the area would make extra traffic dangerous and cause congestion resulting in the need to spend vast amounts of Council funding to upgrade the local highways.  
• Due to the road in the direction of Rivington being unsuitable for large vehicles most traffic is forced to travel in the same direction into Chorley, any extra significant addition to this would make the small local highways even more congested and dangerous.

Response: The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response The access to the proposed Gypsy and Traveller site has yet to be finalised. 
Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

'No unacceptable impact on the immediate surrounding areas and the wider landscape.'  
• This is an area of beauty, popular with walkers and cyclists, the proposed site is at the gateway to Rivington and the Pennines.
• The area is recognised for its leisure facilities, there is a football pitch a cricket pitch and a scout camp next to the proposed site.

Response: The land is allocated for housing and employment therefore the principle of development is established. It will not impact on the leisure facilities to the south of the allocation.

'Promote peaceful and integrated co-existence between the site and the local community.'

• In the guidance notes under b) Soundness under justified, paragraph 2 states that ‘Evidence of participation of the local community and others with a stake in the local area’ there seems to be no objective evidence of any participation or consultation of any kind with the local community especially those immediately bordering the proposed site.

Response: The Council has progressed this proposed allocation in full accordance with its Statement of Community Involvement. The volume of representations received demonstrates how 'engaged' the local community has been in this work. The Council is committed to ensuring community cohesion and will continue to work with the local community including the 'temporary' and permanent Traveller community and relevant stakeholders such as the police authority in respect of design and layout and community cohesion issues.

There is no proposal to allow an 'influx of transient others'. The proposal is for a permanent site of a minimum of 5 pitches to meet an identified need for Traveller accommodation.

Support for Yarrow Bridge is noted.

It is imperative for the legitimacy of this proposal that the Council explain in detail exactly what factors prevailed in the decision to favour the Cowling Farm site over the many others.

Response: The Preferred Options report provides a detailed assessment of all the sites and demonstrates that Cowling Farm is a 'reasonable' choice when considered against all the alternatives. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council's proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.
I am presenting my objections to the proposed Gypsy and Traveller site at Cowing Farm by letter because as a lay person I found the representation form to be overly complicated and extremely difficult to navigate. I have set out my objections below in response to the proposal.

‘Location in respect of proximity to services including GP and other health care provision, education facilities, shops and public transport as well as the overall need to reduce long distance travelling’.
- Already overstretched GP and hospital services will become less accessible for existing residents.
- Schools will be disrupted and overcrowded by transient children.
- There are very few shops and no Post Office in the area.
- Public transport is limited at best.
- The roads in this location already suffer in winter due to large transport vehicles and buses from the depot.

‘Suitable road access and sufficient space within the site for parking and turning of vehicles as well as the storage of equipment’.
- The road from the industrial estate already causes traffic issues due to the downhill bend from the left and bollards on the right when large vehicles are turning. The narrow canal bridge is already a dangerous bottle neck which would be made worse with extra traffic, accidents and damage to property have been frequent in the last few years. Any other access point from Cowling Road would constitute a significant danger if vehicles were stopping to turn.
- There is road calming on Cowling Brow but not Cowling Rd, the large number of goods transport vehicles already utilising the area would make extra traffic dangerous and cause congestion resulting in the need to spend vast amounts of Council funding to upgrade the local highways.
- Due to the road in the direction of Rivington being unsuitable for large vehicles most traffic is forced to travel in the same direction into Chorley, any extra significant addition to this would make the small local highways even more congested and dangerous.

'No unacceptable impact on the immediate surrounding areas and the wider landscape.'
- This is an area of beauty, popular with walkers and cyclists, the proposed site is at the gateway to Rivington and the Pennines.
- The area is recognised for its leisure facilities, there is a football pitch a cricket pitch and a scout camp next to the proposed site.

'Promote peaceful and integrated co-existence between the site and the local community.'
- In the guidance notes under b) Soundness under justified, paragraph 2 states that ‘Evidence of participation of the local community and others with a stake in the local area’ there seems to be no objective evidence of any participation or consultation of any kind with the local community especially those immediately bordering the
proposed site.
• The potential for conflict between the Travellers and those engaged in sporting activities is high as residential dwellings are not normally placed adjacent to sports facilities.
• There is evidence from many other failed ventures of this kind that peaceful co-existence is extremely difficult between such diverse communities but this has been made much less likely in this situation as only one of the parties seems to have been consulted on their opinion in the matter, that party being in the minority but seemingly holding great sway over the decision making powers of the democratically elected Council.

Summary
The area has been sighted as one for the potential building of 158 houses; this type of development would follow the normal pattern of an expanding town and provide necessary housing, this level of increased population would necessitate a natural increase in associated local services, public transport and infrastructure improvements and prove value for money for the people of Chorley, the currently proposed plan would force people whose lifestyle and customs are alien to the surrounding population with the distinct possibility of an influx of large groups of transient others with no connection to or reason to respect the area in which they would be temporarily living.

If it is deemed necessary for this development to proceed it would seem that your own investigations have proven the alternative Yarrow Bridge site to be far more suitable in most respects other than the wishes of the few individuals who have the most to gain.

It is imperative for the legitimacy of this proposal that the Council explain in detail exactly what factors prevailed in the decision to favour the Cowling Farm site over the many others.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

• Already overstretched GP and hospital services will become less accessible for existing residents.
The site is allocated for a mix housing and employment. The Traveller site would be consistent with this allocation in that it will provide for a specific housing need. Service providers contributed to the process of allocation.

• Schools will be disrupted and overcrowded by transient children.
Lancashire County Council Education Department contributed to the process of allocation for housing and did not raise any such issues.
There are very few shops and no Post Office in the area. The site scores a Sustainability Assessment Band B and is therefore considered sustainable in terms of proximity to a range of services and facilities.

Public transport is limited at best. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators.

The roads in this location already suffer in winter due to large transport vehicles and buses from the depot. The road from the industrial estate already causes traffic issues due to the downhill bend from the left and bollards on the right when large vehicles are turning. The narrow canal bridge is already a dangerous bottleneck which would be made worse with extra traffic, accidents and damage to property have been frequent in the last few years. Any other access point from Cowling Road would constitute a significant danger if vehicles were stopping to turn.

There is road calming on Cowling Brow but not Cowling Rd, the large number of goods transport vehicles already utilising the area would make extra traffic dangerous and cause congestion resulting in the need to spend vast amounts of Council funding to upgrade the local highways.

Due to the road in the direction of Rivington being unsuitable for large vehicles, most traffic is forced to travel in the same direction into Chorley, any extra significant addition to this would make the small local highways even more congested and dangerous.

Response: The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access.

'No unacceptable impact on the immediate surrounding areas and the wider landscape.'

This is an area of beauty, popular with walkers and cyclists, the proposed site is at the gateway to Rivington and the Pennines.

The area is recognised for its leisure facilities, there is a football pitch a cricket pitch and a scout camp next to the proposed site.
Response: The land is allocated for housing and employment therefore the principal of development is established. It will not impact on the leisure facilities to the south of the allocation.

'Promote peaceful and integrated co-existence between the site and the local community.'

In the guidance notes under b) Soundness under justified, paragraph 2 states that ‘Evidence of participation of the local community and others with a stake in the local area’ there seems to be no objective evidence of any participation or consultation of any kind with the local community especially those immediately bordering the proposed site.

Response: The Council has progressed this proposed allocation in full accordance with its Statement of Community Involvement. The volume of representations received demonstrates how 'engaged' the local community has been in this work. The Council is committed to ensuring community cohesion and will continue to work with the local community and relevant stakeholders such as the police authority in respect of design and layout and community cohesion issues.

There is no proposal to allow an 'influx of transient others'. The proposal is for a permanent site of a minimum of 5 pitches to meet an identified need for Traveller accommodation.

Support for Yarrow Bridge is noted.

It is imperative for the legitimacy of this proposal that the Council explain in detail exactly what factors prevailed in the decision to favour the Cowling Farm site over the many others.

Response: The Preferred Option report provide a detailed assessment of all the sites and demonstrates that Cowling Farm is a 'reasonable' choice when considered against all the alternatives. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.
I am absolutely against this proposal for a number of key reasons. As someone who has been directly affected by this proposal already (I have lost a house sale and had to pay a solicitors fee for an aborted sale) I am firstly disputing the way the Council have gone about this. We are all taxpayers whose hard earned contributions provide your budget yet the first that any residents knew about this proposal was when a letter came through our door on the 7th June. By this time I was 2 weeks away from completing the sale of my house. As soon as my buyers knew about the proposal they withdrew from the sale. I have that in writing.

Am I correct in assuming that detailed consultation should have taken place before any concrete proposals were presented to the settled community? As the interests of the settled community are paramount, communication on this issue seems to have been left to a late stage in the proceedings - very few residents seem to have been issued with a copy of the planning notification. Is this because you wish to avoid the number of adverse comments being received by the consultation deadline of July 16th? On matters as crucial as this the information process should be a transparent, fair and proper one.

In the letter which we received on 7th July you stated that the site would be used for a minimum of 5 pitches - The Cowling Action Group have asked on a number of occasions for clarification but you seem very reluctant to expand upon the maximum number of pitches or indeed the issue of transient Travellers. This is a crucial question which could have a potentially huge impact upon the existing community. If you are intending this to become a site which accommodates the transient Traveller population you are running the unacceptable risk that Travellers from across the North West could expand the site onto the adjacent land and we could end up with a huge site of Dale Farm proportions. The environmental damage and the social consequences caused by unauthorised encampment are well documented and have been witnessed on many Traveller invaded sites across the country. Are you going to advise the settled community as to how this issue will be dealt with? As a homeowner and long term resident are you going to protect me from the potential consequences of this proposal? I would like a direct answer to this question.

Cowling residents are the ones who have to live with the consequences of your decisions and you have a responsibility to consider the needs of all sections of the local population. The needs of one section of the population cannot be at the expense of another section of the population. We all have human rights which should be respected and it is not fair or just to sacrifice the welfare and rights of the existing residents upon the altar of current political directives. Rightly or wrongly some residents have already suffered stress and lost money as a result of this proposal. Are you going to compensate me for the losses I have already accrued? If I am, as a result of this proposal, unable to sell my house at market value (if at all) are you going to buy my house off me at market value? I have worked extremely hard over a 20 year teaching career to pay for my cottage, which has now potentially been rendered unsaleable. I would like a direct answer to this question.
In my opinion it is an improper use of tax payers money to use land like this for a Travellers site. From an overall perspective the choice of the Cowling Farm site as the preferred option seems quite difficult to justify if you examine the criteria of your own proposal in detail, given the attractiveness of some of the alternatives. The current Traveller population are already settled at the Hut Lane site and I imagine that it will cost a huge amount of money to move them and a huge amount of money to create access and amenities at Cowling Farm. As this land has always been designated for light industry and housing I am very confused as to your intention for this land. Your proposal states that you are considering sites suitable for mixed residential and business use wherever possible. Is this statement not somewhat of an anomaly? Situating Travellers here will result in a significant loss in value of the existing land asset. It is unlikely that best market prices will be achieved in the vicinity of a Travellers site. Local companies may consider this to be a major obstacle to expansion, development and employment opportunities in this area. Is this a sensible and logical use of a land asset? I would like a direct answer to this question.

I am in any case against any development of Cowling Farm. It is a beautiful place and the gateway to the West Pennine Moors. On an emotional level it is heart breaking to contemplate the damage that this proposal will do to the rural character of the area. For those of us who live here, Cowling Farm provides a peaceful sanctuary from the stress of busy working lives. On a practical level, it will undoubtedly promote the ruination of our gateway to the West Pennine Moors and the effect this will have on the character and charm of this area will be irreversible and devastating. You are actually proposing to manipulate and annexe Green Belt for the designated access to the site. You state that you need to protect Green Belt from inappropriate development and strictly limit new Travellers sites in the open countryside away from existing settlements or outside areas allocated in the Local Plan. A number of sites being considered in your proposal will impact on Green Belt land and with regards to Cowling Farm the unnecessary development of an access road on our Green Belt land is unacceptable and should not be allowed.

This area is a rural area and the roads are a reflection of this. They are narrow, winding roads and they are already significantly overburdened. You have already had to introduce traffic calming measures here. As a resident here I can testify that this road is busier now than it has ever been. We have people constantly driving through to Adlington and Horwich. In the summer it is like a motorbike race track and on top of that we have tractors and lorries using this road. There have been a number of fatalities on this road and in my opinion it is sheer insanity to even consider development up here. To have caravans coming and going would constitute a major and unacceptable health and safety risk to all residents and would impact considerably upon our quality of life here. The resulting congestion, noise and chaos would be very difficult to live with. We have invested in property here and it is us, not you who will have to face the consequences of such inconsiderate and erroneous planning decisions. My concern is so great that I feel I must bring this letter to the attention of the Interim Executive Director for Environment at County Hall, Preston.

In summary, I do not think that this proposal should be passed for all the reasons listed above. I think the impact on the area itself, its residents and its local businesses would be devastating. I hope that all of you at Chorley Council will understand and appreciate the effect this would have on us all and vote accordingly. Please ask yourselves the question what if it was your area, your property and your life investment - how would you feel?

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared?  

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The Council's Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley local Plan 2012-2026.

Information on sites for development has been gathered from various sources over a number of years:
- The first call for sites was carried out by Chorley Council for a six week period in September/October 2005.
- The second was carried out jointly with Preston and South Ribble Councils for a six week period in July/August 2007. Landowners and developers were invited to put forward land for consideration for development.
- A further community survey relating to site suggestions ended on the 26th January 2010. The intention of this exercise was to ascertain whether the community felt that there were sites that would be particularly suitable for non-built development e.g. sport and recreation or conversely be protected from changes of use. After this deadline the Council continued to accept other site suggestions.
- The January 2010 community survey consultation resulted in a site for travelling Showpeople being suggested at Yarrow Bridge. This is one site now out for consultation.
- The Issues and Options Discussion paper brought together results of the ‘call for sites’ exercise and was the first proposals stage of the Site Allocation and Policies paper (now Chorley Local Plan). Consultation ran from December 2010 until February 2011.

Following the above the Local Plan went through further stages:
- The Preferred Option consultation on the Site Allocation and Development Management Policies ran from 16 September 2011 and was originally planned to end on the 28 October 2011 however this was extended by three weeks to the 18 November 2011 due to the amount of public interest it generated.
- The Publication deposit stage of the Chorley Local Plan 2012-2026 (previously referred to as the Site Allocation and Development Management Policies Development Plan Document) ran from 19 October 2012 for six weeks to 30 November 2012.
• The Local Plan was submitted to the Planning Inspectorate in December 2012 and the Examination was held in April 2013.

Furthermore the Council undertook consultation with Gypsy, Traveller and Travelling Showpeople themselves and engagement with Chorley’s temporary residents as part of the Central Lancashire Gypsy and Traveller Accommodation Assessment (GTAA - summer 2013 and still ongoing).

Gypsy and Traveller and Travelling Showpeople Assessment (GTAA) matters have been reported to the Central Lancashire Joint Advisory Committee over a number of years. All the above Local Plan stages have also been reported to Chorley’s Executive Cabinet as part of the plan making process and on-going consultation. Elected members have endorsed this approach at Full Council.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The Council considers that actual or perceived impact on property value is not a material planning consideration.

Cowling Farm is considered the most reasonable site when considered against the alternatives (see section 8 of the Proposed Allocation document). This is because:
• The land is owned by the Council and is deliverable and developable
• A dedicated access is achievable
• The land is within the settlement of Chorley and accessible to services and facilities
• It has the potential to meet the needs of the existing Traveller community at Hut Lane
• The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• It is sustainable, scoring B and would be compliant with the Core Strategy key policies
• The land is allocated for housing and employment, therefore the principal of housing development is established

The detailed cost information has been updated and included at Appendix 5 of the Proposed Allocation document. All estimates are exclusive of Vat and no allowance has been made for payment of professional fees, planning application fees, associated costs for surveys and site investigations, developers profit, project management fees, contingencies etc. As with any site allocated for development it is the developer that will be faced with the cost of development. In this regard, the Council as landowner is the likely developer. Funding may be available from the Homes and Communities Agency.

There are a number of planning policies that seek to protect landscape amenity and these will be complied with in any detailed planning application.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although
there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access.
Although the Yarrow Bridge site is nearer to where we live, it has obvious advantages over your preferred site at Cowling Farm. I have no knowledge of the other seven sites. The world and his dog knows your preferred choice is uncontainable and would be impossible to police. The kindest perceived reason for the Council’s preferred choice is ridiculous naivety.

The area of the site offered should match our obligations as a Borough.

More Green Belt will be used in making the road into Cowling Farm than in using the Yarrow Bridge Depot.

Support for Yarrow Bridge site is noted.
As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken.
by Lancashire County Council. Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access.
Title: Mr
First Name: Michael
Last Name: Vincent
Organisation: 

Site/location
1. Cowling Farm

Paragraph/section

Modification

1: Evidence why available/suitable/achievable? No

2: Agree with preferred site? No

3: Comments on document This site will be having a road access developed straight through the middle of Green Belt which is no different from the site at Hut Lane where the Romany Gypsies presently live. This would cause disruption to the Green Belt, whereas the site at Hut Lane does not affect boundaries or disrupt Green Belt.

Also there would be safety issues developing a site so close to affordable and other housing due to be developed on this site.

4(1): Legally compliant? No

5: Not positively prepared? No

5(2): Not justified? No

5(3): Not effective? No

5(4): Not consistent with national policy? Yes

6: Reasons not legally compliant/unsound Using Green Belt land for access.

7: Necessary changes The land would need to be taken out of Green Belt, this could all be done at the Hut Lane site, alleviating any further issues of community engagement and discrimination towards Gypsies and Travellers.

8: Participate in examination? Yes

9: Reason participation necessary This is a very serious issue after Councils have refused permission on other Green Belt sites.

Councils response The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are ‘not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt’. These include ‘local transport infrastructure which can demonstrate a requirement for a Green Belt
In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access. Planning policies including the preparation of a masterplan to deliver the housing and employment in accordance with this mixed-use allocation and the planning application process will mitigate against 'safety issues'
With regard to the Councils preferred option of Cowling Farm site I wish to lodge my strong objection. I have read your proposals and have come to the conclusion that the preferred option recommendation of Cowling Farm is illegal and unsound.

The Green Belt land proposed for access to Cowling Farm is subject to a restrictive covenant that would prevent the use of this land for access. Access from the south of the land would involve an access road to the back of Cowling Farm. Once that is laid it could be open house for many Travellers to gain access. If this situation arises what contingency plans has the Council made and how will the site be policed - who will pick up the bill? A smaller more contained site would limit the number of pitches and would be easier to manage and less costly. I am concerned that no maximum level has been set for the number of pitches - the report states for a minimum of 5! We have recently had dealings with Travellers asking for directions to Cowling Farm.

Cowling Road is the main route from Chorley to Rivington the gateway to the West Pennines. The area is enjoyed by Chorley residents. The Gypsy site would be a visible impact on the beautiful surrounding countryside. Cowling Farm is a Grade II listed building and the Council should protect the setting of this building.

There are many other issues which should put Cowling right out of the picture. For example despite the Council putting in calming measures to slow speeding traffic this has not made any difference. Some motorists treat this area as though it is brands hatch and we have had a number of accidents, some of which have resulted in loss of life. There was an accident last week when a young motorbike rider lost control and went straight in the chevron sign at the foot of Flag Lane - he lost his toe. A few years ago a motorbike rider lost his life on the same bend. Adding more traffic to the area would be a disaster, especially in winter when the roads are treacherous and the Council does not clear Cowling Brow.

The reason for my main objection is the lack of consultation with the settled community. The residents of Flag Lane only found out about the proposals when my neighbour received a letter. He was the only person in Flag Lane notified.

This is not in compliance with the Localism Act 2011. This is a major issue with a large impact on the quality of our lives and finances. I have been told the sale of a house on Cowling Brow has fell through due to the proposed Gypsy site.

I believe The Council has been in regular contact with the Gypsies from Hut Lane and has asked for their preference of site. It seems to me that the Council are pulling out all stops to make sure these families are happy with their move and in the same instance has totally blanked the settled community and has shown no regard for their rights - this is discrimination against the local community.

4(1): Legally compliant? No
4(2): Sound? No
5(1): Not positively prepared? □
The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31 - 32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

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In cooperation with English Heritage, a heritage impact assessment has been undertaken. Mitigation will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026. The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning
applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Council considers that actual or perceived impact on property value is not a material planning consideration.

The Council has progressed this proposed allocation in full accordance with its Statement of Community Involvement. The volume of representations received demonstrates how 'engaged' the local community has been in this work. The Council is committed to ensuring community cohesion and will continue to work with the local community and relevant stakeholders such as the police authority in respect of design and layout and community cohesion issues.

The respondents to the Gypsy and Travellers Survey were asked if they felt being near to a range of facilities was important or not important to them. These survey results have been taken account of when assessing sites. In Chorley proximity to primary schools, secondary schools, doctors, post offices/cashpoint, public transport and main roads were considered most important.

In accordance with national guidance the needs of the existing Traveller community have been taken into consideration. They state that the extended family currently needs accommodation for 4-5 families, with further future growth. They would like a site which could accommodate two mobile homes, a further five touring caravans, a double utility block, room for parking, sitting outside, and a garden/play area for the children. In terms of location they would want to be in a location with a reasonably good environment (that is not next to recycling centres, sewerage treatment works etc.) They would want to avoid their children having to change schools. They would be content with most locations in and around Chorley Town, Adlington or Coppull. A key objective for them is to feel secure within their own site and for that reason they have a very strong preference for a site in their own ownership and control. The existing Gypsy and Traveller Community needs are summarised in the Proposed Allocation document (paras 7.10-7.13).
Title: Mrs Samantha Barclay

Organisation: Site/location: 1. Cowling Farm

Paragraph/section: Modification

1: Evidence why available/suitable/achievable?

2: Agree with preferred site?

3: Comments on document

I have been a resident in the area for over 12 years and was drawn to the beauty of Limbrick and its environs. The development I live on has had restrictions imposed on it in respect of street lighting and we have none on my lane so as to cause no ‘light pollution’. All new properties in the area have been built in a ‘traditional stone style’ once again to keep within the look and heritage of this area. This is one of the main reasons that I oppose your proposal to establish a site for the Gypsy/Traveller community at Cowling Farm. This will not be in keeping with its surroundings and will not enhance the local environment that attracts many thousands of people to visit the area.

Also, this site has been allocated for housing and employment in the emerging Local Plan. Using any part of this site for your proposal will diminish the value of the remaining site as no developer or business will want to create new homes/jobs beside one of these sites.

We hear on a daily basis that this country is desperately short of new homes and by making this site your number one option you are damaging the viability of the remainder of the site for any further development. Your number 2 option has far less impact of the Councils coffers, therefore making it a better option for you and us the Ratepayers. It has excellent access to Public transport and is nearer to the two schools that the families currently send their children to – this is not the case with Cowling Farm as there is only a bus twice a week!

As it is a Brownfield site and next to the A6 it will cost less to develop and it is also of a size that will limit any ‘visiting’ Gypsies. Access for caravans will be much easier and the site is well shielded from the main road. There will be no visual impact from the road as it is well screened.

In my opinion having the site at Cowling Farm will cause more problems than it solves, will be a nightmare to manage as, once you have created access to the site you may find that all transient Travellers may access it with ease.

I hear the plan is to build a high metal fence around the proposed site at Cowling – is this going to make that community feel integrated into ours or will it make them feel like prisoners on their site.

I hope you will consider these points when making your final decisions.
As stated the land is allocated for a mix of housing and employment in the Chorley Local Plan 2012-2026. Land for the Gypsy and Traveller site will be discounted from the allocated areas. This is acceptable because the Inspector (Dr Bussey -18 January 2014) stated "In principle I consider that the re-allocation of some existing housing and/or employment sites for Gypsy and Traveller purposes would be acceptable. Although this may have implications in relation to the need for updated evidence, consultation and SA" Support for Yarrow Bridge is noted. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

It is recognised that public transport is limited in the Cowling Brow area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:
• the land is owned by the Council and is deliverable and developable
• a dedicated access is achievable
• the land is within the settlement of Chorley and accessible to services and facilities
• it has the potential to meet the needs of the existing Traveller community at Hut Lane
• the site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• it is sustainable, scoring B and would be compliant with the Core Strategy key policies
• the land is allocated for housing and employment, therefore the principal of housing development is established
1: Evidence why available/ suitable/ achievable?

I do not believe that the site is suitable and achievable for Gypsy provision due to the factors set out in section 6. This evidence and information has been extracted from documents supplied by CBC primarily in response to FOI requests. This view is based on a number of inaccuracies, statements that could be misleading and inconsistencies contained within the restricted paper prepared by CBC planning team and submitted to the Councillors and considered at the CBC meeting of 3rd June (referred to as Part 2 paper). As there are a number of errors in this paper I believe that the recommendation to Councillors was unsound and therefore the preferred option has to be considered unsound.

2: Agree with preferred site?

No

3: Comments on document

I believe the Preferred Options document is significantly flawed because it does not consider the impact that using Cowling Farm site would have on the Cowling community for example in terms of destroying the Community Cohesion in the immediate area of Cowling Farm or the published Chorley Partnership Sustainable Community Strategy 2010-2020.

I believe that the Preferred Options document is unsound as the preferred option is not deliverable due to the lack of a suitable access due to the factors summarised in section 6.

4(1): Legally compliant?

No

4(2): Sound?

No

5(1): Not positively prepared?

✓

5(2): Not justified?

✓

5(3): Not effective?

✓

5(4): Not consistent with national policy?

✓

6: Reasons not legally compliant/unsound

After giving a great deal of consideration to the evidence available to us including the Preferred Option document, related public domain information and responses from the Council to FOI requests, it is the opinion of a number of Cowling residents and local business owners that the Preferred Option recommendation from officers is unsound.

We have reached this conclusion based to a number of factors which are summarised below and supported by further detail within the body of this submission.

1. There are inconsistencies between the basis for recommending Cowling Farm as the Preferred Option and the data included in the Sustainability Appraisal Matrix. For example, it is clear from your information that the sites at Yarrow Bridge Depot and Cabbage Hall Fields score more highly on 9 and 11 criteria respectively than the Cowling Farm site.

2. The preferred option document and the previously withheld recommendation provided in response to FOI 14 392 ('the Recommendation') confirms (paragraph 47) that the proposed access to Cowling Farm will be through Green Belt land off Cowling Road/Weavers Brow. This is contrary to the Green Belt policies outlined in paragraphs 22 and 23 of the Recommendation a fact that appears not to be considered in the
assessment and selection process. Furthermore, in recent responses to FOI requests, the Planning team have confirmed that the Green Belt land proposed for the access to Cowling Farm is subject to a restrictive covenant that would prevent use of this land for access. We therefore believe that the Cowling Farm site is not deliverable.

3. There are errors in the Sustainability Assessment Matrix that formed the body of the recommendation. For example the red banding of Yarrow Bridge Depot in relation to objective EC2 (pages 3 and 8 of this submission) is incorrect as confirmed by the Planning team at the 26th June meeting.

4. There has been a lack of a rigorous assessment of contributory factors that would impact the selection of a Preferred Option. For example there is yet to be a full assessment of Lancashire County Council highways concerns regarding access to the Cowling Farm site and you have confirmed that the only consultation to have taken place has been ‘high-level’.

5. There are gaps in information and assumptions contained in the publically available information i.e. the Preferred Options paper, the previously withheld recommendation provided in response to FOI 14 392 ('the Recommendation') and other supporting documents. For example the existence of ‘other factors’ as referred to in your email of 27th June 2014 that are part of the evidence base to support the recommendation of a Preferred Option. Despite a series of requests these other factors, if they in fact exist, have not been made publically available.

6. We believe there is a lack of recognition of and compliance with to the requirements of the Localism Act 2011 in the work undertaken.

7. There has been a lack of consultation with the settled community and lack of public visibility prior to and during the selection and recommendation of a Preferred Option.

8. From the publically available information due consideration of the Government’s planning policy for Traveller sites does not appear to have taken.

9. There appears not to be a master plan for the remaining land at Cowling Farm outside of that which would form part of the proposed Permanent Gypsy and Traveller site.

Whilst the above points are all evidenced, perhaps our greater concern is that it appears the Planning Team have not taken a holistic view when making the recommendation of a Preferred Option. We think this is best illustrated by the lack of a definite location for the proposed Permanent Gypsy site and factors such as access, topography, land designations, existing covenants and agreeing the master plan for Cowling Farm not being considered as a whole. Allocating 0.4Ha of a 9.5Ha site with a development that is likely to have an impact on the viability of the wider site for other uses, seems to be a poor use of land assets when there are two considerably smaller but adequately sized sustainable sites available at Yarrow Bridge Depot (0.63Ha) and Cabbage Hall Fields (0.6Ha).

As a result of the above factors, we conclude that the planning recommendation is unsound and therefore suggest that the decision by Council Members must also be considered unsound as this was made on the basis of inaccurate, incorrect and incomplete information provided by the Planning Team.

On this basis we request that the current consultation process is suspended and that the Planning Team consult with Council Members to agree how the selection of a Preferred Option for a Permanent Gypsy and Traveller site for Chorley can be
undertaken in a sound, open and inclusive way. We further propose that any Preferred Option generated by this review be independently validated prior to a recommendation being made to the Council members.

We are conscious that the action we are recommending would need the support of a number of parties including the Council Members and probably the appointed Inspector and we have therefore copied this submission to those parties.

The Cowling Action Group is made up of residents and business owners located in the Cowling area of Chorley. It has been set up to provide a framework structure in opposition to Chorley Council’s proposal to build a permanent Traveller site on the land known as Cowling farm.

Cowling farm is currently the preferred site of nine possible sites in the Chorley area and whilst we have nothing against the travelling community we believe that use of one of the many other proposed sites will have less impact on the surrounding areas both logistically and financially.

Access to Cowling Farm is not viable due to factors including appropriate land use, covenants applying to the land and road safety issues.

FULL REPRESENTATION AND SUPPORTING EVIDENCE ON FILE

7: Necessary changes
A full reassessment is required to make the assessment compliant. The Preferred Option document needs to be revised to identify a site that is suitable, deliverable and achievable.

8: Participate in examination?  No
9: Reason participation necessary
Councils response
National Planning Practice Guidance states “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.”

The SA scoring is not weighted as it is not considered that some indicators have more importance. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding allocations. A number of other factors such as deliverability need to be taken into consideration.

The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an
allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

In terms of inaccuracies in the evidence base or consultation documents, it is considered that the purpose of consultation is to allow an opportunity for such concerns to be brought to the attention of the Council, to enable the Council to correct such matters and reconsider the approach to &/or selection of a site. In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments. The Council has corrected the inaccurate distance for further/higher education in the Sustainability Appraisal for Yarrow Bridge, this does not affect the overall band of the site. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026. The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of
Community Involvement provides additional information on pre-application discussions. Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Council has taken into account the Planning Policy for Traveller Sites 2012 namely: The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The Council has looked at sites put forward by the Gypsy and Traveller community as identified at Appendix 2 of the Preferred Options Document. All are in private ownership therefore the Council has no control over the land and cannot ensure deliverability; a number have been granted planning permission; a number are in the Green Belt and are deemed inappropriate development in the Framework and Planning Policy for Traveller Sites; and a number lie within a high risk flood zone.

The Council has assessed 8 sites in its ownership and one of which is a preferred site for allocation therefore it did not need to explore the potential for rural exception sites. The Council has also asked other stakeholders with major landholdings whether they have any suitable land available and they have confirmed that they do not have any suitable sites. In addition the Council has looked at site suggested through its “call for sites” for the Local Plan in 2005 and 2007.

Although in the Green Belt, the Hut Lane site has been included in the Council’s assessment because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites. A planning inspector in May 2012 (Appeal Ref: APP/D2320/A11/2159688) confirmed the site is greenfield.

The Hut Lane site is not considered suitable for allocation primarily because it has a poor sustainability score - Band D - representing the least sustainable site considered. Hut Lane is located in the Green Belt and in accordance with national policy is discounted because there are no very special circumstances to warrant selection of a site in the Green Belt. (See Proposed Document Section 8, Site Information and Sustainability Appraisal).

The Central Lancashire Core Strategy contains Policy 8: Gypsy and Traveller and Travelling Showpeople Accommodation which provides criteria that should be applied to applications for any proposals for Gypsy and Traveller or Travelling showpeople sites. The Preferred Options document Appendix 1 contains Policy HS11 Gypsy and Traveller and Travelling Showpeople (MMEC57). At the detailed planning application stage all the relevant polices and guidance; both national and local will need to be complied with.

The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

• Community engagement between the settled and Traveller community.
• The masterplanning process.
• Highways options in relation to the delivery of the mixed use site.

The site is allocated for a mix of housing and employment in the Chorley Local Plan 2012-2026 so the principle of development is established and services can be provided. The site is within the settlement of Chorley.

The Cowling Farm site has an undulating topography, but is a far larger site that is flat in part and is not subject to the constraints that affect the other Chorley Town sites. The masterplanning process itself would ensure that residents are able to fully participate in the delivery of a Traveller site and the allocated housing and employment. Working with key stakeholders, including the local residences and businesses, the Travelling community and the police architectural liaison officer, an
appropriate access, location, design and layout could be arrived at. This process would contribute to a ‘cohesive’ community.

The Council has discounted the Cabbage Hall Fields site as a Gypsy and Traveller site because the site has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation. (See Proposed Document Section 8, Site Information and Sustainability Appraisal).

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. (See Proposed Document Section 8, Site Information and Sustainability Appraisal).

The local plan examination has been effectively suspended while the Council considers the allocation of a suitable site for a minimum of five pitches. As such, the formal stages for plan preparation are not restarted. The Council is following the direction and timetable set by the examining inspector.

The reasons for the report to Full Council on 3 June 2014 being a part 2 report were that firstly it contained personal information relating to the children of potential occupants of the site. Secondly the fact that a particular site could potentially be allocated might have had an effect on the value of neighbouring land. In the event that certain sites considered in the report were not approved by members for consultation there would be no public interest in this information being published. However consultation for all sites mentioned in the report was approved on 3 June which meant that the report could then be published. The Council released the part 2 report on 3rd July 2014 shortly after the Full Council meeting.
I wish to state the above proposal is both illegal and unsound.

The local planning authority have to work on robust evidence and engage and cooperate with both the travelling and settled community and local industry. The Localism Act of 2011 requires the Council to both notify and consult with local communities before publishing proposals. It appears to me that the planning department has gone out of its way not to consult with the settled community or local businesses and therefore what they are proposing is both illegal and unsound. The process should be stopped immediately to allow discussions with the local community.

Sites under consideration
I do not agree that the Cowling site should be the preferred option:-
1. It is one of the most expensive sites
2. It is a very valuable site and placing Gypsy pitches on this land would de-value it and the surrounding settlement
3. It would be difficult to get a developer to build houses as they would not be able to sell them at the normal market value.
4. It is difficult to compare the different sites that have been proposed as it is unclear how these have been marked.
5. The Council states the bus service is less than 1 per hour. In fact the bus service in each direction is 2 per week. Therefore, on average there is one bus in one direction every 84 hours.
6. Distance measurement used are questionable. As we have not been informed as to where the Gypsy site will be in the area and you have not stated where the access road will be – how can you state the distances are correct.

It appears your statements are flawed and inaccurate and therefore not sound. The Government policy is to use brown field sites as a priority not Green Field. The Council suggests using Green Belt for an access road from Cowling/Weavers Brow. This is also not Government policy. It would be hazardous to use an access on the Brow because there have been many accidents on this stretch of road. Many cyclists use this route to Rivington as well as motor cyclists and the weekends are very busy.

Another major concern is the size of the site which could attract many more Travellers than anticipated and we have seen no contingency policy to prevent this. We have seen no plan or recommendations as to how the site is to be policed and who is paying for it.

Local businesses will suffer. Two companies plan to leave the area if the Gypsy site gets the go-ahead. Further loss of employment in the area. Chorley Council should, like the Government, be endeavouring to promote business not hinder it.

In my opinion the lowest cost option for a Travellers site would be a smaller more manageable brown field site which the Gypsy community could police themselves.
The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist.

In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

Cowling Farm is the most expensive option, along with Harrison’s Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation document.

The site is allocated for a mix of housing and employment in the Chorley Local Plan 2012-2026 so the principle of development is established and services can be provided. The site is within the settlement of Chorley. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The Council considers that actual or perceived impact on property value is not a material planning consideration.
National Planning Practice Guidance states “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.” The SA scoring is not weighted as it is not considered that some indicators have more importance. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding Allocation. A number of other factors such as deliverability need to be taken into consideration.

The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report. Further analysis of the merits of each site has been undertaken. This has considered the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.

It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31-32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access.

The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County
The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.
It is with some concern that I write to you today regarding the above issues. I understand that an area to the rear of Cowling Farm is under consideration for the siting of a permanent caravan site. I feel that certain issues should be made abundantly clear regarding the unsuitability of this site.

1. This is a quiet rural area and no higher limit appears to have been set on the number of caravan pitches available on what is a quite large piece of valuable land.

2. My other concern is with the potential traffic issues, problems already exist on Cowling Brow and Long Lane, various traffic accidents have occurred over the last few years, including a recent fatality. More traffic will simply make this issue worse.

3. I understand that Cowling Farm is a listed building and as such carries historical significance. How can a listed building be ignored, I am sure if the owners of Cowling Farm wanted to tamper with its appearance Chorley Planning department/English Heritage would act immediately.

4. It is not clear where the access road to the proposed site would be located. The only logical way in is across other adjacent Green Belt land.

5. The proposed field is greatly undulating with many differing levels, surely the cost of constructing a suitable area with provision of power, water and sewerage contained within a hard standing area for caravans would cost a great deal of money. There must be other brownfield sites closer to Chorley town centre that already have services installed that are currently available.

6. In an era of national fiscal difficulties with budgets in all areas being reduced, how is this proposed plan in any way an efficient and well guided use of public money?

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared? □

5(2): Not justified? □

5(3): Not effective? □

5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by
the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of
ongoing research. A final Gypsy and Traveller and Travelling Showpeople
Accommodation Needs Assessment will inform definitive need figures which will be
progressed through a separate Gypsy and Traveller and Travelling Showpeople local
plan.

The access to the proposed Gypsy and Traveller site has yet to be finalised.
Lancashire County Council (LCC) Highways have provided an updated response (see
Proposed Site Allocation document -LCC Highway comments pages 31 -32). They
identify that there are three potential accesses to the site with access off Moorland
Gate being the preferred access route from a highways perspective. Moorland Gate is
an adopted public highway to the turning head end of the road and there is scope for
the sort of improvements that they would wish to see to enable access between the
site and local facilities on foot and by bus (for example a formal footway along the
eastern side of the road). Current access made off the road by the businesses served
off Moorland Gate would not be impeded by the projected use of the site, although
there would be an inevitable loss of on-street parking at the junction should a new
access be taken off Moorland Gate. Details of how the access will be designed, laid out
and constructed will be submitted as part of any future planning application for an
allocated site which is when more thorough highways assessments will be undertaken
by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not
inappropriate in the Green Belt provided they preserve the openness of the Green Belt
and do not conflict with the purpose of including land in the Green Belt'. These include
'local transport infrastructure which can demonstrate a requirement for a Green Belt
location.' In a case where access is required through the Green Belt, this would not
affect the openness of the Green Belt and the site would be wholly situated within an
area allocated for a mix of housing and employment use. However, in light of more
detailed comments from LCC Highways it is not necessary to pursue this access. The
Local Plan Inspector will need to be satisfied that an access can be achieved in
principle only. Details of how this access will be designed, laid out and constructed will
be submitted as part of any future planning application for an allocated site which is
when more thorough highways assessments will be undertaken by Lancashire County
Council.

Any proposed development needs to minimise harm to the significance of the historic
environment. The Cowling Farm site is located to the east of the existing curtilage to
Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment
has been undertaken which considers:

- The contribution that the Cowling Farm site makes to the significance of Cowling
  Farmhouse
- The impact that the loss of the Cowling Farm site and its subsequent development
  might have upon the significance of the Farmhouse
- How any harm might be removed or reduced
- The impact that the loss of this site and its subsequent development might have
  upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development
buffer zone and screen planting, will result in an acceptable relationship between
development on the proposed site and the designated heritage asset such that the
significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a
positive impact on the setting of Cowling Farmhouse. Applications for the
development of this site will be assessed against Policy 16 (Heritage Assets) in the
Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and
BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on
conserving and enhancing the historic environment in the National Planning Policy
Framework. An application will need to demonstrate an understanding of the
contribution of the site to the significance of Cowling Farmhouse, the impact of
developing the site upon it, and specifically how the proposed development will impact upon its setting.

The site is allocated for a mix of housing and employment in the Chorley Local Plan 2012-2026 so the principle of development is established and services can be provided. The site is within the settlement of Chorley. Cowling Farm is the most expensive option, along with Harrison’s Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation document.
Failure by the Council to follow a transparent, fair and proper process:
The local settled community does not see evidence of good practice in community
engagement in order to inform the identification and selection of locations. The
proposal is inconsistent and inaccurate in its appraisal of the various sites and does not
include any reasoned argument that supports the selection of Cowling Farm as the
preferred site. There is a body of evidence that suggests that the Council may well
have acted illegally. We do not see any evidence that the Council has taken the
Localism Act 2011 into account in its decision to identify a preferred site. Further the
Council is in breach of the Neighbourhood Planning (General) Regulations 2012 which
states that: ‘...before submitting a plan proposal to the local planning authority, a
qualifying body must .....publicise, in a manner that is likely to bring it to the attention
of people who live, work or carry out business in the neighbourhood areas.’ The
representation process appears to have been designed to discourage any participation
unless one is an IT expert.

Failure by the Council to produce a sound proposal:
The errors and inconsistencies in the Preferred Options document are manifest and
too numerous to list in total but examples are:
They state that parts of the Cowling site are relatively flat, ignoring the fact that most
of the site is sloping. The Yarrow Bridge site appears to be flat and largely hard
surfaced, ideal for mobile homes.
They state that the Cowling site is within close proximity to a small number of housing
and industrial units. It is in fact in close proximity to a significant number of houses, a
business park, two picturesque pubs, a scout campsite and vulnerable football and
cricket pitches and the 9.5ha Cowling Farm site is earmarked for housing and
employment allocation.
They state that the Cowling site has a bus service frequency of less than one per hour,
it in fact has an insignificant service on just 2 days per week.
In their appraisal the Council have stated that the Cowling site includes land suitable
for grazing - is this a requirement or just a give-away opening up the whole site to
official or unofficial use?
I cannot understand how the Cowling site is 1.6-3.2km away from further/higher
education whilst the Yarrow Bridge site is stated to be over 5km from such facilities
but is in fact almost within sight of two such schools. Similar errors are apparent in
other assessments relating to local facilities.
The crucial objection to the Yarrow Bridge site appears to be that it is Green Belt but
the Cowling proposal includes a requirement that the access road be removed from
the Green Belt and designated as part of the Gypsy and Traveller site. The area of land
so required is not quantified.

Improper use of taxpayers money and loss in value of existing land asset:
The proposal does not show any reasoning behind choosing the most expensive option
and has failed to take account of likely contingent and associated costs and loss of
income e.g. reduction or complete wipe out of the land value, possible loss of
employment and housing opportunities and likely enforcement costs should control of
the site be lost as has happened elsewhere.
Unacceptable manipulation/annexing of Green Belt designated land for site access:
Whilst Green Belt status seems to be a negative factor in relation to other sites its use for an access road is dismissed in the Cowling Farm appraisal.

Unacceptable risk that Gypsies from across the North West expand the site/adjacent land to Dale Farm proportions:
The Cowling Farm site is the largest by far and could be wide open to invasion regardless of fencing that might be installed. A much safer option would be a well-contained site that could not be significantly invaded and illegally enlarged.

Destruction of development and employment opportunities on Moorland Gate Business Park:
Had any proper consultation been carried out the Council would have been aware that the business activity at Moorland Gate Business Park would likely be diminished and any possibility of expansion severely compromised should the Cowling Farm site be chosen.

The Council’s lack of community and local business engagement, the continuing failure to publicise, the lack of stakeholder consultation, the flawed opportunities to comment, the failure to embrace the Localism Act 2011 and the flawed report are all parts of a growing body of evidence that the local settled community has been discriminated against.

These are the most serious of issues and I believe the Council should withdraw its Preferred Options document. The Council should then carry out a thorough external review of all the points I have mentioned and all actions carried out in relation to the Preferred Options document to ensure their legality. A revised schedule of deadlines should then be published to enable due process to be completed which reflects best practice.

4(1): Legally compliant?
No

4(2): Sound?

5(1): Not positively prepared?

5(2): Not justified?

5(3): Not effective?

5(4): Not consistent with national policy?

6: Reasons not legally compliant/unsound
See response to question 3.

7: Necessary changes
The Preferred Options document and the preparation process are so flawed, inaccurate and inconsistent that the process should be stopped and undertaken again in a proper manner.

8: Participate in examination?
No

9: Reason participation necessary

Councils response
The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are
added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Localism Act also introduced a new right for communities to draw up a neighbourhood plan. Provided a neighbourhood development plan or order is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and with other legal requirements, local people will be able to vote on it in a referendum. If the plan is approved by a majority of those who vote, then the local authority will bring it into force.

Comments in respect of inconsistencies are noted. The Cowling Farm site scores a Sustainability Assessment Band B and is therefore considered sustainable in terms of proximity to a range of services and facilities. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments. The Council has corrected the inaccurate distance for further/higher education in the Sustainability Appraisal for Yarrow Bridge, this does not affect the overall band of the site.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council's proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

The access to the proposed Gypsy and Traveller site has yet to be finalised.

Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new
access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm.

The Council considers that actual or perceived impact on property value and businesses is not a material consideration.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.
Title: Mrs  First Name: Sandra  Last Name: Devine  Organisation:

Site/location  1. Cowling Farm

Paragraph/section

Modification

1: Evidence why available/ suitable/ achievable?

2: Agree with preferred site?

No

3: Comments on document

The site will be having a road access developed straight through the middle of Green Belt which is no different from the site at Hut Lane where the Romany Gypsies presently live. This would cause disruption to Green Belt whereas the site at Hut Lane does not affect boundaries or disrupt Green Belt.

Also there would be safety issues developing a site so close to affordable and other housing due to be developed on this site.

4(1): Legally compliant?

No

4(2): Sound?

No

5(1): Not positively prepared?  ✓

5(2): Not justified?  

5(3): Not effective?  

5(4): Not consistent with national policy?  ✓

6: Reasons not legally compliant/unsound

1. Having to use Green Belt land for access.

2. The preferred options are put forward without reference to Planning Policy for Traveller Sites 2012. namely:

   a. Policy B: Planning for Traveller Sites. Paragraph 10 'Criteria should be set to guide land supply Allocation where there is identified need. Where there is no identified need, criteria based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of Travellers while respecting the interests of the settled community.'

   b. Policy D: Rural Exception Sites. Paragraph 13 'If there is a lack of affordable land to meet the Traveller needs, local planning authorities in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable Traveller sites, including using a rural exception site policy for Traveller sites that should also be used to manage applications. A rural exception site policy enables small sites to be used, specifically for affordable Traveller sites, in small rural communities, that would not normally be used for Traveller sites.'

   c. Policy E: Traveller Sites in Green Belt. Paragraph 15 '...If a local planning authority wishes to make an exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a Traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a Traveller site only.'

   d. Policy I: Implementation. Paragraph 29 'The implementation policies set out in the
National Planning Policy Framework will apply also to plan-making and decision-taking for Traveller sites. In applying those implementation provisions to Traveller sites, references in those provisions to policies in the National Planning Policy Framework should, where relevant, be read to include policies in this planning policy for Traveller sites.

In conclusion, as there is already a viable Traveller site at Hut Lane, which can be made legal by the implementation of the above mentioned paragraphs of the Planning Policy for Traveller Sites, no other site need be considered. The Hut Lane site already has road access and the required services. There is no financial commitment required from Chorley Borough Council and, as the site already benefits from temporary planning consent as a Traveller site, appears to be the only realistic option.

7: Necessary changes
See response to question 6.

8: Participate in examination?
Yes

9: Reason participation necessary
Chorley Borough Council have for many years refused to acknowledge their responsibility towards the Travelling community. The refusal to acknowledge or make reference to the Planning Policy for Traveller Sites has caused, for the families living at Hut Lane, unnecessary stress, financial loss and heartache. This is a very serious issue after Chorley Borough Council have refused permission on other Green Belt sites but which they now suddenly find able to grant consent for.

Councils response
The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31-32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The Council has taken into account the Planning Policy for Traveller Sites 2012 namely: The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople
Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The Council has looked at sites put forward by the Gypsy and Traveller community as identified at Appendix 2 of the Preferred Options Document. All are in private ownership therefore the Council has no control over the land and cannot ensure deliverability; a number have been granted planning permission; a number are in the Green Belt and are deemed inappropriate development in the Framework and Planning Policy for Traveller Sites; and a number lie within a high risk flood zone.

The Council has assessed 8 sites in its ownership and one of which is a preferred site for allocation therefore it did not need to explore the potential for rural exception sites. The Council has also asked other stakeholders with major landholdings whether they have any suitable land available and they have confirmed that they do not have any suitable sites. In addition the Council has looked at site suggested through its "call for sites" for the Local Plan in 2005 and 2007.

The Hut Lane site has been included because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites. A planning Inspector in May 2012 (Appeal Ref: APP/D2320/A11/2159688) confirmed the site is greenfield. The Hut Lane site is not considered suitable for allocation primarily because it has a poor sustainability score - Band D - representing the least sustainable site considered and because it is a greenfield site. The report provides the necessary detail to allow a comparison with the Hut Lane site. Significantly, Hut Lane is a greenfield site in the Green Belt. National Government Guidance - 'Planning for Traveller Sites' - states that Green Belt boundaries should be altered only in exceptional circumstances. However, there is a presumption in favour of sustainable development on previously developed land in the Green Belt subject to a number of criteria set out in Chorley Local Plan 2012-26 Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

The Central Lancashire Core Strategy contains Policy 8: Gypsy and Traveller and Travelling Showpeople Accommodation which provides criteria that should be applied to applications for any proposals for Gypsy and Traveller or Travelling showpeople sites. The Site Allocation document contains Appendix 1 (page 20) Policy HS11 Gypsy and Traveller and Travelling Showpeople (MMEC67).

At the detailed planning application stage all the relevant polices and guidance; both national and local will need to be complied with.
Title: Mr  
First Name: John  
Last Name: Devine  
Organisation: 

Site/location: 1. Cowling Farm

Modification:
1: Evidence why available/suitable/achievable?
2: Agree with preferred site?
3: Comments on document

The site will be having a road access developed straight through the middle of Green Belt which is no different from the site at Hut Lane where the Romany Gypsies presently live. This would cause disruption to Green Belt whereas the site at Hut Lane does not affect boundaries or disrupt Green Belt.

Also there would be safety issues developing a site so close to affordable and other housing due to be developed on this site.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared?  
5(2): Not justified?  
5(3): Not effective?  
5(4): Not consistent with national policy?

6: Reasons not legally compliant/unsound

1. Having to use Green Belt land for access.

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a. Policy B: Planning for Traveller Sites. Paragraph 10 'Criteria should be set to guide land supply Allocation where there is identified need. Where there is no identified need, criteria based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of Travellers while respecting the interests of the settled community.'

b. Policy D: Rural Exception Sites. Paragraph 13 'If there is a lack of affordable land to meet the Traveller needs, local planning authorities in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable Traveller sites, including using a rural exception site policy for Traveller sites that should also be used to manage applications. A rural exception site policy enables small sites to be used, specifically for affordable Traveller sites, in small rural communities, that would not normally be used for Traveller sites.'

c. Policy E: Traveller Sites in Green Belt. Paragraph 15 '...If a local planning authority wishes to make an exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a Traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a Traveller site only.'

d. Policy I: Implementation. Paragraph 29 'The implementation policies set out in the
National Planning Policy Framework will apply also to plan-making and decision-taking for Traveller sites. In applying those implementation provisions to Traveller sites, references in those provisions to policies in the National Planning Policy Framework should, where relevant, be read to include policies in this planning policy for Traveller sites.

In conclusion, as there is already a viable Traveller site at Hut Lane, which can be made legal by the implementation of the above mentioned paragraphs of the Planning Policy for Traveller Sites, no other site need be considered. The Hut Lane site already has road access and the required services. There is no financial commitment required from Chorley Borough Council and, as the site already benefits from temporary planning consent as a Traveller site, appears to be the only realistic option.

7: Necessary changes
See response to question 6.

8: Participate in examination?

9: Reason participation necessary
Chorley Borough Council have for many years refused to acknowledge their responsibility towards the Travelling community. The refusal to acknowledge or make reference to the Planning Policy for Traveller Sites has caused, for the families living at Hut Lane, unnecessary stress, financial loss and heartache. This is a very serious issue after Chorley Borough Council have refused permission on other Green Belt sites but which they now suddenly find able to grant consent for.

Councils response
The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

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The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The Council has taken into account the Planning Policy for Traveller Sites 2012 namely: The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of
ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The Council has looked at sites put forward by the Gypsy and Traveller community as identified at Appendix 2 of the Preferred Options Document. All are in private ownership therefore the Council has no control over the land and cannot ensure deliverability; a number have been granted planning permission; a number are in the Green Belt and are deemed inappropriate development in the Framework and Planning Policy for Traveller Sites; and a number lie within a high risk flood zone. The Council has assessed 8 sites in its ownership and one of which is a preferred site for allocation therefore it did not need to explore the potential for rural exception sites. The Council has also asked other stakeholders with major landholdings whether they have any suitable land available and they have confirmed that they do not have any suitable sites. In addition the Council has looked at site suggested through its “call for sites” for the Local Plan in 2005 and 2007.

Although in the Green Belt, the Hut Lane site has been included because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites. A planning Inspector in May 2012 (Appeal Ref: APP/D2320/A11/2159688) confirmed the site is greenfield. The Hut Lane site is not considered suitable for allocation primarily because it has a poor sustainability score - Band D -representing the least sustainable site considered.

Hut Lane is located in the Green Belt and in accordance with national policy is discounted because there are no very special circumstances to warrant selection of a site in the Green Belt.

The report provides the necessary detail to allow a comparison with the Hut Lane site. Significantly, Hut Lane is a greenfield site in the Green Belt. National Government Guidance - 'Planning for Traveller Sites' - states that Green Belt boundaries should be altered only in exceptional circumstances. However, there is a presumption in favour of sustainable development on previously developed land in the Green Belt subject to a number of criteria set out in Chorley Local Plan 2012-26 Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

The Central Lancashire Core Strategy contains Policy 8:Gypsy and Traveller and Travelling Showpeople Accommodation which provides criteria that should be applied to applications for any proposals for Gypsy and Traveller or Travelling showpeople sites. The Site Allocation document contains Appendix 1 (page 20) Policy HS11 Gypsy and Traveller and Travelling Showpeople (MMEC67).

At the detailed planning application stage all the relevant polices and guidance; both national and local will need to be complied with.
I do not believe that the Cowling Farm site is available, suitable and achievable due to the factors summarised in section 6 of this representation. This view is based on a number of inaccuracies, statements that could be misleading and inconsistencies contained within the restricted paper prepared by CBC planning team and submitted to Councillors and considered at the CBC meeting of 3rd June 2014 (the Part 2 paper). As there are a number of errors in the Part 2 paper I believe that the recommendation to Councillors was unsound and therefore the preferred option has to be considered unsound.

Table 1 page 23 - The size of the Cowling Farm site is erroneously shown as 0.5ha when it is in fact 9.5ha. This huge discrepancy could have led the Councillors to believe that they were voting for a small parcel of land that was appropriately sized for the permanent Gypsy and Traveller site not a significantly large parcel of land that would be impacted by the building of the permanent Gypsy and Traveller site.

Para 20 - This para states that one of the factors taken into account is peaceful and integrated co-existence, we believe that using Cowling Farm as the preferred option would be detrimental to this policy as the size of the site would make it susceptible to unauthorised and illegal encroachment and encampment by additional transient Gypsies and Travellers. This would not be an issue for a number of other more viable sites which are of appropriate size and could be managed by CBC and resident permanent Gypsies and Travellers.

Para 23 - The costs shown do not reflect the cost of access roads to an adoptable standard. A point that was confirmed by the CBC Head of Planning at a meeting with residents on 26th June 2014. Again this makes the recommendation unsound as it is based on inaccurate data.

Para 24 - CBC considered only 9 sites but 2 of the sites, Hut Lane and Crosse Hall Lane were an insufficient size for the proposed site. In addition other possible sites do not appear to have been considered, for example a plot of land off Southport Road identified by Cllr Terence Brown to Cowling residents at a recent meeting. Therefore there appears to have been a lack of rigour to the identification and assessment of viable sites.

Para 25 - We do not consider that the preferred option is justifiable due to the lack of proportionate evidence.
Para 27 - The Cowling Farm site does not meet this criteria (i.e. not Green Belt) as the proposed access is within the Green Belt.

Para 28 - This para is both misleading and inconsistent with other parts of the document as it states 'it is considered that it is not necessary to allocate a site within the Green Belt' later (in para 47) it states that 'this may require the access road to be removed from the Green Belt.' At best para 28 is misleading but it could be argued that it is in fact untrue.

Para 36 - This para is again misleading as it states when comparing Cowling Farm and Cabbage Hall Fields 'Cowling Farm access could be made via a dedicated access, and would not be via a residential estate road.' This infers that access to Cabbage Hall Fields would be accessed via a residential estate road whereas it is clear from the preferred option document that it can be accessed via Chorley North Industrial Park. Again this para is misleading and could have influenced the Councillors recommendation with incorrect information regarding the preferred option. Also in para 3b there is a subjective statement regarding the topography of the sites. In our opinion Cowling Farm also has a challenging topography which I am sure the planning team would confirm.

Para 37 - The information contained herein is incomplete in respect of Ackhurst Road maybe not being available. Surely the planning team would have confirmed the facts otherwise why was the site even considered. Another example of the incompleteness of the assessment leading to a flawed recommendation.

Para 38 - This is a wholly subjective judgement building on the previously referred to incomplete, erroneous and misleading information. It is unreasonable to refer to 'the most reasonable site' without a full and proper evidence trail.

Para 42 - This para confirms that the planning team have not completed a full financial assessment of the preferred option. It is our opinion following professional advice that the cost of the Cowling Farm site has been massively under costed due to the need to build a dedicated access and adoptable road from the site boundary to the proposed site. Again this is seen as erroneous information upon which a decision has been made.

Para 45 - The second bullet of this para is wrong as a dedicated access is not achievable from the southern boundary due to:
- The access point being through Green Belt land that is the subject of a restrictive covenant.
- There being major road safety implications of such a proposed access.

7: Necessary changes
The Preferred Option document needs to be revised to identify a site that is suitable, deliverable and achievable.

8: Participate in examination? No

9: Reason participation necessary
The Preferred Options document refers to 9.5 hectares. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:
- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.

As with any other development, the Council will liaise with the police authority in
order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The Council has assessed 8 sites in its ownership and one of which is a preferred site for allocation therefore it does not need to consider the land off Southport Road. The access to the proposed Gypsy and Traveller site has yet to be finalised.

Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31-32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm.

The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

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Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key policies
- The land is allocated for housing and employment, therefore the principal of housing
development is established

The site at Cabbage Halls Fields has been discounted as a preferred site, but any proposed access would be from the Chorley North Industrial Park and not Cowslip Way.

Cowling Farm is the most expensive option, along with Harrison's Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - Appendix 5 of the Proposed Allocation document.

The local plan examination has been effectively suspended while the Council considers the allocation of a suitable site for a minimum of five pitches. As such, the formal stages for plan preparation are not restarted. The Council is following the direction and timetable set by the examining inspector.

The reasons for the report to Full Council on 3 June 2014 being a part 2 report were that firstly it contained personal information relating to the children of potential occupants of the site. Secondly the fact that a particular site could potentially be allocated might have had an effect on the value of neighbouring land. In the event that certain sites considered in the report were not approved by members for consultation there would be no public interest in this information being published. However consultation for all sites mentioned in the report was approved on 3 June which meant that the report could then be published.

The Council released the part 2 report on 3rd July 2014 shortly after the Full Council meeting.
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Obviously as the rumour grew, I realised that it was not only Flag Lane that hadn't been notified but practically the whole of Chorley East ward. I am absolutely staggered that such an important decision can be made without informing your constituents who it is directly going to affect. After all, we are the ones who live in the community and will be expected to live in harmony with these people, whilst the price of our housing drops considerably (up to as much as 25% it is predicted). I hope that this will be reflected in the amount of Council Tax we pay but I doubt it very much. What I cannot understand at all is why the Council has thought in their infinite wisdom that the Cowling Farm site is their preferred option. Surely the Council is aware of the nickname given to the Cowling area - that being the Gateway to Rivington and West Pennine Moors. Why do you think that this area has been labelled as such? Probably due to the fact that the area is full of beautiful scenery, green fields, is home to a wide variety of wildlife and provides a fantastic transition from town into country. The area is without doubt the pride of Chorley where people from far and wide are often seen admiring our wonderful landscape, commenting on how lucky we are to live in such a place. The surrounding area has been party to many fantastic events over recent years including Iron Man competitions and perhaps most importantly of all the Commonwealth Games in 2002. Should Gypsy and Travellers be allowed to reside on the Cowling Farm site then I am sorry to say that such landmark events would become a thing of the past. It is really important that the Council need to listen to their constituents and accept that this area is undoubtedly the wrong place for the siting of these Travellers and is not compatible with the Government guidance notes. There are numerous reasons to substantiate these claims:

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4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary
Councils response

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

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As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The Council require a site area estimated at 0.4 hectares at Cowling Farm. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

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The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

Chorley Local Plan Policy ST1: New Provision or Improvement of Footpaths, Cycleways, Bridleways and their associated facilities in existing networks and new development would ensure that pathways are protected.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

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6. Flaws in your presentation
Comments in respect of inconsistencies are noted. The Cowling Farm site scores a Sustainability Assessment Band B and is therefore considered sustainable in terms of proximity to a range of services and facilities. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments. The Council has corrected the inaccurate distance for further/higher education in the Sustainability Appraisal for Yarrow Bridge, this does not affect the overall band of the site. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

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In conclusion I and my family are wholeheartedly against the proposed site for Gypsy and Travellers at Cowling Farm. Whilst I recognise that these people are entitled to live as they wish, I feel it is unfair for their ideals to be imposed upon others without having any voice whatsoever. By denying the settled community of Cowling, Heath Charnock and Limbrick village that opportunity, I can only surmise that the Council wished to push this decision through with as little fuss as possible. What amazes me more than the fact that there was no acknowledgement whatsoever about the consultation, is the lack of pride which Chorley Council have for their own locality. The countryside around Chorley is absolutely beautiful and has been commented upon by numerous visitors who have been to my house. I am convinced that by allowing this development to move forward, this is something that will never be recovered once this expensive mistake has been made and that the Gateway to Rivington and the West Pennine Moors will be lost forever.

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The SA scoring is not weighted as it is not considered that some indicators have more importance. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding Allocation. A number of other factors such as deliverability need to be taken into consideration.

The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report.

Further analysis of the merits of each site has been undertaken. This has considered the information provided from residents and stakeholders, including consultees and
has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.
I am writing to express my disappointment that you are considering siting a Gypsy and Traveller community at Cowling Farm, Chorley. As a family who has worked extremely hard throughout my adult life, we found it possible to buy a property on Flag Lane to give us a great standard of living. We chose Flag Lane as a place of residence because it was in what we consider to be the most beautiful part of Chorley with amazing views, was quiet, protected by Green Belt and ultimately a safe place for our family to grow. Obviously we had to pay a premium to live in such a place and still do in the form of Council Tax I am charged. You can then understand our disbelief and amazement when I heard 3rd hand that the Council was proposing to develop land behind Cowling Farm for Gypsy and Traveller residence. Initially we took the rumour as a joke as we never expected such an important decision, which affects the lives of so many people, to be made without any consultation between residents and Chorley Borough Council. Indeed, it was only when the one property on Flag Lane received a letter of intent that I began to take this seriously.

Obviously as the rumour grew, we realised that it was not only Flag Lane that hadn’t been notified but practically the whole of Chorley East ward. I am shocked that such an important decision can be made without informing your constituents who will be directly affected by this. After all, we are the ones who live in the community and will be expected to live in harmony with these people, whilst the price of our housing drops considerably (up to as much as 25% it is predicted).

What we cannot understand at all is why the Council has thought in their infinite wisdom that the Cowling Farm site is their preferred option. Surely the Council is aware of the nickname given to the Cowling area - that being the Gateway to Rivington and West Pennine Moors. Why do you think that this area has been labelled as such? Probably due to the fact that the area is full of beautiful scenery, green fields, is home to a wide variety of wildlife and provides a fantastic transition from town into country. The area is without doubt the pride of Chorley where people from far and wide are often seen admiring our wonderful landscape, commenting on how lucky we are to live in such a place. It is really important that the Council need to listen to their constituents and accept that this area is undoubtedly the wrong place for the siting of these Travellers and is not compatible with the Government guidance notes. There are numerous reasons to substantiate these claims:

1. Flaws in your presentation
2. Anti-social behaviour
3. Health and safety
4. Economic implications
5. Hidden agenda

FULL DETAILS OF REASONS ON FILE

In conclusion whilst we recognise that these people are entitled to live as they wish, we feel it is unfair for their ideals to be imposed upon others without having any voice whatsoever. By denying the settled community of Cowling, Heath Charnock and
Limbrick village that opportunity, I can only surmise that the Council wished to push this decision through with as little fuss as possible. What amazes us more than the fact that there was no acknowledgement whatsoever about the consultation, is the lack of pride which Chorley Council have for their own locality. The countryside around Chorley is absolutely beautiful and has been commented upon by numerous visitors who have been to my house. We are convinced that by allowing this development to move forward, this is something that will never be recovered once this expensive mistake has been made and that the Gateway to Rivington and the West Pennine Moors will be lost forever.

4(1): Legally compliant?
4(2): Sound?

5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councls response

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

1. Health and safety -

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an
allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.
Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

2. Economic implications
Cowling Farm is the most expensive option, along with Harrison’s Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - Appendix 5 of the Proposed Allocation document.
The Council considers that actual or perceived impact on property value and businesses is not a material planning consideration.

3. Pollution
As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.
The Council require a site area estimated at 0.4 hectares at Cowling Farm. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:
- Community engagement between the settled and Traveller community.
The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.
The Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria g) seeks to ensure that any new development will not cause 'an unacceptable degree of noise disturbance to surrounding land uses'.
The Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building.

4. Hidden agenda
The playing fields at Limbrick are not part of the preferred site option at land at Cowling Farm. The Council has not terminated the lease on the children’s football pitch situated on Weavers Brow. See response above on health and safety - access in relation to covenants.
The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local
Chorley Local Plan Policy ST1: New Provision or Improvement of Footpaths, Cycleways, Bridleways and their associated facilities in existing networks and new development would ensure that pathways are protected.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no ‘exceptional’ circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

5. Anti-social behaviour

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The needs of transient and permanent Travellers are likely to have different locational requirements. The Council now commits to undertake further work on the Gypsy and Traveller Accommodation Assessment (GTAA), this work has now started. The Council will prepare a joint Gypsy and Traveller and Travelling Showpeople Accommodation Local Plan in line with the outcomes of the further GTAA work, to include transit site provision.

6. Flaws in your presentation

Comments in respect of inconsistencies are noted. The Cowling Farm site scores a Sustainability Assessment Band B and is therefore considered sustainable in terms of proximity to a range of services and facilities. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments. The Council has corrected the inaccurate distance for further/higher education in the Sustainability Appraisal for Yarrow Bridge, this does not affect the overall band of the site.

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The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report.

Further analysis of the merits of each site has been undertaken. This has considered
the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.
I am writing to express my concerns about the validity of the report issued by Chorley Borough Council and consequently flawed choice of Cowling Farm as the preferred option for the development of a Gypsy, Traveller and Travelling Showpeople site.

There are anomalies/inconsistencies and errors which highlight the need for accurate research and use of correct data before drawing valid conclusions. The following points are examples and not a comprehensive list:

1. The greenfield status of Cowling Farm is cited as having a positive value for grazing animals (whose?). However it is cited as negative use of greenfield/agricultural land for Cabbage Hall Fields, Land off Westhoughton Road and Crosse Hall Lane.

2. Conflict with local business community has been given as a counter argument against the Cabbage Hall Fields site. This also applies to Cowling Farm. In fact two of the existing businesses have already said that they will move out if a Travellers site is developed here. Will new businesses still be attracted to the area and what impact will this have on employment and the local economy?

3. Poor access to a GP and PO plus a motorway junction being 3-5km away are given against the Crosse Hall Lane site. This also applies to Cowling Farm.

4. Danger of flooding is given as a reason not to develop the Yarrow Bridge site. This is incorrect. The area is identified by the insurance industry as carrying no adverse risk. The site is also no further from a college of further education than many other proposed sites. It is in fact nearer than some sites and has direct access by bus to Runshaw College.

5. Noise and pollution from the motorway were cited as objections to Crosse Hall Lane but not to Cowling Farm.

6. It is noted that the frequency of buses along Cowling Road is stated as less than hourly. It is in fact only two buses per week.

In addition to the points raised above there are compelling reasons why the Cowling Farm site should not be developed.

The site carries the highest risk of overspill/illegal encampment on Green Belt land and the beautiful West Pennine Moors which are valuable assets to CBC for tourism and recreation. Do CBC want to risk another Dale Farm and all the associated problems both environmental and economic?

The road network through Limbrick and along Weavers Brow/Cowling Road/Long Lane is totally unsuitable for the proposed increase in traffic especially vehicles towing along caravans. They are already congested at peak times and there are sharp bends, narrow bridges and traffic calming measures which restrict traffic to one lane along part of the route. There have already been several serious accidents including one...
fatality and an incident only last week where a motorcyclist lost a toe. In the winter
the roads can become impassable and dangerous if there is snow and ice. CBC do not
clear the roads and it is only due to the efforts of Mr Parkin at Cowling Farm that the
road is kept open during really bad weather.

I believe that the development of Cowling Farm as the preferred option could be the
most costly financially due to the local topography, drainage problems and need to
create access to the site across Green Belt land next to a listed building. Why is
proposed use of Green Belt land being considered as allowable here but not on other
sites?

For one of the other proposed sites the negative effect on local residents was cited.
Why does this also not apply to the settled community near Cowling Farm? It is
alleged that at a meeting at which planners and local Councillors were present, this
option was chosen as the preferred site because 'It is out of the way there and there
are fewer local residents to object than elsewhere.' Do CBC consider that because the
local settled community is relatively smaller than in other areas of Chorley that our
opinions and concerns are of less value? Are we in fact being discriminated against as a
small group?

Why was the Localism Act largely ignored and the local residents not consulted before
the plan was issued? It is well documented in both Police and Magistrates Courts
records that anti-social behaviour and crime can increase in the vicinity of Traveller
sites. House values can fall, both house and car insurance rates rise and properties
become difficult/impossible to sell. Will CBC offer compensation and lower the Council
Tax bands in the area?

Although the local community may be relatively small most of the properties are in
higher than average Council Tax bands and therefore make a greater per capita
contribution to local taxation.

How will the presence of a Traveller site affect the building of new homes and business
premises? Will CBC be able to realise the proper financial and employment potential
of the land for the benefit of the local tax payers?

How many local Councillors/local planners would welcome a Travellers site in their
backyards? It has also been alleged that the Yarrow Bridge site will never be chosen
because of whose ward it is in.

In conclusion I consider that the proposal is unsound from the planning and financial
perspectives and totally unacceptable because of the negative impact on the
environment and local community. The plan is political correctness gone mad.

I believe that Stockton planning department has had to scrap plans for the
development of Traveller sites due to local opposition and Blackpool local authority
are experiencing similar problems or resistance from the local community.

Does the local community here not have the human right to the quiet enjoyment of
our homes and gardens without the planning/environmental and financial impacts
detailed above and the constant fear and worry of increasing rates of anti-social
behaviour and crime?

The need to restore the Hut Lane site to its original condition is partially due to
incompetence on the part of CBC planning/building regulations departments. The
Traveller community own this site and planning permission was only granted for a
stable block and horse exercise area. Where were planning/building regulations when
hard core was put down, a septic tank and a shower and toilet block were installed?
How much local rate payer money has already been spent trying to address this and why does this area now have to be considered for another Traveller site in the same general vicinity? Who is going to pay for restoration of the Hut Lane site?

It is public money from general and local taxation that you propose spending and the local electorate and tax payers have voices that need to be heard and grave concerns that need to be addressed. Have the Travellers, whose needs seem to take precedence over those of the settled community, paid towards local and general taxation?

It came to my attention last night, after I had already submitted my letter to the Council, that there are three important and relevant facts that you should be aware of:

1) I have it on good authority that the leader of the Council (his ward includes the Yarrow Bridge Site) has written personally to a large number of residents in his ward with information/advice about the development of this site. Is this an objective action on his part in view of his position? Under the “Freedom of Information Act” are not all residents in the vicinity of the sites being considered (possibly all Chorley rate payers) entitled to receive the same information about the proposed plans. Only one resident of Flag Lane received a letter from the Council, six weeks ago, and some of residents of our area are only now, with the dead line for objection imminent, becoming aware of the planned development.

2) I was informed, by more than one long term Chorley local resident, that the Yarrow Bridge site was historically an established Traveller site that was turned into a storage depot by the Council. I understand that advice from the “Office of the Deputy Prime Minister” refers to the 1994 Act and states that local authorities have the duty to maintain current sites and repair/refurbish those that have fallen into disrepair. Is this the reason why part of the site was omitted from the plan?

3) There is a scout camp above/overlooking the Cowling Farm site. The manager was not informed officially and has only just become aware of the proposals. There are large numbers of young cub scouts and boy scouts who camp there annually. How will the proposed plans affect the risk assessment and child protection policies for these largely outdoor activities?

Objection and concerns noted. Sites that are greenfield score lower than brownfield sites in the Sustainability Appraisal. Of the sites mentioned all are greenfield apart from Westhoughton road which scores higher for this indicator in the SA as it is a brownfield site.

The Council considers that actual or perceived impact on property value and businesses is not a material planning consideration.
Proximity to a motorway junction is only one of 42 sustainability indicators and not a deciding factor in the allocation of a permanent Traveller site. It is likely that its significance will be greater in consideration of a transit site which is being progressed in the Council’s Development Plan Document.

In respect of Yarrow Bridge, The Environment Agency has stated that the area fronting the A6 is liable to flood risk and as such it will not support the location of residential caravans here. However, it is content for this land to be used to access land to the east, which is outside the flood zone, for the permanent Traveller provision.

In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments. The Council has corrected the inaccurate distance for further/higher education in the Sustainability Appraisal for Yarrow Bridge, this does not affect the overall band of the site.

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will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

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The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

See response to GT198.
1. Cowling Farm

In so far as it relates to our remit, we support the preferred option for Gypsy and Traveller provision at Site 1: Cowling Farm, Chorley.

Support for Cowling Farm site noted.
I am a local resident who has recently moved less than 1 mile from the proposed new Gypsy and Traveller site at “Cowling Farm”. I have lived in Chorley my entire life and work here and have raised a family here. My mother and family grew up at Cowling. I know the area very well probably far better than most. I have only just heard about this proposed development and I have to say I am shocked and disgusted. I have not been told by the Council I have heard from word of mouth and only recently which gives me no time at all to put everything into this letter so this will just be the tip of the iceberg.

The main issue to start with is that the criteria that put this site at the top have been manipulated, they are full of errors and the matrix assessing all the sites needs to be overhauled and completed correctly. Just briefly from a quick look I can see many errors.

- The bus site – it has one bus that comes twice a week and there is no scope to increase this as the road is too narrow along long lane, there are no footpaths, the road is single track in places and the small bridge cannot take any more traffic. So how it has been ranked so high for those criteria is just nonsense.

- The schools – this site is nowhere near any schools. I drive my children to school every day and they go to the nearest school and it takes me 15 minutes’ drive on a clear run. That is just for a primary school. The nearest secondary school would be even further. Certainly not within walking distance and I am not lazy at all. All of the other sites are nearer to schools than this one.

- This area cannot cope with any more traffic at all, we have in recent years had traffic calming devices put along the road that would be the main and only road into the site. There is no scope to widen the roads as they are already right up to residents boundaries and there are long stretches with no footpaths on either side that are used by a large amount of walkers as this is an area of local beauty. To increase traffic would be detrimental to the area. And pedestrians would be injured and even killed in no time at all. The area is used by all kinds of people as a recreational area for cycling, walking, visiting the beautiful open garden (directly opposite what would be the site entrance) and enjoyment every day. This would all cease in no time at all.

- It is a very small place and the infrastructure here is to meet the needs of a small community. You would decimate the area with this proposed plan.

- No conservation or listed buildings on site. The site has been named Cowling Farm which is disgusting in itself as my friend and neighbour owns Cowling Farm and he has Gypsies pulling on his drive already looking for the said site. Cowling Farm/Barn is a listed building and is in a conservation area and is right at the entrance to the site and would be overlooking the proposed site. It is a stone’s throw away from the proposed site – surely that cannot be ignored.

- The impact this would have on recreation and tourism, which is the main focus of
this entire local area, would be to destroy what everyone considers to be a local beauty spot and comes here to enjoy.

-The site would become illegal in no time at all and would grow out of control as there would be no way of stopping it from expanding on the whole field and surrounding fields. This would destroy the area and outweigh the local community, we would become a minority in our homes.

-The site is very sloping – not flat and is surrounded by Green Belt that is farmed. The local farmers would suffer in a short space of time as the site would expand and the surrounding area be destroyed. The cricket field and football pitch where my family play and are members would also be ruined.

-The proposed entrance to the site would require the Council to use land that was donated to them with a restrictive covenant that is for recreational purposes only. The land is currently being used for that purpose and should not be taken away from its current use. It was not meant ever to be used for this purpose and the covenant should be overlooked.

-I cannot think of a single part of the area that would benefit from this at all and the consequences of putting the site here would be to destroy the entire area.

-I strongly believe that there are better sites and sites more appropriate that if ranked properly and accurately based on actual current facts – would all rank higher than this site.

Please re consider all options available and consider carefully how this would devastate the area of Cowling and its immediate and further surroundings.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
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Councils response

National Planning Practice Guidance states “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.”

The SA scoring is not weighted as it is not considered that some indicators have more importance. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding Allocation. A number of other factors such as deliverability need to be taken into consideration.

The Council considers that the methodology for Sustainability Appraisal/Assessment...
has already been considered by the Inspector, and has been found sound in her partial report.

Further analysis of the merits of each site has been undertaken. This has considered the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.

Cowling Farm, as the Council’s preferred site is indicated as being deliverable, however, that is in the context of other sites being potentially deliverable. Comments in respect of inconsistencies are noted. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

The Cowling Farm site is allocated in the Chorley Local Plan 2012-206 for a mix of housing and employment. This site is not in the Green Belt.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are ‘not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt’. These include ‘local transport infrastructure which can demonstrate a requirement for a Green Belt location.’ In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The site at Cowling Farm does not utilise the area or impact on the facilities at Limbrick.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of
ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The undulating topography of the site will be taken account of as part of the masterplanning process for the site. It is considered that some contouring will be required to facilitate the development of the Gypsy and Traveller pitches and the allocation as a whole.
We also would like to object to the preferred site proposal for Cowling Farm on a number of points:

- Alternative sites are more appropriate such as Yarrow Bridge based on the criteria outlined in the document.
- The proposal does not respond to the preferences provided by the prospective users.
- Best practice use of Brown Field sites should come before Green Field impacting sites.
- Value for tax payer money as other sites are cheaper.
- Unsound basis of selection with unclear weighting attributed to key factors.
- Preferred site decision-making process not articulated for consideration and comment.
- Practical issues related to the location of the site such as Green Belt access route, public transport limitations, increased traffic and road safety.
- Impact on the open character of the location related to surrounding residential property and businesses.
- Geographical nature of the site.

The Cowling Farm site is allocated in the Chorley Local Plan 2012-206 for a mix of housing and employment. This site is not in the Green Belt. The site is within the settlement of Chorley.

The access to the proposed Gypsy and Traveller site has yet to be finalised.

Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the
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Comments in respect of inconsistencies are noted. The Cowling Farm site scores a Sustainability Assessment Band B and is therefore considered sustainable in terms of proximity to a range of services and facilities. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no ‘exceptional’ circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:
• The land is owned by the Council and is deliverable and developable
• A dedicated access is achievable
• The land is within the settlement of Chorley and accessible to services and facilities
• It has the potential to meet the needs of the existing Traveller community at Hut Lane
• The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• It is sustainable, scoring B and would be compliant with the Core Strategy key policies
• The land is allocated for housing and employment, therefore the principal of housing development is established.

National Planning Practice Guidance states “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local
Plan."

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The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report.

Further analysis of the merits of each site has been undertaken. This has considered the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.
I am disappointed at the total lack of consideration given to all parties involved in the proposed site for a Gypsy development. The way it has been conducted has caused unnecessary ill feeling and conflict for all parties.

1. You have not followed the government's criteria for choice of site, in many aspects, which I will not go into now as I am sure you are well aware of them.

2. The proposal seems to be biased towards that particular site with many anomalies in the proposal, which again is totally unacceptable.

3. No consideration has been given to the Grade II listed building on which this site will have the biggest impact, and certainly no respect for the residents of the property who were neither consulted nor informed by yourselves. Were the Council even aware of the listed building status as there has been no reference to it in the report?

4. How can you justify using Green Belt for access when you are proposing to move a family from the Hut Lane site due to Green Belt issues?

5. Education does not appear to be a paramount consideration with the Council? Have you taken this into account? No bus services for the residents. Limited number of places in the local schools. How will these residents be integrated into the community, especially stuck in a corner of a 22 acre site!

6. This proposal does not affect just the people in the 9 areas but the whole of Chorley. This is a very valuable site if sold, and given the shortfalls in the Council budget the ratepayers of Chorley would be appalled if they were fully aware of the expense going into the use of this issue. I understand so far that the cost incurred already by the ratepayers of Chorley in this matter is approximately £280,000, for the one family. Surely the site should be a small family friendly site, where the family can manage it themselves and hopefully no extra expenditure incurred due to illegal Travellers visiting. Should you not have learnt by others mistakes!

7. This site is largest financial asset of the chosen sites. Possibly in excess of £5 million. This money could be directed into areas which are under financial strain, elderly and children's services etc. How much more money are the ratepayers of Chorley going to lose, by choosing this site.

8. I think we as residents of Chorley deserve some respect and consideration, this is such a big issue for us and insufficient consultation and consideration has been given. Cowling Farm site will have more impact on the environment than any other site. This route is the Gateway to the West Pennine Moors and Rivington areas of prestige and great beauty, used by hundreds of people and not just from the Chorley area. How can you even think of jeopardizing this? Unbelievable!

9. You are failing the local community, the ratepayers of Chorley the visitors and sightseers to Lancashire. This decision must be reconsidered as there are other
potential sites available which would really benefit from investment. Your site at Yarrow Bridge is an eyesore to the local community, yet a nice small contained site with excellent access and excellent for the local schools. Green Belt field at the rear. Would meet many of the criteria’s. However use of Cowling Farm will be a significant loss of natural beauty and heritage, and, have a major negative impact on the local community and surrounding areas.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared?  □
5(2): Not justified?  □
5(3): Not effective?  □
5(4): Not consistent with national policy?  □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response Support for Yarrow Bridge is noted. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
I am particularly concerned about the apparently preferred site at Cowling farm. I am aware that many other residents have also submitted their comments for you consideration all of which I would echo. I would in particular highlight the following.

Please can it be explained why Cowling farm is the preferred site when in the report it shows:

1) The report states that it’s the most expensive option, is this the best use of available funds.

2) The size of the site seems very large in comparison to the need. It’s rumoured that the site has been valued at 4 million currently, would the proposed site affect that its believable that a potential developer would have concerns over the commercial viability of any new development adjacent to the site. The size of this site may also allow over occupation and ingress into adjoining fields which would be costly to rectify.

3) The site heavily undulates and its believed would be expensive to properly drain.

4) Access to the site is also a perceived issue its rumoured that a Council representative has stated that the proposed option would be to put an entry road into the site to the south of Cowling Farm on the green field owned by Chorley Council and position the plots directly behind Cowling Farm, because the site was nearest the road and the field was level at this point this was said to be the least expensive option. Some of the other sites being considered already have road access so would eliminate the need for any road building a much more economical option, or site levelling would surely be cheaper than building a new road. Cowling Rd, Cowling Brow, Brook St and Eaves Lane are already subject to heavy traffic with calming measures and weight restrictions in place, the extra traffic would be too much for the road system to cope. The visual impact on the site would be immense Cowling Rd is the main route from Chorley to Rivington an area of outstanding beauty the site is surrounded by green fields. The site adjoins the Limbrick playing fields these fields were given to the Chorley people for recreational use and I would worry that the site would spill over and have an adverse impact on the playing fields and the green field site to the south of the proposed road.

5) This site has extremely poor transport links – the bus service is extremely limited with significantly less than the 1 per hour and its not easily accessible for either of the preferred schools – Adlington Primary and Southlands. Access to motorway junction – further than Crosse Hall Lane. Roads – treacherous in winter conditions – Cowling Brow is impassable when snowing – lorries and cars alike struggle to make it in both directions in icy conditions. Chorley Council do not clear Cowling Brow. Mini roundabout at Canal Bridge and Weavers Brow hairpin bend – number of accidents have already resulted in loss of life and casualties. Traffic calming measures have not helped with vehicles speeding up once over the passed the speed bumps on
Cowling Brow.
Long Lane – narrow road, speeding vehicles, single lane bridge, Limbrick - hill past pub – unsuitable for caravans travelling through here will result in an inevitable accident

6) The alternatives sites – by comparison and expected to be cheaper
Yarrow Bridge depot– whilst Green Belt – already used by Council. Entified by the current residents of the Hutt lane site. Previously developed site, and partially brownfield. Very good access to public transport and schools and services and amenities. Access already, whilst well screened from road and no immediate surrounding residential development. Caravan site already in area. Small site – but fits size recommendation of 0.4 hectares - has no other economic impact utilising this site. One noted is further/higher education – yet Runshaw buses stop directly at bus stop at the site and the Cowling site is significantly less accessible & further away. Rivington & Blackrod school is 4.4 miles from Yarrow Bridge hotel and 4.9 miles from Flag Lane, (AA autoroute) and Yarrow Bridge hotel is on a bus route to Bolton Or Cabbage Hall Fields - Significantly more "green" in site performance. Better size, less cost, £80k cheaper to develop, less impact on overall area. Better access to local facilities and public transport and road network
Cowling also in 3km of congestion spot. Cowling also Greenfield site

I feel that this shows some of the issues we feel the proposed site creates and look forward to receiving some reply by way of further explanation

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
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Councils response

The Cowling Farm site is allocated for housing and employment in the Chorley local Plan 2012-2026 therefore the principal of development is established. The site has not been valued for employment and housing, neither has the site been marketed by the Council on the open market.
Cowling Farm is the most expensive option, along with Harrison's Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency.
The detailed cost information has been updated - Appendix 5 of the Proposed Allocation document.
The undulating topography of the site will be taken account of as part of the masterplanning process for the site. It is considered that some contouring will be required to facilitate the development of the Gypsy and Traveller pitches and the allocation as a whole.
The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of
ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

• Community engagement between the settled and Traveller community.
• The masterplanning process.
• Highways options in relation to the delivery of the mixed use site.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are ‘not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt’. These include ‘local transport infrastructure which can demonstrate a requirement for a Green Belt location.’ In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The site at Cowling Farm does not utilise the area or impact on the facilities at Limbrick.

Comments in respect of inconsistencies are noted. It is recognised that public transport is limited in this area. However, this has to be considered in the context of a total of 42 sustainability indicators. Proximity to a motorway junction is only one of 42 sustainability indicators and not a deciding factor in the allocation of a permanent Traveller site. It is likely that its significance will be greater in consideration of a transit site which is being progressed
in the Council’s Development Plan Document. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The Council has discounted the Cabbage Hall Fields site as a Gypsy and Traveller site because of the changes in the levels on site which are likely to restrict the number of pitches.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

• The land is owned by the Council and is deliverable and developable
• A dedicated access is achievable
• The land is within the settlement of Chorley and accessible to services and facilities
• It has the potential to meet the needs of the existing Traveller community at Hut Lane
• The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• It is sustainable, scoring B and would be compliant with the Core Strategy key policies
• The land is allocated for housing and employment, therefore the principal of housing development is established
I would like to object to the current proposals for a Gypsy and Traveller and Travelling Showpeople site on land to the rear of Cowling Farm Cowling Road Chorley. I think the decision is not legally compliant or sound.

The site as proposed would result in an incredible misuse of public funds. I would like Chorley Council to publish the value of this valuable employment land so that the people of Chorley realise how much this proposed site is costing. Set out land value, costs for access roads, utilities, toilet blocks hard standing, landscaping etc. I believe the site would need an electricity substation and a pumping station for the sewerage. Have Chorley Council ever advertised this land on the open market to see if it could be utilised for employment or housing? If the proposed site was situated on a less valuable piece of land Chorley Council could have millions to spare.

The land at Cowling Farm is over 20 acres and I believe that if a smaller site was chosen the Council would be able to limit the number of families occupying the site at any one time, the risk of expansion and the associated costs could be more easily controlled. Other Councils across England have spent millions on sites that have been expanded illegally, this could easily happen in Chorley. The Council has stated a minimum of 5 permanent pitches but has not stated a maximum.

I have been told by a Council employee that the proposed option would be to put an entry road into the site to the south of Cowling Farm on the Green Belt owned by Chorley Council. The proposed site entry from Cowling Rd has a steep incline I suspect the road would use a greater area of Green Belt than the whole of the site at Hut Lane (what is the difference between that Green Belt and this?). If you can’t use Green Belt at Hut Lane why can you use it here?

Why have Chorley Council spent £280,000 protecting Green Belt at Hut lane then propose to use the valuable Green Belt land that would be better used for sports and leisure at Cowling?

The Council has been very inconsiderate in the way it has dealt with the whole issue, firstly it has chosen and published nine sites and has caused unnecessary upset in all those neighbourhoods. It has not adhered to the government guidelines for the planning of a site; the proposal has been very badly managed. It has not consulted local businesses and residents in a timely manner.

The Council has not considered the impact of the development on the existing residents of Cowling. The Council has a duty to protect the rights of the existing residents. Why is Cowling the Councils preferred site? The whole basis of selecting the sites is flawed and the tables shown are factually incorrect.

Cowling Farm is a grade II listed building and the Council has a duty to protect the setting of a listed building. I believe this proposed site would impact on the historical significance and visual aspect of this building.

4(1): Legally compliant? No
**Rep No**  GT151  
**Client ID**  133

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**Councils response**

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The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- Community engagement between the settled and Traveller community.
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- Highways options in relation to the delivery of the mixed use site.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the
site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The Hut Lane site has been included in the Preferred Options document because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites. A planning Inspector in May 2012 (Appeal Ref: APP/D2320/A11/2159688) confirmed the site is greenfield. The Hut Lane site is not considered suitable for allocation primarily because it has a poor sustainability score - Band D - representing the least sustainable site considered. The report provides the necessary detail to allow a comparison with the Hut Lane site. Significantly, Hut Lane is a greenfield site in the Green Belt. National Government Guidance - 'Planning for Traveller Sites' - states that Green Belt boundaries should be altered only in exceptional circumstances. However, there is a presumption in favour of sustainable development on previously developed land in the Green Belt subject to a number of criteria set out in Chorley Local Plan 2012-26 Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt. Hut Lane is located in the Green Belt and in accordance with national policy is discounted because there are no very special circumstances to warrant selection of a site in the Green Belt.

The site at Cowling Farm does not utilise the area or facilities at Limbrick.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options
which forms part of the Chorley Local Plan 2012-2026.

Factual inaccuracies have been noted. The Sustainability Appraisal (SA) of the sites allows the sustainability of each site in relation to a number of indicators to be assessed. Each site is then given an overall band in order to allow the sustainability of each site to be compared. The methodology for the SA is set out in the 'Sustainability Appraisal Scoping Report' published in September 2009, and is the same approach used to assess and compare the sustainability of all the housing and employment Allocation that were considered. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:

- the contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
- the impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
- how any harm might be removed or reduced
- the impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.
I am particularly concerned by two key issues:

1. A failure by Chorley Borough Council to follow a transparent, fair and proper process.

My own research has highlighted aspects of the Planning Policy for Traveller Sites issued by DCLG that have not been addressed properly by CBC:

- 'plan making and decision taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.' The Council is refusing to declare an upper limit for a number of pitches until survey work is completed in December 2014 and has not provided any detail of how the site will be structured, but wants to progress the Local Plan to adoption regardless. How can CBC realistically regard this decision as anything other than flawed? How will CBC and the settled community handle the inevitable volume of illegal Travellers that will certainly follow if the proposed development is not capped?

- 'pay particular attention to early and effective community engagement with both settled and Traveller communities.' There is scant evidence that CBC has attempted to meet its obligations under the Localism Act 2011. Despite reference in paragraph 3.1, I only became aware of the proposal via the grapevine. This distinct lack of regard for the settled community from CBC has culminated in the creation of the Cowling Action Group. CBC has apparently issued the planning policy notification letter only to those in the Borough who have previously raised objections to planning applications irrespective of their relevance to this particular proposal, whilst not deeming it necessary to notify those directly affected by it. This is frankly underhand, bordering immoral.

- 'use a robust evidence base to establish accommodation needs.' CBC has identified what it considers to be a preferred location for a Travellers site by using criteria which are often unclear and inconsistently applied to the other locations considered. For example, paragraph 6.1, why if only 0.4 ha is required to meet the requirement has CBC allocated 9.5 ha without explaining how it will be structured/constrained?

2. Traffic flow/access/road safety concerns.

Cowling Farm is at the crest of Cowling Road and Weavers Brow resulting in restricted visibility to oncoming traffic from either direction. On-road car parking on both sides of the road (particularly during sporting events on Gillett Playing Fields) compounds this hazard. The hazard is further compounded by the lack of road signs to indicate the speed limit which commonly result in excess speed from either direction as traffic users assume national speed limits apply. If there is to be a significant increase in the volume of vehicles of the size referred to in paragraph 6.1, considerable thought would need to be applied by Lancashire County Council Highways to traffic calming if access were to be made from the adjacent Cowling Farm. Suspiciously an electronic 'think bike' sign was recently removed from its location almost exactly opposite
Cowling Farm, confirmation if any were needed that Lancashire County Council Highways already recognise the location as an accident black spot.

The suggestion from Lancashire County Council Highways that hedgerows would require removal would exacerbate the issue of casual access to land not designated for Travellers.

The narrow confines at the bridge on Long Lane adjacent to the Black Horse public house at Limbrick make it completely unsuited for access to caravans, large vehicles and vehicles with trailers.

Interestingly, comments in the site information and sustainability appraisal section of the Preferred Options document note in respect of the Crosse Hall Lane location '...the site has poor access to a motorway junction which is over 3km away.' No such observation was made about the Cowling Farm proposal which is in fact even further distant from the nearest motorway junction. This provides a further example of the inconsistent use of selection criteria.

Either of the alternative options of Yarrow Bridge or Hut Lane offer plots that will better meet the objectives of the existing Traveller community outlined in paragraph 6.10.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

The Council has taken into account the Planning Policy for Traveller Sites 2012 namely: The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The Council has assessed 8 sites in its ownership and one of which is a preferred site for allocation therefore it did not need to explore the potential for rural exception sites. The Council has also asked other stakeholders with major landholdings whether they have any suitable land available and they have confirmed that they do not have any suitable sites. In addition the Council has looked at site suggested through its "call for sites" for the Local Plan in 2005 and 2007.
The Hut Lane site has been included because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites. A planning Inspector in May 2012 (Appeal Ref: APP/D2320/A11/2159688) confirmed the site is greenfield. The Hut Lane site is not considered suitable for allocation primarily because it has a poor sustainability score - Band D - representing the least sustainable site considered. The report provides the necessary detail to allow a comparison with the Hut Lane site. Significantly, Hut Lane is a greenfield site in the Green Belt. National Government Guidance - 'Planning for Traveller Sites' - states that Green Belt boundaries should be altered only in exceptional circumstances. However, there is a presumption in favour of sustainable development on previously developed land in the Green Belt subject to a number of criteria set out in Chorley Local Plan 2012-26 Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt. Hut Lane is located in the Green Belt and in accordance with national policy is discounted because there are no very special circumstances to warrant selection of a site in the Green Belt.

The Central Lancashire Core Strategy contains Policy 8: Gypsy and Traveller and Travelling Showpeople Accommodation which provides criteria that should be applied to applications for any proposals for Gypsy and Traveller or Travelling showpeople sites. The Preferred Options document Appendix 1 contains Policy HS11 Gypsy and Traveller and Travelling Showpeople (MMEC67). At the detailed planning application stage all the relevant polices and guidance; both national and local will need to be complied with.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing.
If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.

Traffic flow/access/road safety concerns:
The access to the proposed Gypsy and Traveller site has yet to be finalised.
Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31 - 32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are ‘not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt’. These include ‘local transport infrastructure which can demonstrate a requirement for a Green Belt location.’ In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Proximity to a motorway junction is only one of 42 sustainability indicators and not a deciding factor in the allocation of a permanent Traveller site. It is likely that its significance will be greater in consideration of a transit site which is being progressed in the Council’s Development Plan Document.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Reference to why the Hut Lane site has been discounted is covered above. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no ‘exceptional’ circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
I strongly object to making Cowling Farm the preferred option site on the following grounds:

I do not believe research into this site has been conducted objectively. It would appear that the research is geared to making the Cowling Farm site seem more suitable, at the expense of the truth, whilst trying to discredit the other sites also untruthfully. One has to ask the question why?

The document states that there are only farm buildings to the west of the site. Truth - there are no farm buildings only private residences.

The document states that the site is in close proximity to a small number of housing and industrial units. Truth - there are in fact approx. 50 businesses together with two housing estates plus other residences in Cowling Road, Back Lane and Limbrick, two historic public houses, a cricket field, a football pitch and a scout camp, all in close proximity to the proposed site. Cowling Farm is a Grade II listed building but I would suggest that all the houses in Cowling Road are of historic interest, representing Chorley's cotton and farming past. All would be severely compromised by having a Gypsy and Traveller site bordering their property, on land that has previously been described as an area of special landscape. No amount of landscaping and screening can compensate for this.

The document also states that parts of the land behind Cowling Farm are relatively flat. Truth - the site actually slopes steeply to the east and marginally less to the south. Its is also subject to flooding during period of heavy rainfall and due to height above sea level is extremely exposed to high winds from both the west and east for a large proportion of the year. I would suggest that this is not in keeping with caravan dwelling. I also fear that the cost of draining this site and providing services has been grossly underestimated.

The document also stated that the site was reasonably close to a range of services but also conversely stated that it was not close to medical services, a Post Office or local centre. It also stated that there was a regular bus service. Truth - there is no regular bus service. There is a limited service on only two days each week. There is also no school transport.

Other points to consider:

The proposal to site an entrance road to the site to the south of Cowling Farm is fraught with danger. Traffic coming from the Chorley direction is hidden from view until past the Spinners Arms due to the steep hill and the road veering to the left. I know only too well the difficulty of turning onto the road. Most of the traffic passing this point does not adhere to the speed limit with motorbikes passing at up to 70mph. There have already been accidents. Cowling Brow is already over used by heavy goods traffic as are Eaves Lane, Lyons Lane and Brook Street and also Long Lane to the south. During periods of snow these vehicles block the roads for long periods making them...
I am also concerned as to how the Council would constrain the numbers using the site given the size of the area as site creep has happened in other areas. I am also concerned about the level of noise that may come from the site given the Gypsies preference for outdoor living. Residents living near other Gypsy sites report that the level of noise is excessive. How would the Council police this given the low level of policing in Chorley? What is the cost to the taxpayer of removing unauthorised users of the land? Would smaller sites not be more feasible so that they can be contained and policed by the Gypsies themselves.

Cowling Farm is a greenfield site and Core Strategy Policy 1 favours brownfield sites over greenfield sites. It also states that use of Green Belt land is inappropriate. How can using Green Belt land for access be deemed appropriate when other options exist at this site and others?

Finally I would ask the Council to reconsider making Cowling Farm their preferred option as the decision has obviously been reached based upon flawed evidence. I would suggest that other sites exist in Chorley for example brownfield sites at Yarrow Bridge, Cabbage Hall Fields and Ackhurst that can be more contained, are nearer to schools and services and can be delivered at less cost to the taxpayer.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? ☐
5(2): Not justified? ☐
5(3): Not effective? ☐
5(4): Not consistent with national policy? ☐
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

Objection Noted. Comments in respect of inconsistencies are noted. It is recognised that public transport is limited in this area. However, this has to be considered in the context of a total of 42 sustainability indicators.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for
the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The Cowling Farm site is allocated for housing and employment therefore the principal of development is established. The allocated site is not located within the Green Belt. The site is greenfield and located within the settlement of Chorley.

The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building. Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria g) seeks to ensure that any new development will not cause 'an unacceptable degree of noise disturbance to surrounding land uses'.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The Council has discounted the Cabbage Hall Fields site as a Gypsy and Traveller site because the site has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
<table>
<thead>
<tr>
<th>Modification</th>
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<tbody>
<tr>
<td>1: Evidence why available/suitable/achievable?</td>
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<tr>
<td>The site is not suitable for Gypsy provision.</td>
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<tr>
<td>2: Agree with preferred site?</td>
<td>No</td>
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<td>3: Comments on document</td>
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<tr>
<td>Totally biased towards making Cowling Farm the preferred option with no justification.</td>
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<tr>
<td>4(1): Legally compliant?</td>
<td>No</td>
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<td>4(2): Sound?</td>
<td>No</td>
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<tr>
<td>5(1): Not positively prepared?</td>
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<td>5(3): Not effective?</td>
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<td>5(4): Not consistent with national policy?</td>
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<td>6: Reasons not legally compliant/unsound</td>
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<td>The preferred option is unsound for the following reasons if we refer to the site performance:</td>
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<tr>
<td>- Cowling Farm has 24 green indicators, 5 light green, 7 yellow and 5 orange.</td>
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<td>- Cabbage Hall Fields has 27 green, 10 light green, 2 yellow and 1 orange.</td>
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<td>- Crosse Hall Lane has 27 green, 7 light green, 7 yellow and 1 orange.</td>
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<tr>
<td>- Land adjacent to Northgate Drive has 24 green, 11 light green, 5 yellow and 1 orange.</td>
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<td>How is it possible that Cowling Farm is the preferred option when there are three other options that have far better site performance indicators. On this evidence alone Cowling Farm is the 4th best option. I am a fairly new resident to the area and in that short time it is obvious that less traffic is needed on Weavers Brow/Cowling Road/Long Lane and not more.</td>
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<td>7: Necessary changes</td>
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<td>Common sense should prevail and the whole process should be looked at again.</td>
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<td>Why has there been no consultation with the locals?</td>
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<td>8: Participate in examination?</td>
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<td>9: Reason participation necessary</td>
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<tr>
<td>Councils response</td>
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<td>National Planning Practice Guidance states “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan. “ The SA scoring is not weighted as it is not considered that some indicators have more importance. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding Allocation. A number of other factors such as deliverability need to be taken into consideration. The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report.</td>
<td></td>
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</table>
Further analysis of the merits of each site has been undertaken. This has considered the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.
I would comment as follows:

1. Your title states consultation but the body of the letter implies something very different. It rather arrogantly says 'alternative sites that have been considered and discounted' suggesting a 'fait accompli'. Inviting comments then seems an almost pointless exercise.

2. After attending meetings of the Cowling Action Group (CAG) it strikes me that very few local residents or businesses have ever been contacted never mind consulted. Could you explain why this appears to be the case?

3. I largely support the views of CAG. Their meetings have provided me with the most useful information to date.

4. Your instruction to use an electronic form for respondees from your website for responses discriminates against people who may not have access to a computer or be computer literate. The pdf format is also very poor as it cannot be completed online. I have been assured by the Councillors that this written response will be accepted, please confirm that this is the case.

5. In my view the timescale for responses is unreasonable for proper consultation to take place and I do not believe that you have followed the correct procedure to meet the legal requirements in respect of all Acts of Parliament that are relevant to your proposal. Could you confirm whose legal advice you sought and what specialist knowledge they had before proceeding with this matter in the way you have?

6. The documents referred to on your website are not very user friendly and appear to provide relatively little information that can be readily understood by the layman. They are quite difficult and time consuming to navigate and understand. A cynic could view this as a deliberate ploy. A well structured briefing document in plain English would be far more helpful in understanding how Chorley Council has come to its decision.

7. With the limited information you have made available I find it difficult to make much meaningful comment. However, the grounds for preferred option appear flawed and misleading. For example some of the other sites are considered to be in Green Belt but Cowling Farm is not. Nevertheless the southern access road would have to be in Green Belt. Also statements such as 'buses less than one per hour' are clearly misleading as there are currently only two per week. With such poor quality information I have no confidence that the preferred site has been chosen on the correct grounds.

8. I do not believe the nine sites apparently considered by the Council are the only ones suitable and would like you to explain how you identified such a limited number. As an example I am aware of a further site on Southport Road adjacent to Parklands High School playing fields which clearly has good transport links, appears to have been
vacant for a number of years and has school accessibility.

9. I accept Chorley Council may have a legal obligation to provide a site for Travellers but it must be demonstrated to be the best balanced option in respect of:
   a. The Travellers themselves.
   b. Local businesses and residents.
   c. Value to Chorley ratepayers.
   d. Future development and employment opportunities.

At present I cannot see how your current preferred option satisfies this balance. I would therefore urge you to reconsider your position and extend the timescale to enable a proper consultation to take place that satisfies all relevant Acts of Parliament. I trust you will respond to my specific comments as well as drawing them to the attention of the Planning Inspector.

4(1): Legally compliant?
4(2): Sound?

5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

The 6 week consultation period is consistent with the guidance in the Town and Country Planning (Local Planning) (England) Regulations 2012 and the specific period of consultation was agreed with the Inspector as a timetable to progress the Chorley Local Plan to Examination and adoption. The Council's Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community
involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The representation form and guidance notes provides information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning Policy Framework. In addition to this form the Council has accepted comments by letter and email. A direct link was placed on the homepage of the Council’s website when concerns were raised about the accessibility of the information. The Council also made an online consultation form available through Survey Monkey. The Council considers the process of arriving at an allocation to be legally compliant and sound.

The Cowling Farm site is allocated in the Chorley Local Plan 2012-206 for a mix of housing and employment. This site is not in the Green Belt.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are ‘not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt’. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.
The Council has assessed 8 sites in its ownership and one of which is a preferred site for allocation therefore it does not need to consider the land off Southport Road. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:
• the land is owned by the Council and is deliverable and developable
• a dedicated access is achievable
• the land is within the settlement of Chorley and accessible to services and facilities
• it has the potential to meet the needs of the existing Traveller community at Hut Lane
• the site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• it is sustainable, scoring B and would be compliant with the Core Strategy key policies
• the land is allocated for housing and employment, therefore the principal of housing development is established
I am an 82 year old widow and I have recently come to live with my son and daughter-in-law in the beautiful and unspoilt area of Health Charnock. I now hear that you are planning to build a camp for Gypsy Travellers and a large housing estate. The very idea spells disaster in every way, where is the funding coming from to develop this project? There isn't any money available or so we are told by politicians.

Although you are all pillars of society and leaders of our community, people we can look up to in worrying times, you seem hell bent on destroying the bits of rural beauty we have left. I am sure that there must be more suitable areas for this type of work instead of Cowling Brow, thereby spoiling the rural charm of Heath Charnock and Limbrick.

In conclusion I do hope that you will listen and take some notice of the views of every single person in this area that I have met or spoken to and relocate this camp to a more suitable location.

Comments noted. The site is allocated for a mix housing and employment and is within the settlement of Chorley. The principle of development of this land is therefore established. The Traveller site would be consistent with this allocation in that it will provide for a specific housing need. Cowling Farm is the most expensive option, along with Harrison's Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation Document.

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• the site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• it is sustainable, scoring B and would be compliant with the Core Strategy key policies
• the land is allocated for housing and employment, therefore the principal of housing development is established
I have very recently heard via word of mouth that you are planning to destroy a local beauty spot at the Cowling Farm site with plans to develop the site to house Gypsies and Travellers. I must strongly contest your plans which are fundamentally and seriously flawed throughout every step of the process you have undertaken to conclude that this is your preferred site.

In a short space of time I have read through all the information available on your website about these plans and immediately spotted many errors in your calculations and judgements which should have been based on facts.

The sustainability matrix that places Cowling Farm at the top has not been completed accurately at all. Yarrow Bridge and Cabbage Hall Fields in particular score much higher as preferred sites on the majority of the criteria. You need to stop immediately and correct the matrix in the first instance and reassess your preferred site. Then once you have done that you need to look again at the actual site as you are proposing access to it via Green Belt land off Cowling Road/Weavers Brow. Surely that cannot be allowed at all for any development. This Green Belt land was given to the Council on the grounds that it is used for recreation use only. Again breaking a covenant that surely cannot be allowed.

Cowling is a local beauty spot surrounded by Green Belt and all my family and friends visit the area regularly to walk dogs and visit the area for recreational purposes. The local community here is small and the infrastructure meets these needs only. Long Lane is the main and only road into/out of Cowling and this road doesn't have a footpath for the majority of it and is very narrow, has traffic calming speed bumps and road narrowing to reduce the already too high flow of traffic along it. It has a single track road, very bad bends and a tiny hump back bridge over a beautiful river. How do you possibly expect to have caravans, trailers, vans and even just more cars along this very narrow road that cannot be widened as it is right up to the boundaries of peoples homes?

Many walkers use this route, scouts and local people for walking. There are designated walking areas across all this area and the field you want to use. Do you really think people will be able to continue to walk across a field full of Gypsies?

Also how will you ever stop the site expanding out of control when these people arrive? You will not be able to stop them, it will grow out of control onto local farmers land and everyone who lives in the area will suffer.

I have just about finished converting a barn less than a mile away from this site, literally across the road and I have invested everything I have into doing it and this will ruin my quality of life.

I am outraged at the way this process has been dealt with and I think you need to redo the entire process from start to end as proper protocol has not been followed at all.
Your comparison matrix also says that Yarrow Bridge is Green Belt but it is already a hard standing ready to be moved onto. It is not a pretty site with beautiful gardens and pubs and rivers, it is a derelict site. So why has it been shown as Green Belt? It also states that it is not in a Conservation Area or have listed buildings on it. But Cowling Farm is a listed building and is in a Conservation Area and this is smack bang at the entrance to the proposed site. It also says that we are within 0.8km of an employment site. But where exactly is this? This area is surrounded by Green Belt. The best of all these is EC2. This is laughable if it wasn't so serious. You have said Yarrow Bridge is less than 5km and we are 1.6-3.2km from further/higher education. Yarrow is virtually on the doorstep of Albany High and St George's school. We are nowhere near any schools here at all. I have to drive my children to and from school every day, its too far to walk. Who put this matrix together? Please redo all your assessment accurately.

The process has been done without informing residents and has been manipulated. It is ridiculous that you are thinking of doing this at all.

4(1): Legally compliant?
4(2): Sound?

5(1): Not positively prepared? □
5(2): Not justified? □
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6: Reasons not legally compliant/unsound
7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response

National Planning Practice Guidance states “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.”

The SA scoring is not weighted as it is not considered that some indicators have more importance. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding Allocation. A number of other factors such as deliverability need to be taken into consideration.

The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report.

Further analysis of the merits of each site has been undertaken. This has considered the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that
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Chorley Local Plan Policy ST1: New Provision or Improvement of Footpaths, Cycleways, Bridleways and their associated facilities in existing networks and new development would ensure that pathways are protected.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building.

The Council considers that actual or perceived impact on property value is not a material planning consideration.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
There is no Conservation Area in this locality. Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:

- the contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
- the impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
- how any harm might be removed or reduced
- the impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.

The referred employment site is the industrial area located at the Moorland Gate Business Park.
We do not agree on the Council’s preferred site of Cowling Farm. We object to the site of Cowling Farm for the following reasons:

National Policy:
To respect the interest of the settled community.
Localism Act 2011 requires Councils to notify and consult with the local community. There has been a lack of consultation with the settled community. I know of only 1 letter that’s been sent to the local community at Flag lane. We only became aware of the Council’s proposals for the Gypsy/Travellers site through a leaflet being posted through my letter box by a neighbour.

The Councils Band Spectrum is clearly flawed and biased i.e.:
Cowling Farm - The site has a poor bus service of less than hourly. This is misleading, the bus service is extremely limited with a bus service of only two days a week.
Yarrow Bridge, Economics - The site is over 5km away from further/higher education facilities.
Lancashire college, Southport road, Chorley is only 3.2km away.
Cabbage Hall Fields, Environmental - This is a Greenfield site.
Cowling farm is also a Greenfield site – not noted on the Cowling Farm spectrum band.
Land Adjacent to Northgate Drive, Constraints - There could be a noise issue due to its proximity the M61, for caravans that are more susceptible to noise issues. This also applies to the Cowling Farm site, yet again there is no reference made to the Cowling Farm option.
Comment - The site has poor access to the motorway junction, which is over 3km away.
Yet again this also applies to the Cowling Farm site with no reference made to the Cowling Farm option.
Environmental - The only identified negative environmental effects are that it is a Greenfield site.
Cowling farm site is also a Greenfield site, no reference again.

Yarrow Bridge, Cabbage Hall Fields and the land at Ackhurst Road all score considerably better in the site performance bands than Cowling Farm. The Council does not state WHY they have chosen the Cowling Farm Site!

Reasons for the Cowling Farm not to chosen as an option:

1. Cowling Farm is the most expensive option of the 9 sites considered.

2. The use of Green Belt land for the proposed access road to the site, adjacent to Cowling farm a ‘GRADE II LISTED BUILDING’.

3. The site is too large, 9.5ha could result in the unofficial occupation of the Gypsy/Travelling community, with a risk of over spill on the football, cricket grounds and the Green Belt land adjacent to the site. The Council have not stated how they
would police this issue.

4. Poor transport links, the bus service only runs 2 days a week.

5. Highway concerns - Cowling Road to the South of the site, leads through to Limbrick and Rivington, the road is unsuitable for HGV's and caravans due to the narrow winding road and the single lane bridge at Limbrick. There have been a number of accidents at the mini roundabout at the canal bridge and at the Weavers Brow hairpin bend, already resulting in a loss of life and other casualties. Cowling Brow is treacherous in icy conditions, resulting in HGV's struggling to move on the Brow, making Cowling Brow impassable.

6. Cowling Road is the Gateway from Chorley to the beautiful countryside of Rivington and the West Pennine Moors, it is one of Chorley's greatest assets. It is extremely important to protect the area as much as possible.

7. The Cowling Farm site is a heavily undulating site and has poor drainage, have the Council included these costing’s in the price for the conversion of the site.

I object to the Chorley Council proposal to use Cowling Farm as their preferred site for the Gypsy/ Traveller community for the following reasons:

- The report presented is factually incorrect and misleading.
- Improper use of taxpayers money and loss in value of existing land asset.
- Cause of significant traffic, road safety and health and safety issues.
- Unacceptable manipulation/annexing of Green Belt designated land for site access.
- Damage to the areas rural character - this will promote the ruination of the Chorley gateway to the West Pennine Moors.
- Unacceptable risk that Gypsies from across the North West expand the site/adjacent land to Dale Farm proportions.
- Destruction of development and employment opportunities on Moorland Gate Business Park.
- More appropriate sites can be found elsewhere for much less cost e.g. Hut Lane Travellers want Yarrow Bridge site and planning law suggests that brownfield site (i.e. Yarrow Bridge, Cabbage Hall Fields and Ackhurst Road) should always be used before greenfield.
- Failure by the Council to follow a transparent, fair and proper process e.g. breaching Localism Act 2011, total lack of consultation.
- Damage to community cohesion.
- Impact on The Spinners (reduced customers, jobs etc.).
- Impact on recreational provision i.e. football, cricket, cyclist etc.
- Loss of house sales.
- Lancashire County Council Highways concerns.
- Undulating topography of site.
- Detriment to Grade II listed building and adjacent property.

We require you to take note of all of the above and all the Cowling Action Group representations and petition and change this proposal.
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**Councils response**

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

Comments in respect of inconsistencies are noted. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments. The Council has corrected the inaccurate distance for further/higher education in the Sustainability Appraisal for Yarrow Bridge, this does not affect the overall band of the site.

Proximity to a motorway junction is only one of 42 sustainability indicators and not a deciding factor in the allocation of a permanent Traveller site. It is likely that its significance will be greater in consideration of a transit site which is being progressed in the Council’s Development Plan Document.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy.
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Cowling Farm, as the Council’s preferred site is indicated as being deliverable, however, that is in the context of other sites being potentially deliverable.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no ‘exceptional’ circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The Council has discounted the Cabbage Hall Fields site as a Gypsy and Traveller site because of the changes in the levels on site which are likely to restrict the number of pitches.

The Cowling Farm site allocated in the Chorley Local Plan 2012-206 for a mix of housing and employment is not in the Green Belt. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.

Cowling Farm is the most expensive option, along with Harrison's Farm, but it is considered the most suitable site and is available and achievable. The “cheapest” site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation Document.

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Lancashire County Council (LCC) Highways have provided an updated response (see
Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.
Having resided in the Cowling area for over 10 years we are concerned with the lack of consultation and information with regards to the proposed site for the Gypsy and Traveller community. Having moved to the Cowling area for the picturesque views, quiet location and community environment we feel that this is now under threat and therefore we object to the Chorley Planning proposal to use Cowling Farm as their preferred site for the Gypsy/Traveller community for the following reasons:

Although several sites have been identified, Chorley planning report appears to be biased towards the Cowling site compared to other sites and we feel that the assessments completed on all sites are not up to date information in relation to bus service, education, traffic and also conflictions in relation to Green Belt.

We strongly recommend that Chorley planning review their processes and procedures and look to sites more suitable for the Gypsy/Travelling community on existing brownfield sites and or more accessible sites with nearby facilities that fit the criteria.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the
preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

Comments in respect of inconsistencies are noted. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments. The Council has corrected the inaccurate distance for further/higher education in the Sustainability Appraisal for Yarrow Bridge, this does not affect the overall band of the site.

Proximity to a motorway junction is only one of 42 sustainability indicators and not a deciding factor in the allocation of a permanent Traveller site. It is likely that its significance will be greater in consideration of a transit site which is being progressed in the Council’s Development Plan Document.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Lancashire County Council Education Department contributed to the process of allocation for housing and did not raise any educational issues.

The access to the proposed Gypsy and Traveller site has yet to be finalised.

Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out...
and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.
<table>
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<tr>
<th>Title:</th>
<th>Mr</th>
<th>First Name:</th>
<th>Paul</th>
<th>Last Name:</th>
<th>Walton</th>
<th>Organisation:</th>
<th>PWA Planning</th>
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**Site/location**
1. Cowling Farm

**Paragraph/section**

**Modification**

1: Evidence why available/ suitable/ achievable?  
2: Agree with preferred site? No  
3: Comments on document  
4(1): Legally compliant?  
4(2): Sound? No  
5(1): Not positively prepared? ✓  
5(2): Not justified? ✓  
5(3): Not effective? ✓  
5(4): Not consistent with national policy?  
6: Reasons not legally compliant/unsound  

It is considered that the document fails the tests of soundness on a number of grounds due to considerable flaws in the evidence base and more particularly in the choice of preferred option for the identification of a Gypsy and Traveller site. In particular it has been demonstrated that the plan:

i. has not been positively prepared as it has not been the subject of appropriate community engagement and there are significant gaps in the evidence base.

ii. is not justified as it is plainly not the most appropriate strategy when considered against the reasonable alternatives.

iii. is not effective in that there are considerable doubts about the delivery of the preferred strategy, which do not affect other alternatives.

It is therefore considered that the plan is unsound.

**FULL REPRESENTATION ON FILE**

**7: Necessary changes**  
It is recommended and suggested that the Council review and reconsider the preferred option as set out in the preferred options document and identify the most appropriate site, based on a more thorough and rigorous evidence based assessment. We consider that there is one site which is clearly the most suitable site and which outperforms the others - the Cabbage Hall Fields site. This site should be identified as the most suitable option and a further round of consultation should be undertaken based on this proposal.

**8: Participate in examination?** Yes

**9: Reason participation necessary**  
It is essential that we are able to participate at the Examination to:

i. ensure that the views of interested parties are properly presented to the Inspector;  
ii. ensure that we have adequate opportunity to question the LPA’s assumptions in arriving at their preferred option site.

**Councils response**  
Objection Noted. The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted.
on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan. Comments in respect of inconsistencies are noted and amended. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

The Council has discounted the Cabbage Hall Fields site as a Gypsy and Traveller site because of the changes in the levels on site which are likely to restrict the number of pitches. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key
policies
- The land is allocated for housing and employment, therefore the principal of housing development is established
I write on behalf of FDC Holdings Ltd to express my concerns from a local business perspective to the proposed Gypsy, Traveller and Travelling Showpeople site in the Cowling area of Chorley.

FDC Holdings owns Moorland Gate Business Park immediately adjacent to the proposed site. The feedback I am receiving from our tenants on site is that if the proposed site does go ahead they will either enforce the break clause in their leases when they fall due or they will not renew the lease at the end of the term, whichever comes first. Whether this could be viewed as discriminatory I do not know, I have nothing against the Travelling community, I only know that this is what the businesses on site are telling me - it is fact. It goes without saying that this outcome would seriously damage our business resulting in some job losses or worst case scenario the business would cease trading altogether.

We have owned the Moorland Gate site for 10 years and have worked extremely hard to build a successful business and attract other businesses to the area. The site currently has a very high occupancy and the site employs in the region of 200+ people. We have plans to expand the site in the near future however this would now appear to be extremely unlikely as we feel we would not be able to attract other businesses to our site.

Clearly the mixing of Gypsy and Travellers in a mixed residential and business area will also have a severe impact on both the Council's revenue for the sale of the prime land and the value of the Moorland Gate site. This would severely affect FDC Holding's future borrowings and ability to expand the business. I fear that if the proposed site does go ahead it will be the beginning of the end for businesses in the Cowling area.

I also attach letters (on file) from two independent commercial property agents which confirm their fears that Moorland Gate Business Park will no longer be able to attract new tenants should the proposed site go ahead.
Objection and concerns are noted. The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The Cowling Farm site allocated in the Chorley Local Plan 2012-206 for a mix of housing and employment is not in the Green Belt. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

• Community engagement between the settled and Traveller community.
• The masterplanning process.
• Highways options in relation to the delivery of the mixed use site.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building.
I wish to object to Chorley Council’s decision to name Cowling Farm as the preferred site for allocation as Gypsy and Travelling and strongly object to this site being taken forward as a formal allocation.

There are a number of reasons why I believe there are serious flaws in the performance site indicator, that other sites listed are better options and why Cowling Farm is clearly not the best choice on a number of criteria as detailed below:

1. The document “Chorley Local Plan 2012-2026 Gypsy and Travelling Show People Preferred Options Sustainability Appraisal Supplement” (referred to as the document herein after) states there are no identified negative economic effects in developing this site. However this site is the most expensive site proposed. Utilising the site in this way will limit the use for housing and extension of the industrial estate already agreed, impacting on employment opportunities for the area. Also the mixing of Gypsy and Travellers with residential and business use will have a severe impact on the Council’s revenue from sale of prime Council owned land, and it is extremely unlikely that best market prices will be achieved where the mix is as defined in the plan. Other sites could be developed at lower cost and without loss of opportunity for other use.

2. The area identified is too big and this could easily encourage large numbers of the travelling community to settle illegally, developing a Dale Farm nightmare scenario for Chorley Council to contend with. The environmental damage caused by unauthorised encampment has been witnessed on many Traveller invaded sites across the country. The Council should look to the recommendation of limiting site size and quite clearly ability to do this at such a large site is severely restricted. This would also place undue pressure on local infrastructure and services, if large numbers are able to settle in this area. Other sites are more appropriate in size, limiting the risk that unauthorised expansion could occur, placing additional demands on Chorley BC and local infrastructure.

3. Cowling Brow is already a traffic black spot with the roundabout and area close to the Prince of Wales pub frequently congested by parked cars with lorries unable to pass. Once past the speed bump “chicane”, the road becomes a race track and there have been a number of accidents, including one fatality in recent years. Approaching from Adlington along Long Lane is equally precarious, with a very narrow road, no pavements and a single track bridge and hairpin bend at Limbrick. In winter the icy roads are treacherous and prone to severe conditions. Snow is not cleared and in recent winters the road has been impassable. Other sites are located closer to main routes and do not carry the traffic risks and problems.

4. The proposed access across Green Belt land should not be allowed as this is inappropriate use of the Green Belt. We need to preserve the beautiful Green Belt countryside around Chorley and promote the gateway to the Pennines, and not allow these areas to be snatched in any way. If the site at Hut Lane is to be rejected on these grounds then this should equally apply to the Cowling Site. The Local Plan refers to “Protecting the Green Belt from inappropriate development and strictly limiting new
Traveller sites in the open countryside, away from existing settlements or outside areas allocated in the local plan”. Other sites are outside Green Belt and do not impact Green Belt areas in any way. Yarrow whilst identified as a Green Belt site is already in use by the Council as a depot, and has already been tarmacked and therefore has surely already been effectively reallocated as brownfield.

• The document states that “Cowling Brow is a bus route and there is a bus stop within the recommended 400m walking distance of the site and located about 60m south east of the junction of Cowling Brow and Moorland Gate”. This is a very misleading statement as the bus service is extremely limited, is not regular or efficient with just two buses a WEEK, one in each direction. This can hardly be classed as a sustainable service. Other sites lie on main bus routes with direct routes to further/higher education.

• The document refers to “Higher Education located within 1.6 – 3.2km.” If this is the case and I am not sure it can be, then this must be similar for both the Yarrow and Crosse Hall Sites – Yarrow is certainly closer to Runshaw and lies on one of the many bus routes to this college, whilst Cowling Farm does not. See above.

• This is a heavily undulating site with very poorly drained land, and not suitable for caravans. Again other sites have better landscapes suitable for travelling communities.

• Cowling Farmhouse is Grade II listed. Any development in the vicinity of a grade II listed building should have respect to the building and its surroundings. A Gypsy site is likely to detract from this, and not respect the heritage of this building. Not a factor for other sites.

• The Central Lancashire Core Strategy Policy 1: Locating Growth sets out where development should be located in the Borough. It favours well located brownfield sites. This site at Cowling is greenfield, in open countryside and if located in the southern area as appears to be intended, will be in full view from the roadside. Again not a factor for other sites.

• Finally The Localism Act 2011 requires Councils to both notify and consult local communities in respect of this type of development before publishing proposals. I have not been able to see how CBC has satisfied this requirement. Applicable for the whole process.

I believe there are at least two other sites in the performance schedule which are more appropriate for this use than Cowling – e.g. Yarrow and Cabbage Fields, which will have less effect on the surrounding locality whilst meeting the criteria required better than the Cowling Site, as shown by the sustainability measure and I urge Chorley Council to take my comments into full consideration when reviewing the allocation further, and drop Cowling Farm from the site option list completely.
Cowling Farm is the most expensive option, along with Harrison's Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation Document.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council's proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key policies
- The land is allocated for housing and employment, therefore the principal of housing development is established

The Council considers that actual or perceived impact on property value is not a material planning consideration.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building.

The Cowling Farm site allocated in the Chorley Local Plan 2012-206 for a mix of housing and employment is not in the Green Belt. It is a greenfield site within the settlement of Chorley. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They
identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The undulating topography of the site will be taken account of as part of the masterplanning process for the site. It is considered that some contouring will be required to facilitate the development of the Gypsy and Traveller pitches and the allocation as a whole.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The report provides the necessary detail to allow a comparison with Hut Lane site. Significantly, Hut Lane is a greenfield site in the Green Belt, whereas Yarrow Bridge is a previously developed site in the Green Belt. National Government Guidance - 'Planning for Traveller Sites' - states that Green Belt boundaries should be altered only in exceptional circumstances. However, there is a presumption in favour of sustainable development on previously developed land in the Green Belt subject to a number of criteria set out in Chorley Local Plan 2012-26 Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt. In addition, Hut Lane scores Band D under the sustainability appraisal, making it the least sustainable of all the sites assessed. Yarrow Bridge scores Band B. Hut Lane is located in the Green Belt and in accordance with national policy is discounted because there are no very special circumstances to warrant selection of a site in the Green Belt.

Comments in respect of inconsistencies are noted. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments. The Council has corrected the inaccurate distance for further/higher education in the Sustainability Appraisal for Yarrow Bridge, this does not affect the
overall band of the site. See further analysis of the merits of each site (section 8 of the Proposed Allocation document.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:

- The contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
- The impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
- How any harm might be removed or reduced
- The impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.
1. Cowling Farm

2: Agree with preferred site? No

3: Comments on document

It isn't clear why Cowling Farm has been chosen over the others which scored much higher in the sustainability scoring and seem more suitable overall.

Other sites have been discounted because they are on Green Belt land. Although the Cowling site isn't Green Belt land access to the land may require land to be removed from the Green Belt allocation which goes against the development framework.

The Travellers site will take up a relatively small area of the land at Cowling Farm, this creates the opportunity for other Travellers to set up additional pitches without permission on the adjoining land.

The remaining land is likely to be of reduced value for development as a result of having the Travellers pitches next to it.

One of the constraints stated for the Cabbage Hall Fields site is the fact that it is allocated for housing in the Local Plan and so allocation would result in the replacement of 11 dwellings with 5 Travellers pitches. However the situation is the same for Cowling Farm and some of the other sites, but this isn't mentioned in the Preferred Options document.

4(1): Legally compliant? No

4(2): Sound? No

5(1): Not positively prepared? No

5(2): Not justified? Yes

5(3): Not effective? No

5(4): Not consistent with national policy? No

6: Reasons not legally compliant/unsound

We feel that the Preferred Options document is not justified for several reasons:

Inadequate consultation process - residents of the neighbourhoods affected by the proposed options were not directly notified of the consultation either by letter or by notices being put up in the area. Letters went out to some residents but not all. This meant that many people who wished to respond had very little time as they didn’t know about it until well into the 6 week consultation period.

No clear justification for the preferred site - although indicators for each site have been compared, there is nothing to explain why Cowling Farm has been chosen as the preferred site over others which scored far higher in the sustainability scoring and seem more suitable. Cabbage Hall Fields has scored green on all but 3 indicators yet Cowling has 12 indicators flagged as yellow or orange but has been chosen above Cabbage Hall Fields.

Unsound scoring system - the scoring system does not appear to be sound and has therefore given misleading results. No weighting has been given to the more...
important indicators. For example Ackhurst Road has a red indicator because it is more than 1.2km from a convenience store, yet there is a supermarket which is less than 0.8km away, making the proximity of a convenience store irrelevant.

Inclusion of unsuitable sites in the consultation - the conclusion of unrealistic sites in the options paper means that people are likely to say yes to the Cowling Farm site just to ensure that another site is not chosen rather than because they think Cowling Farm is the most suitable location.

The Traveller community’s suggestions not given any weighting - the Traveller community at Hut Lane have suggested the Yarrow Bridge depot site. This has been discounted but it isn’t clear why. The site is Green Belt and this is the main constraint, but the Cowling Farm option may also involve use of Green Belt land for access. Surely the fact that the Traveller community who have been consulted on this are in support of the Yarrow Bridge site should give it some weighting.

7: Necessary changes

We would want to see a more methodical comparison of the sites taking account the importance of some indicators over others and also a clear explanation of why the Cowling Farm site has been selected as the Council’s preference.

8: Participate in examination?

9: Reason participation necessary

Councils response

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key policies
- The land is allocated for housing and employment, therefore the principal of housing development is established

The Cowling Farm site allocated in the Chorley Local Plan 2012-206 for a mix of housing and employment is not in the Green Belt. It is a greenfield site within the settlement of Chorley. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.
As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

National Planning Practice Guidance states “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.”

The SA scoring is not weighted as it is not considered that some indicators have more importance. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding Allocation. A number of other factors such as deliverability need to be taken into consideration.

The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report.

Further analysis of the merits of each site has been undertaken. This has considered the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.
The Council has looked at sites put forward by the Gypsy and Traveller community as identified at Appendix 2 of the Preferred Options Document. All are in private ownership therefore the Council has no control over the land and cannot ensure deliverability; a number have been granted planning permission; a number are in the Green Belt and are deemed inappropriate development in the Framework and Planning Policy for Traveller Sites; and a number lie within a high risk flood zone. The Council has assessed 8 sites in its ownership and one of which is a preferred site for allocation therefore it did not need to explore the potential for rural exception sites. The Council has also asked other stakeholders with major landholdings whether they have any suitable land available and they have confirmed that they do not have any suitable sites. In addition the Council has looked at site suggested through its "call for sites" for the Local Plan in 2005 and 2007.

The Hut Lane site has been included because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites. A planning Inspector in May 2012 (Appeal Ref: APP/D2320/A11/2159688) confirmed the site is greenfield. The Hut Lane site is not considered suitable for allocation primarily because it has a poor sustainability score - Band D - representing the least sustainable site considered. The report provides the necessary detail to allow a comparison with the Hut Lane site. Significantly, Hut Lane is a greenfield site in the Green Belt. National Government Guidance - 'Planning for Traveller Sites' - states that Green Belt boundaries should be altered only in exceptional circumstances. However, there is a presumption in favour of sustainable development on previously developed land in the Green Belt subject to a number of criteria set out in Chorley Local Plan 2012-26 Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt. Hut Lane is located in the Green Belt and in accordance with national policy is discounted because there are no very special circumstances to warrant selection of a site in the Green Belt.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
I am writing on behalf of Bibbys Farm Scout Camp and Activity Centre. The campsite provides facilities for: Scouts, Guides and children from both schools and churches from Chorley and Bolton. The age range of children visiting Bibbys Farm is from 6yrs to 18yrs but the majority of children are between the ages of 6yrs to 13yrs. The average annual attendance is in access of 4000.

Our Centre is located across the motorway adjacent to the proposed Gypsy and Traveller and Travelling Showpeople’s site at Cowling Farm. A public footpath crossing the motorway via a footbridge links the two sites and continues through our Centre alongside camping areas and activity facilities. The route of the path through the site makes it impracticable for it to be fenced. We have had problems in the past ensuring people using the footpath adhere to it and do not take alternative short cuts through the camp sites and associated buildings. We have also had people illegally camping in the woodland area of our site. If the proposed Travellers site is located at Cowling albeit only initially for 5 pitches, which we believe will grow, it will only exacerbate our concerns associated with safeguarding and security commitments.

We trust you will give due consideration to our concerns / objection in selecting Cowling Farm as a site for Gypsy and Traveller and Travelling Showpeople. It would be tragic to lose the confidence of parents, which is so easy to do in this current child protection climate, and hence stopping their children attending Bibbys Farm, which is providing an excellent service for the young community of Chorley.

Councils response
Objection and concerns noted. As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building.
Having reviewed the Gypsy and Traveller and Travelling Showpeople Preferred Options, June 2014, whilst we have no objections to the principles of the document we have some comments and/or changes which The Coal Authority would like to make or see.

This site is not within the defined Development High Risk Area and is instead located within the Low Risk Area. As such there are no recorded risks within the site that new development will need to take into account.

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I believe there is a significant and growing body of evidence that identifies that Cowling Farm site is NOT available, suitable and achievable due to the factors summarised in section 6 of this representation. This view is based on careful consideration of the Chorley Local Plan 2012 – 26, Gypsy and Travellers and Travelling Showpeople Preferred Options, Statement of Consultation Supplement: Regulation 22, (1) (c) Report and other publically available Council documents. I believe that the publicly available documents and process that the Council has used for a vehicle for decision making are considerably deficient in their preparation. I also believe that there are a number of errors in the Part 2 paper. This is a document that was requested under the FOI and was used as a vehicle for decision making with Councillors. These errors will have therefore misinformed decision makers. Therefore the preferred option MUST NOT be deemed to represent a legally compliant or ‘sound’ proposal and therefore has to be considered unsound. Please see section 6 for specific issues.

There are some key assertions identified in attached and below that identify significant breaches in legal compliancy of the Chorley Council’s ‘Preferred Options Report’. Significant concerns in the consultation approach have been identified that put into question the Councils entire assessment and approach across all sites and comprehensively challenge both the “Legal Compliance” and the “Soundness” of the report ~ against all sub categories identified by the Council (Positively Prepared, Justified, Effective and consistent with National Policy)

I would also like to make it perfectly clear that all points raised in this representation are intended to be non-discriminatory. The issues identified do not challenge the spirit of creating a Gypsy and Traveller site; they do however aim to challenge how Chorley Council has considered its planning analysis and engagement regarding the location(s) of a site of this nature, and indeed any other key developments that impact its local settled communities.

My guiding principles are that any proposals for decision making should be considered in an open, honest, fair, inclusive and transparent way that appropriately recommends a suitable location(s). Any Council recommendation should be objective in its interest (not subjective); make the best use of tax-payers money, support the interest of the local community and thus offer a consistent, well informed and non-prejudiced recommendation.

On this basis I propose the Cowling Farm site is rejected for incongruous reasons and would like to identify that the Council have consequently made the wrong choice in their preferred option. I would therefore request that the Inspector concludes that this entire element of the Chorley Local Plan (CLP) is UNSOUND.

4(1): Legally compliant? No
4(2): Sound? No
5(1): Not positively prepared? ☑
5(2): Not justified? ☐
5(3): Not effective? ☐
5(4): Not consistent with national policy? ☑
The following points act as a high level précis to ‘set out’ and identify key points that the publically available Council document(s) for consideration (and process) are deemed considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or sound proposal.

It must first be noted that the format of this representation form is extremely difficult for a ‘layman’ to complete in line with the aforementioned criteria. Subsequent observations and assertions will try and highlight linkage to the Council’s framework but there are a number of points that appear to cover a number of criteria.

1. In the Council forming its ‘preferred option’ / recommendation I believe the consultation process executed has been inadequate and is in Legal breach of the Localism Act 2011 which requires Councils to both notify and consult local settled communities in respect of this type of development before publishing its proposals (Supporting Evidence also Identified in Appendix 1).
   1.1. The Localism Act 2011 became law on 15th November 2011 when it received Royal assent; breaches of the Act are therefore illegal. As a member of the settled community I do not see any evidence that the Council has taken the Act into account in its decision to identify a preferred site.
   1.2. Further the Council is in breach of the Neighbourhood Planning (General) Regulations 2012 which states that “……before submitting a plan proposal to the local planning authority, a qualifying body must…….publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area”.
   1.3. With above in mind, community engagement should provide an opportunity for everyone to contribute.
   1.3.1. There is growing evidence that there are many residents within the ward who are still not aware of the Council’s proposals and thus feel discriminated against.
   1.3.1.1. The Council has demonstrated significant failure to publicise in an open, transparent and inclusive manner with both its settled and Traveller communities. There has been a distinct lack of appropriate stakeholder notification and meaningful involvement. Despite a number of alleged previous ‘consultation’ periods large sections of the settled community were surprised to recently learn of a ‘preferred’ option having been determined. Particularly speaking as a local resident I was not aware that any options were being considered, and only recently (10th June) found out via word and mouth. I believe that a lack of engagement with interested parties renders the document inconsistent with the requirements of the NPPF.
   1.3.1.2. Furthermore during this latest consultation period there have been examples of inconsistencies towards the Council’s approach to advise residents across the community or local employers for other designated sites, but NO consideration has been made to advise or ‘mail drop’ the local settled community by the Council of its ‘preferred site’. I am aware that Councillors representing other sites in the Chorley area have mail dropped and informed local residents.
   1.3.1.2.1. There is NO clear evidence that the Council’s consultation process has engaged with local employers in the area. Had the Council done so it would have collected clear evidence that employment in the Cowling area of Chorley will be compromised if the Council proceeds with its proposal for its development for Gypsies, Travellers and Travelling Show People. Local entrepreneurs have also mentioned that it would also call into question the success of any future business expansion adjacent to Moorland Gate Business Park.
   1.3.2. The representation form is not user friendly and has been ill considered. There is NO formal statement that other forms of representation are welcomed. There is NO evidence that the Council have considered diversity and inclusion principles to engage with our multi-cultural and multi-linguistic community (no translation of the form has been offered) for anyone wishing to make representation in any other language. Equally the form is not in any way user friendly and thus technically unusable, particularly due to legal references that would scare most individuals from completing
and submitting the form, and categorise their arguments. Even if this form was usable it would discriminate against those who do not have access or are not able to use computers.

1.3.3. This lack of inclusive consultation and the engagement period also precludes any real opportunity to mobilise a “Neighbourhood Plan” or “Neighbourhood Forum” in time for the 16th July timeframe. As a settled member of the community I believe it should be our legal right to achieve this before the closing period of a consultation ~ 6 weeks is simply not enough time.

1.3.4. In my opinion the Council has an obligation to show good practice in all of its operations, however I believe there is no evidence of good practice in community engagement in the preparation of the preferred options document and the channels for responding thereafter. Should best practice community engagement not offer opportunities for everyone to contribute?

1.4. Finally there appears to be ambiguity surrounding how this consultation is being undertaken in accordance with the Councils’ Statement of Community Involvement. There appear to be two documents available:

1.4.1. Statement of Community Involvement adopted in 2006 – which obviously does not take into account and subsequent changes to legislation.

1.4.2. Draft SCI document dated June 2014 - that is yet to be adopted as it is out for consultation and was only made available for public consultation 3 weeks into the current consultation in respect of the Chorley Local Plan 2012-2026 Gypsy and Traveller and Travelling Showpeople Preferred Options June 2014

1.4.3. Why has this not been explained and clearly articulated?

The points below identify concern regarding the Part 2 document (attached in appendix to this representation submission) requested under the Freedom of Information request. All comments directly relate to specific elements of each paragraph where possible and identify how points could be misleading towards Councillors and decision makers.

1. Table 1 page 23 – The size of the Cowling Farm site is erroneously shown as 0.5ha when it is in fact 9.5ha. This huge discrepancy could have led the Councillors to believe they were voting for a small parcel of land that was appropriately sized for the Permanent Gypsy and Traveller site not a significantly large parcel of land that would be impacted by the building of the Permanent Gypsy and Traveller site.

2. Para 20 – This para states that one of the factors taken into account is ‘peaceful and integrated co-existence’ we believe that using Cowling Farm as the preferred option would be detrimental to this policy as the size of the site would makes it susceptible to unauthorised and illegal encroachment and encampment by additional transient Gypsies and Travellers. This would not be an issue for a number of other more viable sites which are of appropriate size and could be managed by CBC and resident permanent Gypsies and Travellers.

3. Para 23 – The costs shown do not reflect the cost of access roads to an adoptable standard. A point that was confirmed by the CBC Head of Planning at a meeting with residents on the 26th June 2014. Again this makes the recommendation unsound as it is based on inaccurate data.

4. Para 24 – CBC considered only 9 sites but 2 of the sites Hut Lane and Crosse Hall Lane were in insufficient size for the proposed site. In addition other possible sites do not appear to have been considered, for example a plot of land off Southport Road identified by Councillor Terence Brown to Cowling residents at a recent meeting. Therefore there appears to have been a lack of rigour to the identification and assessment of viable sites.

5. Para 25 – We do not consider that the preferred option is justifiable due to the lack of ‘proportionate evidence’.

6. Para 27 – The Cowling farm site does not meet this criteria (i.e. not in Green Belt) as the proposed access (ref para 45 and 47) is within the Green Belt.

7. Para 28- This para is both misleading and inconsistent with other parts of the
document as it states ‘it is considered that it is not necessary to allocate a site within the Green Belt’ later (in Para 47) it states that ‘this may require the access road to be removed from the Green Belt’.

8. At best para 28 is misleading but it could be argued that it is in fact untrue.

9. Para 36 – This para is again misleading as it states when comparing Cowling Farm and Cabbage Hall Fields ‘...Cowling Farm access could be made via a dedicated access, and would not be via a residential estate road’ This infers that access to Cabbage Hall Fields would be accessed via a residential estate road whereas it is clear from the preferred option document issued by CBC (page 24 para 1) that Cabbage Hall Fields can be accessed via Chorley North Industrial Park.

10. Again this para is misleading and could have influenced the Councillors recommendation with incorrect information regarding the preferred option.

11. Also in para 3b there is a subjective statement regarding the topography of the sites. In our opinion Cowling Farm also has a challenging topography which I am sure the planning team would confirm.

12. Para 37 – the information contained herein is incomplete in respect of Ackhurst Road maybe not being available. Surely the planning team would have confirmed the facts otherwise why was the site even considered. Another example of the incompleteness of the assessment leading to a flawed recommendation.

13. Para 38 – this is a wholly subjective judgement build on the previously referred to incomplete, erroneous and misleading information. It is unreasonable to refer to ‘the most reasonable site’ without a full and proper evidence trail.

14. Para 42 – this para confirms that the planning team have not completed a full financial assessment of the preferred option. It is our opinion following professional advice that the cost of the Cowling Farm site has been massively under-costed due to the need to build a dedicated access and adoptable road from the site boundary to the proposed site. Again this is seen as erroneous information upon which a decision has been made.

15. Para 45 – The second bullet of this para is wrong as a dedicated access is not achievable from the southern boundary due to;

16. The access point being through Green Belt land that is the subject of a restrictive covenant

17. There being major road safety implications of such a proposed access

18. Para 47 – Again this section omits to mention the covenant that applies to the land next to Cowling farm. This could be misleading to the Councillors as they were not made aware of the covenants. Additionally the para states that there will be no adverse impact on the setting of Cowling Farm. This statement is untrue as building an access road and permanent Gypsy and Traveller site on the boundary of a listed building must have a detrimental impact towards it.

19. General Observation (Not in document) All residential properties on Cowling Road are stone fronted with recent developments on Flag Lane and Bridge Mill Court all being built in keeping with this semi-rural location; trailers by essence could not be said to be in keeping.

7: Necessary changes

Based on all this now publically available information as previously asserted in the last section of this document; the Council’s lack of community engagement; its continuing failure to publicise; its lack of stakeholder notification, its failure to embrace the Localism Act 2011 and the knock-on effect on any future neighbourhood planning are all part of a growing body of evidence that the local settled community has been discriminated against.

These are the most serious of issues and hence I would appreciate that the Council withdraw its Preferred Options Document. The Council should then carry out a thorough open and transparent review of all the points mentioned and all actions carried out in relation to the Preferred Options Document to demonstrate appropriate engagement and legality.
I welcome a revised schedule of deadlines and a corrected and improved engagement process/methodology that reflects best practice be published to enable robust decision making in an open, honest, fair, inclusive and transparent way.

8: Participate in examination? Yes
9: Reason participation necessary There are significant number of observations identified that I feel would benefit from participation in this forum to ensure all key points are appropriately discussed and understood.

Councils response Objection Noted. The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Localism Act also introduced a new right for communities to draw up a neighbourhood plan. Provided a neighbourhood development plan or order is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and with other legal requirements, local people will be able to vote on it in a referendum. If the plan is approved by a majority of those who vote, then the local authority will bring it into force

The representation form and guidance notes provides information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning Policy Framework. In addition to this form the Council has accepted comments by letter and email. A direct link was placed on the homepage of the Council’s website when concerns were raised about the accessibility of the information. The Council also made an online consultation form available through Survey Monkey. The Council considers the process of arriving at an allocation to be legally compliant and sound.

The Council has an adopted Statement of Community Involvement (2006), however this is now out-of-date. The revised draft Statement of Community Involvement has been subject to a 4 week consultation between Monday 30 June and Monday 28 July 2014. The revised SCI has been produced in line with the Town and Country Planning
(Local Planning) (England) Regulations 2012 (as amended) which reflect the reforms set out in the Localism Act 2011, consolidate the changes made to the 2004 Regulations into a single document; and ensure the new regulations are as effective and simple as possible. These include:

• Local planning authorities are required to make information on their planning activity available to their communities as soon as it is ready, and to do so on-line;
• The new regulations prescribe additional bodies that are subject to the ‘duty to co-operate’ under section 110 of the Localism Act 2011.
• The preparation and adoption stages by local planning authorities of development plan documents and supplementary planning documents including as to consultation with interested persons and bodies and the documents which must be made available at each stage.

The SCI also covers the consultation process for when a Neighbourhood Plan application is submitted and the consultation process for the Community Infrastructure Levy Charging Schedule. It is intended the SCI will be approved by Council on 23 September 2014.

The local plan examination has been effectively suspended while the Council considers the allocation of a suitable site for a minimum of five pitches. As such, the formal stages for plan preparation are not restarted. The Council is following the direction and timetable set by the examining inspector.

The reasons for the report to Full Council on 3 June 2014 being a part 2 report were that firstly it contained personal information relating to the children of potential occupants of the site. Secondly the fact that a particular site could potentially be allocated might have had an effect on the value of neighbouring land. In the event that certain sites considered in the report were not approved by members for consultation there would be no public interest in this information being published. However consultation for all sites mentioned in the report was approved on 3 June which meant that the report could then be published.

The Council released the part 2 report on 3rd July 2014 shortly after the Full Council meeting.

The Preferred Options document refers to 9.5 hectares. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

• Community engagement between the settled and Traveller community.
• The masterplanning process.
• Highways options in relation to the delivery of the mixed use site.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The Council has assessed 8 sites in its ownership and one of which is a preferred site for allocation therefore it does not need to consider the land off Southport Road.

The access to the proposed Gypsy and Traveller site has yet to be finalised.

Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served
off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key policies
- The land is allocated for housing and employment, therefore the principal of housing development is established

The site at Cabbage Halls Fields has been discounted as a proposed site, but any proposed access would be from the Chorley North Industrial Park and not Cowslip Way.

Cowling Farm is the most expensive option, along with Harrison’s Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency.

The detailed cost information has been updated - Appendix 5 of the Proposed Allocation document.
The undulating topography of the site will be taken account of as part of the masterplanning process for the site. It is considered that some contouring will be required to facilitate the development of the Gypsy and Traveller pitches and the allocation as a whole.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:

- The contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
- The impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
- How any harm might be removed or reduced
- The impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.
Whilst the principle of locating the Gypsy site at Cowling Farm is accepted, the allocation proposed is 9.5ha in extent and there is therefore considerable uncertainty on where the requirement for 5 pitches would be met, the impact it would have on heritage and ecological considerations and on its access. This uncertainty impacts on the deliverability of the site which is an essential consideration in making the allocation.

The Preferred Options document can be made sound in one of two ways:

1. Refining the allocation to reflect the need for a 0.4ha site to be identified in a location within the wider site where it is compliant with all material planning considerations, including access. This is the only way to be sure that the allocation would be deliverable; or

2. Allocation of another site from high on the sequential list of preferred sites. It is to be noted that the other sites are precisely defined in the documentation. Given the choice of sites within the urban area, sites within the Green Belt should not be allocated.

To provide evidence and discussions that will assist the Inspector in making her conclusion on the proposed modifications.
As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

This site is not an identified Biological Heritage Site, but any development will be assessed against Core Strategy Policy 22: Biodiversity and Geodiversity, which seeks to conserve, protect and seek opportunities to enhance and manage the biological assets of the area, through a series of measures.

Development of this site will also be assessed against Policy BNE9 of the Local Plan, which expands upon Core Strategy Policy 22 and seeks to protect, conserve, restore and enhance biodiversity and ecological network resources.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:

- the contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
- the impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
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The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the
significance embodied therein will be sustained. Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key policies
- The land is allocated for housing and employment, therefore the principal of housing development is established
Title: Mrs First Name: Edna Last Name: Woodrow Organisation: Heath Charnock Parish Coun

Site/location
1. Cowling Farm

Paragraph/section
Modification
1: Evidence why available/suitable/achievable?

2: Agree with preferred site? Yes

3: Comments on document
4(1): Legally compliant? Yes
4(2): Sound? Yes

5(1): Not positively prepared?
5(2): Not justified?
5(3): Not effective?
5(4): Not consistent with national policy?

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response Supported for the allocation of Cowling Farm is noted
I wish to object to Chorley Council’s decision to name Cowling Farm as the preferred site for allocation as Gypsy and Travelling and strongly object to this site being taken forward as a formal allocation.

There are a number of reasons why I believe there are serious flaws in the performance site indicator, that other sites listed are better options and why Cowling Farm is clearly not the best choice on a number of criteria as detailed below:

- The document “Chorley Local Plan 2012-2026 Gypsy and Travelling Show People Preferred Options Sustainability Appraisal Supplement” (referred to as the document herein after) states there are no identified negative economic effects in developing this site. However this site is the most expensive site proposed. Utilising the site in this way will limit the use for housing and extension of the industrial estate already agreed, impacting on employment opportunities for the area. Also the mixing of Gypsy and Travellers with residential and business use will have a severe impact on the Council’s revenue from sale of prime Council owned land, and it is extremely unlikely that best market prices will be achieved where the mix is as defined in the plan. Other sites could be developed at lower cost and without loss of opportunity for other use.

- The area identified is too big and this could easily encourage large numbers of the travelling community to settle illegally, developing a Dale Farm nightmare scenario for Chorley Council to contend with. The environmental damage caused by unauthorised encampment has been witnessed on many Traveller invaded sites across the country. The Council should look to the recommendation of limiting site size and quite clearly ability to do this at such a large site is severely restricted. This would also place undue pressure on local infrastructure and services, if large numbers are able to settle in this area. Other sites are more appropriate in size, limiting the risk that unauthorised expansion could occur, placing additional demands on Chorley BC and local infrastructure.

- Cowling Brow is already a traffic black spot with the roundabout and area close to the Prince of Wales pub frequently congested by parked cars with lorries unable to pass. Once past the speed bump “chicane”, the road becomes a race track and there have been a number of accidents, including one fatality in recent years. Approaching from Adlington along Long Lane is equally precarious, with a very narrow road, no pavements and a single track bridge and hairpin bend at Limbrick. In winter the icy roads are treacherous and prone to severe conditions. Snow is not cleared and in recent winters the road has been impassable. Other sites are located closer to main routes and do not carry the traffic risks and problems.

- The proposed access across Green Belt land should not be allowed as this is inappropriate use of the Green Belt. We need to preserve the beautiful Green Belt countryside around Chorley and promote the gateway to the Pennines, and not allow these areas to be snatched in any way. If the site at Hut Lane is to be rejected on these grounds then this should equally apply to the Cowling Site. The Local Plan refers to “Protecting the Green Belt from inappropriate development and strictly limiting new
Traveller sites in the open countryside, away from existing settlements or outside areas allocated in the local plan”. Other sites are outside Green Belt and do not impact Green Belt areas in any way. Yarrow whilst identified as a Green Belt site is already in use by the Council as a depot, and has already been tarmacked and therefore has surely already been effectively reallocated as brownfield.

- The document states that “Cowling Brow is a bus route and there is a bus stop within the recommended 400m walking distance of the site and located about 60m south east of the junction of Cowling Brow and Moorland Gate”. This is a very misleading statement as the bus service is extremely limited, is not regular or efficient with just two buses a WEEK, one in each direction. This can hardly be classed as a sustainable service. Other sites lie on main bus routes with direct routes to further/higher education.

- The document refers to “Higher Education located within 1.6 – 3.2km.” If this is the case and I am not sure it can be, then this must be similar for both the Yarrow and Crosse Hall Sites – Yarrow is certainly closer to Runshaw and lies on one of the many bus routes to this college, whilst Cowling Farm does not. See above.

- This is a heavily undulating site with very poorly drained land, and not suitable for caravans. Again other sites have better landscapes suitable for travelling communities.

- Cowling Farmhouse is Grade II listed. Any development in the vicinity of a grade II listed building should have respect to the building and its surroundings. A Gypsy site is likely to detract from this, and not respect the heritage of this building. Not a factor for other sites.

- The Central Lancashire Core Strategy Policy 1: Locating Growth sets out where development should be located in the Borough. It favours well located brownfield sites. This site at Cowling is greenfield, in open countryside and if located in the southern area as appears to be intended, will be in full view from the roadside . Again not a factor for other sites.

- Finally The Localism Act 2011 requires Councils to both notify and consult local communities in respect of this type of development before publishing proposals. I have not been able to see how CBC has satisfied this requirement. Applicable for the whole process.

The fact that local residents were given no notice of a dramatic change to the local landscape seems to have been dismissed by the Council planning officers yet in the past the Council have extended the time for consultation on the building of extensions in town purely on the basis of neighbours not receiving notification. The impression is that this has been done in an underhand way with consultation with only the Travellers. The financial loss, although not a consideration for planning is so great for residents that it means there is no alternative but to object and continue arguing against the proposal. The fact that the conclusions reached in the consultation document are flawed leaves the Council open to claims by the residents of Chorley if an inappropriate site is chosen.

4(1): Legally compliant? □
4(2): Sound? □
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
Cowling Farm is the most expensive option, along with Harrison’s Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation Document.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key policies
- The land is allocated for housing and employment, therefore the principal of housing development is established

The Council considers that actual or perceived impact on property value and businesses is not a material planning consideration.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety. Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building.

The Cowling Farm site allocated in the Chorley Local Plan 2012-206 for a mix of housing and employment is not in the Green Belt. It is a greenfield site within the settlement of Chorley. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- Community engagement between the settled and Traveller community.
- The masterplanning process.
The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31-32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The undulating topography of the site will be taken account of as part of the masterplanning process for the site. It is considered that some contouring will be required to facilitate the development of the Gypsy and Traveller pitches and the allocation as a whole.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The report provides the necessary detail to allow a comparison with Hut Lane site. Significantly, Hut Lane is a greenfield site in the Green Belt, whereas Yarrow Bridge is a previously developed site in the Green Belt. National Government Guidance - 'Planning for Traveller Sites' - states that Green Belt boundaries should be altered only in exceptional circumstances. However, there is a presumption in favour of sustainable development on previously developed land in the Green Belt subject to a number of criteria set out in Chorley Local Plan 2012-26 Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt. In addition, Hut Lane scores Band D under the sustainability appraisal, making it the least sustainable of all the sites assessed. Yarrow Bridge scores Band B. Hut Lane is located in the Green Belt and in accordance with national policy is discounted because there are no very special circumstances to warrant selection of a site in the Green Belt.

Comments in respect of inconsistencies are noted. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. In relation to the Yarrow Bridge site, the distance to further/higher
education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments. The Council has corrected the inaccurate distance for further/higher education in the Sustainability Appraisal for Yarrow Bridge, this does not affect the overall band of the site. (See also analysis in section 8 of the Proposed Allocation document.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:

- the contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
- the impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
- how any harm might be removed or reduced
- the impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community
involvement into their development programme to allow for enough time to be
devoted to involve the community in a particular scheme (The Statement of
Community Involvement provides additional information on pre-application
discussions). Should any application be forthcoming the Council will include
appropriate pre-application community consultation.
This option affects Chorley Footpaths 5 and 4 which go through the 9+ hectare site (admittedly only 0.4 Hectares is for the Gypsies). These footpaths link to an extensive network accessing the West Pennine Moors and any interference with them would be detrimental to walking in this area. So we would not wish to support this site selection and indeed object to it.

Offices response

Objection noted. The site is an employment allocation in the adopted Local Plan and is allocated for both housing and employment in the emerging Chorley Local Plan 2012-26. Policy ST1 covers new provision or improvement of footpaths and their associated facilities in existing networks and new developments. Proposals should provide for the retention or appropriate diversion of existing footpaths.
I do not believe that the Cowling Farm site is available, suitable and achievable due to the factors summarised in section 6 of this representation and the significant growing body of evidence. This evidence and information has been extracted from documents supplied by CBC primarily in response to FOI requests. This view is also based on careful consideration of the Preferred Options document, Statement of Consultation and other publically available documents as well as a number of inaccuracies, statements that could be misleading and inconsistencies contained within the restricted paper prepared by CBC planning team and submitted to Councillors and considered at the CBC meeting of 3rd June 2014 (the ‘Part2’ paper). I believe that the publicly available documents that the Council has used as a vehicle for decision making are considerably deficient in their preparation and are therefore not deemed to represent a legally compliant or sound proposal. Also as there are a number of errors in the Part2 paper I believe that the recommendation to Councillors was unsound and therefore the preferred option has to be considered unsound. Please see section 6 for the specific issues.

I believe that the Preferred option document and the Part2 document are unsound. There are some key assertions identified in attached and below that identify significant breaches in legal compliancy of the Chorley Council’s ‘Preferred Options Report’. Significant concerns in the consultation approach have been identified that put into question the Councils entire assessment and approach across all sites and comprehensively challenge both the “Legal Compliance” and the “Soundness” of the report ~ against all sub categories identified by the Council (Positively Prepared, Justified, Effective and consistent with National Policy)

I would also like to make it perfectly clear that all points raised in this representation are intended to be non-discriminatory. The issues identified do not challenge the spirit of creating a Gypsy and Traveller site; they do however aim to challenge how Chorley Council has considered its planning analysis and engagement regarding the location(s) of a site of this nature, and indeed any other key developments that impact its local settled communities.

My guiding principles are that any proposals for decision making should be considered in an open, honest, fair, inclusive and transparent way that appropriately recommends a suitable location(s). Any Council recommendation should be objective in its interest (not subjective); make the best use of tax-payers money, support the interest of the local community and thus offer a consistent, well informed and non-prejudiced recommendation.

On this basis I propose the Cowling Farm site is rejected for incongruous reasons and would like to identify that the Council have consequently made the wrong choice in their preferred option. I would therefore request that the Inspector concludes that this entire element of the Chorley Local Plan (CLP) is UNSOUND.

4(1): Legally compliant? No
Due to a number of factors the proposed access at Cowling Farm is not suitable, deliverable and achievable as a permanent Gypsy site. This information has been extracted from the Chorley Borough Council (CBC) preferred option document and ‘part 2’ confidential report provided subsequent to FOI requests and other responses provided to additional FOI requests.

Access to Cowling Farm is not viable due to factors including appropriate land use, covenants applying to the land and road safety issues as summarised below;

1. The recommended access (ref Part 2 paper para 45 and 47) is from the southern boundary of the site off Cowling Road/Weavers Brow.
2. This would not be possible due to the proposed access being through Green Belt land and as the referenced documents have indicated in a number of places the use of Green Belt land for a permanent Gypsy and Traveller site would be according to Government guidance an inappropriate development.
3. Furthermore the Green Belt land at the southern boundary of the site off Cowling Road/Weavers Brow is subject to a restrictive covenant that CBC were apparently unaware of that restricts the use of this land for recreation purposes only as confirmed by CBC in response to a recent FOI request and detailed in the attached document 3 14-378.
4. It appears from an indicative map provided by CBC to Councillor Kim Snape that the ‘potential southern access is being considered not on the Council owned Green Belt land but by utilising the garden of the listed Cowling Farm.
5. The possible use of the garden of Cowling Farm is not deliverable as this land is not owned by CBC
6. Additionally this southern access, even if it were viable from a land use viewpoint would have a serious detrimental impact on the listed Cowling Farm and its setting again contrary to government guidance.
7. In addition to the Green Belt and land ownership issues there are serious concerns regarding the impact on road safety for residents and road users of trying to use the southern access.
8. From documents supplied by CBC there have only been cursory contact with Lancashire County Council highways about the viability of the southern access and this has confirmed (Pages 17 and 18 of the GTTSP) a possible objection to the proposal to develop Cowling Farm from Lancashire County Council (Lancashire County Council) Highways. It is stated that in respect of Cowling Brow “there have been no less than 10 recorded slight personal injury traffic accidents in the past 5 years at different locations of its length. Two of these accidents were recorded as serious. If the accident review cannot be undertaken and the additional safety measures implemented then, Highways would seek to object to the proposed site”.
9. The southern access is therefore also not deliverable from a road safety and Lancashire County Council highways viewpoint.

Table 1 page 23 – The size of the Cowling Farm site is erroneously shown as 0.5ha when it is in fact 9.5ha. This huge discrepancy could have led the Councillors to believe they were voting for a small parcel of land that was appropriately sized for the Permanent Gypsy and Traveller site not a significantly large parcel of land that would be impacted by the building of the Permanent Gypsy and Traveller site.

Para 20 – This para states that one of the factors taken into account is ‘peaceful and
integrated co-existence’ we believe that using Cowling Farm as the prefer option would be detrimental to this policy as the size of the site would make it susceptible to unauthorised and illegal encroachment and encampment by additional transient Gypsies and Travellers. This would not be an issue for a number of other more viable sites which are of appropriate size and could be managed by CBC and resident permanent Gypsies and Travellers.

Para 23 – The costs shown do not reflect the cost of access roads to an adoptable standard. A point that was confirmed by the CBC Head of Planning at a meeting with residents on the 26th June 2014. Again this makes the recommendation unsound as it is based on inaccurate data.

Para 24 – CBC considered only 9 sites but 2 of the sites Hut Lane and Crosse Hall Lane were in insufficient size for the proposed site. In addition other possible sites do not appear to have been considered, for example a plot of land off Southport Road identified by Councillor Terence Brown to Cowling residents at a recent meeting. Therefore there appears to have been a lack of rigour to the identification and assessment of viable sites.

Para 25 – We do not consider that the preferred option is justifiable due to the lack of ‘proportionate evidence’.

Para 27 – The Cowling farm site does not meet this criteria (i.e. not in Green Belt) as the proposed access (ref para 45 and 47) is within the Green Belt.

Para 28 - This para is both misleading and inconsistent with other parts of the document as it states ‘it is considered that it is not necessary to allocate a site within the Green Belt’ later (in Para 47) it states that ‘this may require the access road to be removed from the Green Belt’.

At best para 28 is misleading but it could be argued that it is in fact untrue.

Para 36 – This para is again misleading as it states when comparing Cowling Farm and Cabbage Hall fields ‘...Cowling Farm access could be made via a dedicated access, and would not be via a residential estate road’ This infrers that access to Cabbage Hall Fields would be accessed via a residential estate road whereas it is clear from the preferred option document issued by CBC (page 24 para 1) that Cabbage Hall Fields can be accessed via Chorley North Industrial Park. Again this para is misleading and could have influenced the Councillors recommendation with incorrect information regarding the preferred option.

Also in para 3b there is a subjective statement regarding the topography of the sites. In our opinion Cowling Farm also has a challenging topography which I am sure the planning team would confirm.

Para 37 – the information contained herein is incomplete in respect of Ackhurst Road maybe not being available. Surely the planning team would have confirmed the facts otherwise why was the site even considered. Another example of the incompleteness of the assessment leading to a flawed recommendation.

Para 38 – this is a wholly subjective judgement build on the previously referred to incomplete, erroneous and misleading information. It is unreasonable to refer to ‘the most reasonable site’ without a full and proper evidence trail.

Para 42 – this para confirms that the planning team have not completed a full financial assessment of the preferred option. It is our opinion following professional advice that the cost of the Cowling Farm site has been massively under-costed due to the need to build a dedicated access and adoptable road from the site boundary to the proposed site. Again this is seen as erroneous information upon which a decision has been made.

Para 45 – The second bullet of this para is wrong as a dedicated access is not achievable from the southern boundary due to;

- The access point being through Green Belt land that is the subject of a restrictive covenant
- There being major road safety implications of such a proposed access

Para 47 – Again this section omits to mention the covenant that applies to the land next to Cowling farm. This could be misleading to the Councillors as they were not made aware of the covenants. Additionally the para states that there will be no adverse impact on the setting of Cowling Farm. This statement is untrue as building an
access road and permanent Gypsy and Traveller site on the boundary of a listed building must have a detrimental impact.

The following points act as a high level précis to ‘set out’ and identify key points that the publically available Council document(s) for consideration (and process) are deemed considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or sound proposal.

It must first be noted that the format of this representation form is extremely difficult for a ‘layman’ to complete in line with the aforementioned criteria. Subsequent observations and assertions will try and highlight linkage to the Council’s framework but there are a number of points that appear to cover a number of criteria.

1. In the Council forming its ‘preferred option’ / recommendation I believe the consultation process executed has been inadequate and is in Legal breach of the Localism Act 2011 which requires Councils to both notify and consult local settled communities in respect of this type of development before publishing its proposals (Supporting Evidence also Identified in Appendix 1).

1.1. The Localism Act 2011 became law on 15th November 2011 when it received Royal assent; breaches of the Act are therefore illegal. As a member of the settled community I do not see any evidence that the Council has taken the Act into account in its decision to identify a preferred site.

1.2. Further the Council is in breach of the Neighbourhood Planning (General) Regulations 2012 which states that “……before submitting a plan proposal to the local planning authority, a qualifying body must……..publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area”.

1.3. With above in mind, community engagement should provide an opportunity for everyone to contribute.

1.3.1. There is growing evidence that there are many residents within the ward who are still not aware of the Council’s proposals and thus feel discriminated against.

1.3.1.1. The Council has demonstrated significant failure to publicise in an open, transparent and inclusive manner with both its settled and Traveller communities. There has been a distinct lack of appropriate stakeholder notification and meaningful involvement. Despite a number of alleged previous ‘consultation’ periods large sections of the settled community were surprised to recently learn of a ‘preferred’ option having been determined. Particularly speaking as a local resident I was not aware that any options were being considered, and only recently (10th June) found out via word and mouth. I believe that a lack of engagement with interested parties renders the document inconsistent with the requirements of the NPPF.

1.3.1.2. Furthermore during this latest consultation period there have been examples of inconsistencies towards the Council’s approach to advise residents across the community or local employers for other designated sites, but NO consideration has been made to advise or ‘mail drop’ the local settled community by the Council of its ‘preferred site’. I am aware that Councillors representing other sites in the Chorley area have mail dropped and informed local residents.

1.3.1.2.1. There is NO clear evidence that the Council’s consultation process has engaged with local employers in the area. Had the Council done so it would have collected clear evidence that employment in the Cowling area of Chorley will be compromised if the Council proceeds with its proposal for its development for Gypsies, Travellers and Travelling Show People. Local entrepreneurs have also mentioned that it would also call into question the success of any future business expansion adjacent to Moorland Gate Business Park.

1.3.2. The representation form is not user friendly and has been ill considered. There is NO formal statement that other forms of representation are welcomed. There is NO evidence that the Council have considered diversity and inclusion principles to engage with our multi-cultural and multi-linguistic community (no translation of the form has
been offered) for anyone wishing to make representation in any other language. Equally the form is not in any way user friendly and thus technically unusable, particularly due to legal references that would scare most individuals from completing and submitting the form, and categorise their arguments. Even if this form was usable it would discriminate against those who do not have access or are not able to use computers.

1.3.3. This lack of inclusive consultation and the engagement period also precludes any real opportunity to mobilise a “Neighbourhood Plan” or “Neighbourhood Forum” in time for the 16th July timeframe. As a settled member of the community I believe it should be our legal right to achieve this before the closing period of a consultation ~ 6 weeks is simply not enough time.

7: Necessary changes

The Preferred Option document needs to be revised to identify a site that is suitable, deliverable and achievable.

Based on all this now publically available information as previously asserted in the last section of this document; the Council’s lack of community engagement; its continuing failure to publicise; its lack of stakeholder notification, its failure to embrace the Localism Act 2011 and the knock-on effect on any future neighbourhood planning are all part of a growing body of evidence that the local settled community has been discriminated against.

These are the most serious of issues and hence I would appreciate that the Council withdraw its Preferred Options Document. The Council should then carry out a thorough open and transparent review of all the points mentioned and all actions carried out in relation to the Preferred Options Document to demonstrate appropriate engagement and legality.

I welcome a revised schedule of deadlines and a corrected and improved engagement process/methodology that reflects best practice be published to enable robust decision making in an open, honest, fair, inclusive and transparent way.

8: Participate in examination?  

No

9: Reason participation necessary

Objection Noted. The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to
publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Localism Act also introduced a new right for communities to draw up a neighbourhood plan. Provided a neighbourhood development plan or order is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and with other legal requirements, local people will be able to vote on it in a referendum. If the plan is approved by a majority of those who vote, then the local authority will bring it into force.

The representation form and guidance notes provides information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning Policy Framework. In addition to this form the Council has accepted comments by letter and email. A direct link was placed on the homepage of the Council’s website when concerns were raised about the accessibility of the information. The Council also made an online consultation form available through Survey Monkey. The Council considers the process of arriving at an allocation to be legally compliant and sound.

The Council has an adopted Statement of Community Involvement (2006), however this is now out-of-date. The revised draft Statement of Community Involvement has been subject to a 4 week consultation between Monday 30 June and Monday 28 July 2014. The revised SCI has been produced in line with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which reflect the reforms set out in the Localism Act 2011, consolidate the changes made to the 2004 Regulations into a single document; and ensure the new regulations are as effective and simple as possible. These include:

- Local planning authorities are required to make information on their planning activity available to their communities as soon as it is ready, and to do so on-line;
- The new regulations prescribe additional bodies that are subject to the ‘duty to co-operate’ under section 110 of the Localism Act 2011.
- The preparation and adoption stages by local planning authorities of development plan documents and supplementary planning documents including as to consultation with interested persons and bodies and the documents which must be made available at each stage.

The SCI also covers the consultation process for when a Neighbourhood Plan application is submitted and the consultation process for the Community Infrastructure Levy Charging Schedule. It is intended the SCI will be approved by Council on 23 September 2014.

The local plan examination has been effectively suspended while the Council considers the allocation of a suitable site for a minimum of five pitches. As such, the formal stages for plan preparation are not restarted. The Council is following the direction and timetable set by the examining inspector.

The reasons for the report to Full Council on 3 June 2014 being a part 2 report were that firstly it contained personal information relating to the children of potential occupants of the site. Secondly the fact that a particular site could potentially be allocated might have had an effect on the value of neighbouring land. In the event that certain sites considered in the report were not approved by members for consultation there would be no public interest in this information being published. However consultation for all sites mentioned in the report was approved on 3 June which meant that the report could then be published. The Council released the part 2 report on
3rd July 2014 shortly after the Full Council meeting.

The Preferred Options document refers to 9.5 hectares. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:
• Community engagement between the settled and Traveller community.
• The masterplanning process.
• Highways options in relation to the delivery of the mixed use site.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The Council has assessed 8 sites in its ownership and one of which is a preferred site for allocation therefore it does not need to consider the land off Southport Road.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are ‘not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt’. These include ‘local transport infrastructure which can demonstrate a requirement for a Green Belt location.’ In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The Council do not intend to access the land at Cowling Farm through the curtilage/garden of Cowling Farm which is listed and not in their ownership.

The Council’s indicative layout provided to representors by Cllr Kim Snape was prepared by the Council to show the size of an 0.4 hectare site.

The information provided by Lancashire County Council Highways on traffic accidents is fact.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The
analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:
• the land is owned by the Council and is deliverable and developable
• a dedicated access is achievable
• the land is within the settlement of Chorley and accessible to services and facilities
• it has the potential to meet the needs of the existing Traveller community at Hut Lane
• the site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• it is sustainable, scoring B and would be compliant with the Core Strategy key policies
• the land is allocated for housing and employment, therefore the principal of housing development is established

The site at Cabbage Halls Fields has been discounted as a preferred site, but any proposed access would be from the Chorley North Industrial Park and not Cowslip Way.

Cowling Farm is the most expensive option, along with Harrison’s Farm, but it is considered the most suitable site and is available and achievable. The “cheapest” site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation Document.

The undulating topography of the site will be taken account of as part of the masterplanning process for the site. It is considered that some contouring will be required to facilitate the development of the Gypsy and Traveller pitches and the allocation as a whole.
I believe there is a significant and growing body of evidence that identifies that Cowling Farm site is NOT available, suitable and achievable due to the factors summarised in section 6 of this representation. This view is based on careful consideration of the Chorley Local Plan 2012 – 26, Gypsy and Traveller's and Travelling Show people Preferred Options, Statement of Consultation Supplement: Regulation 22, (1) (c) Report and other publically available Council documents. I believe that there are a number of errors in the Part 2 paper. This is a document that was requested under the FOI and was used as a vehicle for decision making with Councillors. These errors will have therefore misinformed decision makers. I believe that the publically available documents and process that the Council has used as a vehicle for decision making are considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or ‘sound’ proposal and therefore the preferred option has to be considered unsound.

2: Agree with preferred site?
No

3: Comments on document
There are some key assertions identified in attached and below that identify significant breaches in legal compliance of the Chorley Council’s ‘Preferred Options Report’. Significant concerns in the consultation approach have been identified that put into question the Councils entire assessment and approach across all sites and comprehensively challenge both the “Legal Compliance” and the “Soundness” of the report ~ against all sub categories identified by the Council (Positively Prepared, Justified, Effective and consistent with National Policy)

I would also like to make it perfectly clear that all points raised in this representation are intended to be non-discriminatory. The issues identified do not challenge the spirit of creating a Gypsy and Traveller site; they do however aim to challenge how Chorley Council has considered its planning analysis and engagement regarding the location(s) of a site of this nature, and indeed any other key developments that impact its local settled communities.

My guiding principles are that any proposals for decision making should be considered in an open, honest, fair, inclusive and transparent way that appropriately recommends a suitable location(s). Any Council recommendation should be objective in its interest (not subjective); make the best use of tax-payers money, support the interest of the local community and thus offer a consistent, well informed and non-prejudiced recommendation.

On this basis I propose the Cowling Farm site is rejected for incongruous reasons and would like to identify that the Council have consequently made the wrong choice in their preferred option. I would therefore request that the inspector concludes that this entire element of the Chorley Local Plan (CLP) is UNSOUND.
The following points act as a high level précis to ‘set out’ and identify key points that the publically available Council document(s) for consideration (and process) are deemed considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or sound proposal.

It must first be noted that the format of this representation form is extremely difficult for a ‘layman’ to complete in line with the aforementioned criteria. Subsequent observations and assertions will try and highlight linkage to the Council’s framework but there are a number of points that appear to cover a number of criteria.

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1.1. The Localism Act 2011 became law on 15th November 2011 when it received Royal assent; breaches of the Act are therefore illegal. As a member of the settled community I do not see any evidence that the Council has taken the Act into account in its decision to identify a preferred site.

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1.3. With above in mind, community engagement should provide an opportunity for everyone to contribute.

1.3.1. There is growing evidence that there are many residents within the ward who are still not aware of the Council’s proposals and thus feel discriminated against.

1.3.1.1. The Council has demonstrated significant failure to publicise in an open, transparent and inclusive manner with both its settled and Traveller communities. There has been a distinct lack of appropriate stakeholder notification and meaningful involvement. Despite a number of alleged previous ‘consultation’ periods large sections of the settled community were surprised to recently learn of a ‘preferred’ option having been determined. Particularly speaking as a local resident I was not aware that any options were being considered, and only recently (10th June) found out via word and mouth. I believe that a lack of engagement with interested parties renders the document inconsistent with the requirements of the NPPF.

1.3.1.2. Furthermore during this latest consultation period there have been examples of inconsistencies towards the Council’s approach to advise residents across the community or local employers for other designated sites, but NO consideration has been made to advise or ‘mail drop’ the local settled community by the Council of its ‘preferred site’. I am aware that Councillors representing other sites in the Chorley area have mail dropped and informed local residents.

1.3.1.2.1. There is NO clear evidence that the Council’s consultation process has engaged with local employers in the area. Had the Council done so it would have collected clear evidence that employment in the Cowling area of Chorley will be compromised if the Council proceeds with its proposal for its development for Gypsies, Travellers and Travelling Show People. Local entrepreneurs have also mentioned that it would also call into question the success of any future business expansion adjacent to Moorland Gate Business Park.

1.3.2. The representation form is not user friendly and has been ill considered. There is NO formal statement that other forms of representation are welcomed. There is NO evidence that the Council have considered diversity and inclusion principles to engage with our multi-cultural and multi-linguistic community (no translation of the form has been offered) for anyone wishing to make representation in any other language. Equally the form is not in any way user friendly and thus technically unusable, particularly due to legal references that would scare most individuals from completing
and submitting the form, and categorise their arguments. Even if this form was usable it would discriminate against those who do not have access or are not able to use computers.

1.3.3. This lack of inclusive consultation and the engagement period also precludes any real opportunity to mobilise a “Neighbourhood Plan” or “Neighbourhood Forum” in time for the 16th July timeframe. As a settled member of the community I believe it should be our legal right to achieve this before the closing period of a consultation ~ 6 weeks is simply not enough time.

1.3.4. In my opinion the Council has an obligation to show good practice in all of its operations, however I believe there is no evidence of good practice in community engagement in the preparation of the preferred options document and the channels for responding thereafter. Should best practice community engagement not offer opportunities for everyone to contribute?

1.4. Finally there appears to be ambiguity surrounding how this consultation is being undertaken in accordance with the Councils’ Statement of Community Involvement. There appear to be two documents available:

1.4.1. Statement of Community Involvement adopted in 2006 – which obviously does not take into account and subsequent changes to legislation.

1.4.2. Draft SCI document dated June 2014 - that is yet to be adopted as it is out for consultation and was only made available for public consultation 3 weeks into the current consultation in respect of the Chorley Local Plan 2012-2026 Gypsy and Traveller and Travelling Showpeople Preferred Options June 2014

1.4.3. Why has this not been explained and clearly articulated?

The following is considered from a Taxpayer, homeowner and local community member’s perspective.

1. From a taxpayers perspective – I work on the assumption that you (the Council) will ensure you do everything in your power to ensure informed decisions are made based on the best interest of ALL our local community that you represent. Equally, when you are making principal planning decisions that directly impact me as a taxpayer you will proactively engage and involve me to ensure I am appraised of any decision prior to a recommendation being made.

1.1. Particularly if a ‘recommendation’ you wish to formally present directly impacts my locality and a decision and consequence of which is one I will have to live with for years to come. We all have Human Rights which should be respected and it is not fair or just to sacrifice the welfare and rights of existing residents upon the altar of current political directives.

2. In your analytical analysis towards each proposed site location I do not see any evidence of consideration towards the through-life and longevity implications of your proposal.

2.1.1. Whilst I do see superficial evidence with regards to a comparison of how each site fairs against another based on a set of parochial and highly specific criteria. Neither consideration nor comparison is evident of how each site compare’s against other key factors that I would anticipate are key to advise any form of decision making of this gravity that impacts hundreds of members of our community.

2.1.2. There is NO consideration towards ‘through-life’ criteria that would consider ‘long term benefit’ or ‘strategic benefit’, and thus linkage to values or Council principles, impact to key stakeholders, or ‘holistic costing’ of a proposal such as this.

2.1.2.1. For example:

2.1.2.1.1. The ‘through-life’ Management of a particular site for example should analyse how well each site is naturally contained (i.e. via natural boundaries), or how well the site lends itself towards restricting illegal site expansion. I notice the proposal document states a ‘minimum of 5 pitches’ what does this mean? The scoring criteria must clearly articulate this to ensure decision makers understand the sub factors and thus gravity of their decisions. Criteria of this kind will help ensure the planning team can demonstrate clear and transparent decision making.

2.1.2.1.2. Other Considerations of this ethos should also be towards sustainability of a
site, the benefit towards the tax payer, Council revenue, the alignment to Council strategic objectives or policies, principles, through-life estimate of costs, etc. In essence any factor that will be used to inform its decision and ensure that it can demonstrate it hasn’t manipulated a narrow and parochial set of factors towards a perceived ‘fait accompli’. It is also considered that the current process to date is subject to irregularity and therefore judicial review.

2.1.2.2. To make a recommendation that influences a decision of this gravity ~ The planning team should have prepared a more comprehensive and holistic appraisal.

2.1.2.3. A 2010 Council document identified Yarrow Bridge as a preferred site by the local travelling community. This has not been taken into consideration in the recent scoring criteria.

2.1.2.4. Through this consultation process there have been irregularities amongst the Councils approach to engage its community where some Councillors have chosen to ‘mail drop’ their ward and others have not or have not had capacity to do so. Given the alleged up front planning of this consultation, appropriate guidance has not been given to Councillors and appropriate capacity allocated to consistently support robust community engagement.

2.2. Ambiguity surrounding how this consultation is being undertaken in accordance with the Councils’ Statement of Community Involvement. There appear to be two documents available one published in 2006 and one in 2014

2.2.1. This has not been explained and clearly articulated.

3. Recent empirical evidence has also identified a loss of housing sale on Cowling Road due to the site being a preferred option. Thus identifying a clear need to consider impact towards housing value as a direct result of any development of this site.

4. General Observation: It appears that detailed consultation should have taken place before any concrete proposals were presented to the settled community? I can’t find any specific document other than the Statement of Community Involvement which has recently been posted on the Council website during this consultation process and is currently in Draft (also see point 2.2)

5. As the interests of the settled community are paramount, communication on this issue seems to have been left to a late stage in the proceedings - very few residents seem to have been issued with a copy of the planning notification. It could be interpreted that this is because you wish to avoid the number of adverse comments being received by the consultation deadline of July 16th. On matters as crucial as this, the information process should be a transparent, fair and proper one.

The points below identify concern regarding the scoring criteria and analytical approach applied throughout the document.

1. The scoring approach used to rank the numerous sites and ultimately identify a ‘preferred’ location is highly ambiguous and inconsistent; a number of measures and scores have been overlooked and poorly advised focusing on a very restrictive bandwidth of analysis.

1.1. Scoring has not been followed consistently (e.g. site performance criteria) – The document has laid out a measure but then applied it inconsistently – thus not following any structure or procedure.

1.2. The Council has chosen to disregard the scoring system when making their recommendation and preference. Cabbage Field scores higher than Cowling Road and a number of other options. Which implies the potential that there is an ulterior motive in their judgment.

1.3. Marking appears subjective and inconsistent – e.g. Cowling deliverability indicators all score yes the site is commented to be deliverable; however, cabbage hall fields which scores exactly the same but is only commented as being potentially deliverable. Again this shows ambiguity and inconsistency.

1.4. Further examples and questions regarding how the scoring appears to mix varying shades of subjectiveness and inconsistency:

1.4.1. Within EN2 – It is not clear what weighting or specifics the ‘Outside’
characteristic holds and again is ambiguous if this impact the scoring.

1.4.2. Does it consider distance ‘outside’ given distance is a key consideration in other
criteria?

1.4.3. In S1 criteria – It is not clear what the difference is between a convenience
store vs. supermarket and how do they differ / rank. The Ackhurst site is located near
to a Tesco supermarket but appears to be marked down against convenience store.

1.4.4. The scoring criteria does not take into account other important decision making
factors for a ‘through-life’ consideration, (Maintainability, Sustainability, Financial
Benefit to Taxpayer, etc.)

2. Attached as an appendix to this document are a number of documented examples
of improved and comprehensive analysis against the application of the Council scoring
criteria and publically available evidence which clearly position other sites as more
favourable to Cowling Farm.

3. No evidence of best practice towards this type of proposal has been considered -
other Councils across the country have had to apply an approach to inform their
community on similar decisions.

4. No evidence of how covenants running with Cowling Farm land been considered
based on its land ownership history from the Mill and the Gillett Family.

5. This representation form states that “The Council is not inviting views on whether
this proposed allocation is sufficient to meet the permanent and transits needs of the
Gypsy, Traveller and Travelling Showpeople Community as this issue is being
considered in a separate Development Plan Document (DPD – taken forward
December 2014).”

5.1. Surely any decision that identifies a ‘preferred’ option must take this into account
and scoring criteria should be transparent towards how this will be considered during
this consultation process.

5.2. Notice the proposal document states a ‘minimum of 5 pitches’ again it is not
clear what this means. The scoring criteria must clearly articulate to ensure decision
makers understand the sub factors and thus gravity of their decisions. Criteria of this
kind will help ensure the planning team can demonstrate clear and transparent
decision making – this consultation period must consider these two aspects hand in
hand.

The points below identify concern regarding the Part 2 document (attached in
appendix to this representation submission) requested under the Freedom Of
Information request. All comments directly relate to specific elements of each
paragraph where possible and identify how points could be misleading towards
Councillors and decision makers.

1. Table 1 page 23 – The size of the Cowling Farm site is erroneously shown as 0.5ha
when it is in fact 9.5ha. This huge discrepancy could have led the Councillors to believe
they were voting for a small parcel of land that was appropriately sized for the
Permanent Gypsy and Traveller site not a significantly large parcel of land that would
be impacted by the building of the Permanent Gypsy and Traveller site.

2. Para 20 – This para states that one of the factors taken into account is ‘peaceful
and integrated co-existence’ we believe that using Cowling Farm as the prefer option
would be detrimental to this policy as the size of the site would makes it susceptible to
unauthorised and illegal encroachment and encampment by additional transient
Gypsies and Travellers. This would not be an issue for a number of other more viable
sites which are of appropriate size and could be managed by CBC and resident
permanent Gypsies and Travellers.

3. Para 23 – The costs shown do not reflect the cost of access roads to an adoptable
standard. A point that was confirmed by the CBC Head of Planning at a meeting with
residents on the 26th June 2014. Again this makes the recommendation unsound as it
is based on inaccurate data.

4. Para 24 – CBC considered only 9 sites but 2 of the sites Hut Lane and Crosse Hall
Lane were in insufficient size for the proposed site. In addition other possible sites do
not appear to have been considered, for example a plot of land off Southport Road
identified by Councillor Terence Brown to Cowling residents at a recent meeting. Therefore there appears to have been a lack of rigour to the identification and assessment of viable sites.

5. Para 25 – We do not consider that the preferred option is justifiable due to the lack of ‘proportionate evidence’.

6. Para 27 – The Cowling farm site does not meet this criteria (i.e. not in Green Belt) as the proposed access (ref para 45 and 47) is within the Green Belt.

7. Para 28 - This para is both misleading and inconsistent with other parts of the document as it states ‘it is considered that it is not necessary to allocate a site within the Green Belt’ later (in Para 47) it states that ‘this may require the access road to be removed from the Green Belt’.

8. At best para 28 is misleading but it could be argued that it is in fact untrue.

9. Para 36 – This para is again misleading as it states when comparing Cowling Farm and Cabbage Hall fields ‘…Cowling Farm access could be made via a dedicated access, and would not be via a residential estate road’ This infers that access to Cabbage Hall Fields would be accessed via a residential estate road whereas it is clear from the preferred option document issued by CBC (page 24 para 1) that Cabbage Hall Fields can be accessed via Chorley North Industrial Park.

10. Again this para is misleading and could have influenced the Councillors recommendation with incorrect information regarding the preferred option.

11. Also in para 3b there is a subjective statement regarding the topography of the sites. In our opinion Cowling Farm also has a challenging topography which I am sure the planning team would confirm.

12. Para 37 – the information contained herein is incomplete in respect of Ackhurst Road maybe not being available. Surely the planning team would have confirmed the facts otherwise why was the site even considered. Another example of the incompleteness of the assessment leading to a flawed recommendation.

13. Para 38 – this is a wholly subjective judgement build on the previously referred to incomplete, erroneous and misleading information. It is unreasonable to refer to ‘the most reasonable site’ without a full and proper evidence trail.

14. Para 42 – this para confirms that the planning team have not completed a full financial assessment of the preferred option. It is our opinion following professional advice that the cost of the Cowling Farm site has been massively under-costed due to the need to build a dedicated access and adoptable road from the site boundary to the proposed site. Again this is seen as erroneous information upon which a decision has been made.

15. Para 45 – The second bullet of this para is wrong as a dedicated access is not achievable from the southern boundary due to;

16. The access point being through Green Belt land that is the subject of a restrictive covenant

17. There being major road safety implications of such a proposed access

18. Para 47 – Again this section omits to mention the covenant that applies to the land next to Cowling farm. This could be misleading to the Councillors as they were not made aware of the covenants. Additionally the para states that there will be no adverse impact on the setting of Cowling Farm. This statement is untrue as building an access road and permanent Gypsy and Traveller site on the boundary of a listed building must have a detrimental impact towards it.

19. General Observation (Not in document) All residential properties on Cowling Road are stone fronted with recent developments on Flag Lane and Bridge Mill Court all being built in keeping with this semi-rural location; trailers by essence could not be said to be in keeping.

7: Necessary changes

Based on all the publically available information as previously asserted in the last section of this document; the Council’s lack of community engagement; its continuing failure to publicise; its lack of stakeholder notification, its failure to embrace the Localism Act 2011 and the knock-on effect on any future neighbourhood planning are all part of a growing body of evidence that the local settled community has been
discriminated against.

These are the most serious of issues and hence I would appreciate that the Council withdraw its Preferred Options Document. The Council should then carry out a thorough open and transparent review of all the points mentioned and all actions carried out in relation to the Preferred Options Document to demonstrate appropriate engagement and legality.

I welcome a revised schedule of deadlines and a corrected and improved engagement process/methodology that reflects best practice be published to enable robust decision making in an open, honest, fair, inclusive and transparent way.

8: Participate in examination? Yes
9: Reason participation necessary

There are significant number of observations identified that I feel would benefit from participation in this forum to ensure all key points are appropriately discussed and understood.

Councils response

Objection Noted. The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Localism Act also introduced a new right for communities to draw up a neighbourhood plan. Provided a neighbourhood development plan or order is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and with other legal requirements, local people will be able to vote on it in a referendum. If the plan is approved by a majority of those who vote, then the local authority will bring it into force.

The representation form and guidance notes provides information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning...
Policy Framework. In addition to this form the Council has accepted comments by letter and email. A direct link was placed on the homepage of the Council’s website when concerns were raised about the accessibility of the information. The Council also made an online consultation form available through Survey Monkey. The Council considers the process of arriving at an allocation to be legally compliant and sound.

The Council has an adopted Statement of Community Involvement (2006), however this is now out-of-date. The revised draft Statement of Community Involvement has been subject to a 4 week consultation between Monday 30 June and Monday 28 July 2014. The revised SCI has been produced in line with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which reflect the reforms set out in the Localism Act 2011, consolidate the changes made to the 2004 Regulations into a single document; and ensure the new regulations are as effective and simple as possible. These include:

- Local planning authorities are required to make information on their planning activity available to their communities as soon as it is ready, and to do so on-line;
- The new regulations prescribe additional bodies that are subject to the ‘duty to co-operate’ under section 110 of the Localism Act 2011.
- The preparation and adoption stages by local planning authorities of development plan documents and supplementary planning documents including as to consultation with interested persons and bodies and the documents which must be made available at each stage.

The SCI also covers the consultation process for when a Neighbourhood Plan application is submitted and the consultation process for the Community Infrastructure Levy Charging Schedule. It is intended the SCI will be approved by Council on 23 September 2014.

The local plan examination has been effectively suspended while the Council considers the allocation of a suitable site for a minimum of five pitches. As such, the formal stages for plan preparation are not restarted. The Council is following the direction and timetable set by the examining inspector.

The reasons for the report to Full Council on 3 June 2014 being a part 2 report were firstly it contained personal information relating to the children of potential occupants of the site. Secondly the fact that a particular site could potentially be allocated might have had an effect on the value of neighbouring land. In the event that certain sites considered in the report were not approved by members for consultation there would be no public interest in this information being published. However consultation for all sites mentioned in the report was approved on 3 June which meant that the report could then be published. The Council released the part 2 report on 3rd July 2014 shortly after the Full Council meeting.

The Preferred Options document refers to 9.5 hectares. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The Council has assessed 8 sites in its ownership and one of which is a preferred site for allocation therefore it does not need to consider the land off Southport Road.
The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The Council do not intend to access the land at Cowling Farm through the curtilage/garden of Cowling Farm which is listed and not in their ownership. The Council’s indicative layout provided to representors by Cllr Kim Snape was prepared by the Council to show the size of an 0.4 hectare site.

The information provided by Lancashire County Council Highways on traffic accidents is fact.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key
policies
- the land is allocated for housing and employment, therefore the principal of housing
development is established

The site at Cabbage Halls Fields has been discounted as a preferred site, but any
proposed access would be from the Chorley North Industrial Park and not Cowslip
Way.

Cowling Farm is the most expensive option, along with Harrison's Farm, but it is
considered the most suitable site and is available and achievable. The "cheapest" site
is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of
£380,000 but it is too small to accommodate 5 pitches. The estimated cost of the
remaining sites ranges from £480,000 to £600,000. Funding may be available from the
Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation Document.

The undulating topography of the site will be taken account of as part of the
masterplanning process for the site. It is considered that some contouring will be
required to facilitate the development of the Gypsy and Traveller pitches and the
allocation as a whole.

Any proposed development needs to minimise harm to the significance of the historic
environment. The Cowling Farm site is located to the east of the existing curtilage to
Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment
has been undertaken which considers:
- the contribution that the Cowling Farm site makes to the significance of Cowling
Farmhouse
- the impact that the loss of the Cowling Farm site and its subsequent development
might have upon the significance of the Farmhouse
- how any harm might be removed or reduced
- the impact that the loss of this site and its subsequent development might have
upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development
buffer zone and screen planting, will result in an acceptable relationship between
development on the proposed site and the designated heritage asset such that the
significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a
positive impact on the setting of Cowling Farmhouse. Applications for the
development of this site will be assessed against Policy 16 (Heritage Assets) in the
Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and
BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on
conserving and enhancing the historic environment in the National Planning Policy
Framework. An application will need to demonstrate an understanding of the
contribution of the site to the significance of Cowling Farmhouse, the impact of
developing the site upon it, and specifically how the proposed development will
impact upon its setting.
1: Evidence why available/suitable/achievable?

- Improper use of taxpayers money and loss of value to existing land asset, and this site is the highest income outlay of all proposed sites.
- It will cause significant traffic, road safety and health and safety issues.
- Unacceptable manipulation/annexing of Green Belt designated land for site access.
- Damage to the areas rural character.
- Unacceptable risk that Gypsies from across the northwest expand the site/adjacent land to dale farm area.
- Destruction of development and employment opportunities on Moorland Gate Business Park.
- More appropriate sites can be found elsewhere for much less cost. E.g. Hut Lane Travellers want Yarrow Bridge site and planning law suggests that brownfield sites (i.e. Yarrow Bridge, Cabbage Hall Fields and Ackhurst Road) should always be used first before greenfield.
- Failure, by the Council, to follow a transparent, fair and proper process e.g. breaching Localism Act 2011.
- Protection of English heritage, there are plans to have an entry road into the south side of Cowling Farm, as this is a Grade II listed building, the Council has an obligation to protect the setting and surrounding areas of listed building.
- According to the 1994 Act the local authority does not have a liability to provide new Traveller sites, only to maintain and re-furbish existing sites.
- The proposed Cowling Farm site will be affected by other noise and pollution issues from the M61 motorway.
- The proposed site will be restricting established rights of way for using "public footpaths".

Points to be clarified by Chorley Borough Council site proposal:
- CBC states that parts of the Cowling site are relatively flat, ignoring the fact that most of the site is sloping. Whilst the Yarrow Bridge site appears to be flat and largely hard surfaced (much more suitable for siting mobile homes).
- CBC states the Cowling site has a bus service frequency of less than one per hour, it in fact has a service on just two days per week.
- CBC states Cowling site is 1.6 to 3.2km from further/higher education, whilst the Yarrow Bridge site is stated to be over 5km from such facilities when in fact the site is almost within sight of two such schools.
- CBC states Yarrow Bridge site is claimed to be Grade 3 agricultural site, but it appears to be semi derelict with no agricultural use apparent in the surrounding area.
- As a post script - I wonder if the CBC members have every visited Chorley?

Please clarify the points below:
- Page 1 - Item 4, Point 4 - Protection of Green Belt "That plan making and decision taking should protect Green Belt from inappropriate development - my opposition is inappropriate uses of Green Belt.
- Page 2 - Item 6A - early and effective engagement with settled community. "Pay particular attention to early and effective community engagement with both settled and Traveller communities" - my objection is there was no early and effective community engagement.
-Page 3 - Item 9D - size and location of site "Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population size and density." - my objection proposed 150 pitches (taking a family of 5 as an average) represents 750 Travellers against the present residents population, too high in my opinion.

-Page 3 - Item 9E - Protect local amenity and environment - my objection the resulting noise pollution, and increased traffic density will affect the environment.

-Page 4 - Item 10 - Policies should be fair - "Criteria based policies should be fair and should facilitate the traditional and nomadic life of Travellers, while respecting the interests of the settled community" - my objection is my interests have not been respected. There has been no direct communication. Furthermore already a property sale has fallen through when the buyer was made aware of the proposed Traveller site.

-Page 4 - Item F - avoid placing undue pressure on local infrastructure and services - my objection is the road system is already becoming dangerous to users, particularly at weekends. The drainage of surface water and foul drains are easily over powered - this will require upgrade at future expense to taxpayer.

-Page 4 - Item 12 - policy 'C' - sites in rural areas and the countryside. "When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community" - my objection as stated previously, this will occur.

-Page 4 - Item 23 - Local planning authorities should strictly limit new Traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas, respect the scale of, and do not dominate the nearest settled community, and avoid placing an undue pressure on the local infrastructure - my objection is none of these requirements will be met.

-Page 4 - Item 24 - weighting of proposed sites. "When considering applications, local planning authorities, should attach weight to the following matters - a) effective use of previously developed (brownfield) untidy or derelict land - my objection is no weighting was applied to the Yarrow Bridge site.

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared?  
5(2): Not justified?  
5(3): Not effective?  
5(4): Not consistent with national policy?  
6: Reasons not legally compliant/unsound  
7: Necessary changes  
8: Participate in examination?  
9: Reason participation necessary  

Councils response

Cowling Farm is the most expensive option, along with Harrison's Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation Document.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see
Proposed Site Allocation document -LCC Highway comments pages 31-32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The Council considers that actual or perceived impact on property value and businesses is not a material planning consideration.

The land is allocated for housing and employment; therefore the principle of development is established. There are a number of planning policies that seek to protect landscape amenity and these will be complied with in any detailed planning application.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- the land is owned by the Council and is deliverable and developable
- a dedicated access is achievable
- the land is within the settlement of Chorley and accessible to services and facilities
• It has the potential to meet the needs of the existing Traveller community at Hut Lane
• The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• It is sustainable, scoring B and would be compliant with the Core Strategy key policies
• The land is allocated for housing and employment, therefore the principle of housing development is established.

The Council has considered brownfield sites as part of this process, but as stated Cowling Farm is considered the most reasonable site when considered against the alternatives. National planning policy in the Framework encourages the re-use of brownfield land, but does not state that it should always be used before greenfield land.

The Council has progressed this proposed allocation in full accordance with its Statement of Community Involvement. The volume of representations received demonstrates how 'engaged' the local community has been in this work.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:
• The contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
• The impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
• How any harm might be removed or reduced
• The impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.

Government policy in 'Planning policy for Traveller sites' (2012), reflects current planning legislation and it requires Local Planning Authorities to set pitch targets for Gypsies and Travellers which address the likely accommodation needs of Travellers in their area. The Local Plan Inspector states that the Local Plan 2012 - 2026 may not be adopted unless it is found sound regarding its provision for Gypsies and Travellers.

The proximity of the M61 to the site will be taken account of as part of the masterplanning process.

Public rights of way will be taken account of as part of the masterplanning process and incorporated into development proposals.

Parts of the site are relatively flat, but other areas are undulating. The topography of the site will be taken account of as part of the masterplanning process.
Comments in respect of inconsistencies are noted. It is recognised that public transport is limited in this area. However, this has to be considered in the context of a total of 42 sustainability indicators. In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments.

The Yarrow Bridge site is on Grade 3 agricultural land, but is not used for agricultural purposes.

In relation to the other points that relate to 'Planning Policy for Traveller sites':

Page 1 - Item 4, Point 4 - Protection of Green Belt: Cowling Farm is not in the Green Belt. See Lancashire County Council Highway comments above (see Proposed Site Allocation document -LCC Highway comments pages 31-32). In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.'

Page 2 - Item 6A - early and effective engagement with settled community: The Council has progressed this proposed allocation in full accordance with its Statement of Community Involvement. The volume of representations received demonstrates how 'engaged' the local community has been in this work.

Page 3 - Item 9D - size and location of site: The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The site area required is estimated to be 0.4 ha, which is not considered inproportionate to the surrounding population's size and density. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.

Page 3 - Item 9E - Protect local amenity and environment: The land is allocated for housing and employment; therefore the principle of development is established. There are a number of planning policies that seek to protect landscape amenity and the Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criterion g) seeks to ensure that any new development will not cause 'an unacceptable degree of noise disturbance to surrounding land uses'.

Page 4 - item 10 - Policies should be fair: The Council has an adopted criteria based policy on Gypsy and Traveller and Travelling Showpeople accommodation in the Central Lancashire Core Strategy (Policy 8), which was found sound by the Planning Inspector. Perceived detrimental impact on property values/house sales are not a planning policy consideration.

Page 4 - Item F - avoid placing undue pressure on local infrastructure and services: See Lancashire County Council Highway comments above (see Proposed Site Allocation
document -LCC Highway comments pages 31-32). United Utilities have not objected to the principle of development on the site in terms of water and wastewater issues. They have stated 'We would seek the disposal of surface water to be directed to the local river and foul effluent to be discharged into the Croston Trunk sewer, unless otherwise agreed in writing. Access to a clean water supply is also possible but will require further detailed discussions with United Utilities to agree.'

Page 4 - Item 12 - policy 'C' - sites in rural areas and the countryside: The site area required is estimated to be 0.4 ha, which is not considered disproportionate to the surrounding population's size and density. (See also response to Page 3 item 9D above)

Page 6 - Item 23 - Local planning authorities should strictly limit new Traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan: This site is not in open countryside. It is on the edge of Chorley Town on an existing site that is allocated for development. The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The site area required is estimated to be 0.4 ha, which is not considered disproportionate to the surrounding population's size and density.

Page 6 - Item 24 - weighting of proposed sites: The Council has considered brownfield sites as part of this process, but Cowling Farm is considered the most reasonable site when considered against the alternatives. (See analysis included in section 8 of the Proposed Allocation document.)
Points to be clarified by Chorley Borough Council site proposal:
-CBC states that parts of the Cowling site are relatively flat, ignoring the fact that most of the site is sloping. Whilst the Yarrow Bridge site appears to be flat and largely hard surfaced (much more suitable for siting mobile homes).
-CBC states the Cowling site has a bus service frequency of less than one per hour, it in fact has a service on just two days per week.
-CBC states Cowling site is 1.6 to 3.2km from further/higher education, whilst the Yarrow Bridge site is stated to be over 5km from such facilities when in fact the site is almost within sight of two such schools.
-CBC states Yarrow Bridge site is claimed to be Grade 3 agricultural site, but it appears to be semi derelict with no agricultural use apparent in the surrounding area.
-As a post script - I wonder if the CBC members have every visited Chorley?

Please clarify the points below:
-Page 1 - Item 4, Point 4 - Protection of Green Belt "That plan making and decision taking should protect Green Belt from inappropriate development - my opposition is inappropriate uses of Green Belt.
-Page 2 - Item 6A - early and effective engagement with settled community. "Pay particular attention to early and effective community engagement with both settled and Traveller communities" - my objection is there was no early and effective community engagement.
- Page 3 - Item 9D - size and location of site "Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population size and density." - my objection proposed 150 pitches (taking a family of 5 as an average) represents 750 Travellers against the present residents population, too high in my opinion.
- Page 3 - Item 9E - Protect local amenity and environment - my objection the resulting noise pollution, and increased traffic density will affect the environment.
- Page 4 - item 10 - Policies should be fair - "Criteria based policies should be fair and should facilitate the traditional and nomadic life of Travellers, while respecting the interests of the settled community" - my objection is my interests have not been respected. There has been no direct communication. Furthermore already a property sale has fallen through when the buyer was made aware of the proposed Traveller site.
- Page 4 - Item F - avoid placing undue pressure on local infrastructure and services - my objection is the road system is already becoming dangerous to users, particularly at weekends. The drainage of surface water and foul drains are easily over powered - this will require upgrade at future expense to taxpayer.
- Page 4 - Item 12 - policy 'C' - sites in rural areas and the countryside. "When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community" - my objection as stated previously, this will occur.
- Page 6 - Item 23 - Local planning authorities should strictly limit new Traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas, respect the scale of, and do not dominate the nearest settled community, and avoid placing an undue pressure on the local infrastructure - my objection is none of these requirements will be met.
- Page 6 - Item 24 - weighting of proposed sites. "When considering applications, local planning authorities, should attach weight to the following matters - a) effective use of previously developed (brownfield) untidy or derelict land - my objection is no weighting was applied to the Yarrow Bridge site.

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared? □

5(2): Not justified? □

5(3): Not effective? □

5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response

Cowling Farm is the most expensive option, along with Harrison’s Farm, but it is considered the most suitable site and is available and achievable. The “cheapest” site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation Document.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see...
Proposed Site Allocation document - LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The Council considers that actual or perceived impact on property value and businesses is not a material planning consideration.

The land is allocated for housing and employment; therefore the principle of development is established. There are a number of planning policies that seek to protect landscape amenity and these will be complied with in any detailed planning application.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

• The land is owned by the Council and is deliverable and developable
• A dedicated access is achievable
• The land is within the settlement of Chorley and accessible to services and facilities
• It has the potential to meet the needs of the existing Traveller community at Hut Lane
• The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• It is sustainable, scoring B and would be compliant with the Core Strategy key policies
• The land is allocated for housing and employment, therefore the principle of housing development is established

The Council has considered brownfield sites as part of this process, but as stated Cowling Farm is considered the most reasonable site when considered against the alternatives. National planning policy in the Framework encourages the re-use of brownfield land, but does not state that it should always be used before greenfield land.

The Council has progressed this proposed allocation in full accordance with its Statement of Community Involvement. The volume of representations received demonstrates how 'engaged' the local community has been in this work.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:
• The contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
• The impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
• How any harm might be removed or reduced
• The impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.

Government policy in 'Planning policy for Traveller sites' (2012), reflects current planning legislation and it requires Local Planning Authorities to set pitch targets for Gypsies and Travellers which address the likely accommodation needs of Travellers in their area. The Local Plan Inspector states that the Local Plan 2012 - 2026 may not be adopted unless it is found sound regarding its provision for Gypsies and Travellers.

The proximity of the M61 to the site will be taken account of as part of the masterplanning process.
Public rights of way will be taken account of as part of the masterplanning process and incorporated into development proposals.
Parts of the site are relatively flat, but other areas are undulating. The topography of the site will be taken account of as part of the masterplanning process.
Comments in respect of inconsistencies are noted. It is recognised that public transport is limited in this area. However, this has to be considered in the context of a total of 42 sustainability indicators. In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments.

The Yarrow Bridge site is on Grade 3 agricultural land, but is not used for agricultural purposes.

In relation to the other points that relate to 'Planning Policy for Traveller sites':

Page 1 - Item 4, Point 4 - Protection of Green Belt: Cowling Farm is not in the Green Belt. See Lancashire County Council Highway comments above (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.'

Page 2 - Item 6A - early and effective engagement with settled community: The Council has progressed this proposed allocation in full accordance with its Statement of Community Involvement. The volume of representations received demonstrates how 'engaged' the local community has been in this work.

Page 3 - Item 9D - size and location of site: The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The site area required is estimated to be 0.4 ha, which is not considered inproportionate to the surrounding population’s size and density. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

• Community engagement between the settled and Traveller community.
• The masterplanning process.
• Highways options in relation to the delivery of the mixed use site.

Page 3 - Item 9E - Protect local amenity and environment: The land is allocated for housing and employment; therefore the principle of development is established. There are a number of planning policies that seek to protect landscape amenity and the Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criterion g) seeks to ensure that any new development will not cause ‘an unacceptable degree of noise disturbance to surrounding land uses’.

Page 4 - item 10 - Policies should be fair: The Council has an adopted criteria based policy on Gypsy and Traveller and Travelling Showpeople accommodation in the Central Lancashire Core Strategy (Policy 8), which was found sound by the Planning Inspector. Perceived detrimental impact on property values/house sales are not a planning policy consideration.

Page 4 - Item F - avoid placing undue pressure on local infrastructure and services: See Lancashire County Council Highway comments above (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). United Utilities have not objected
to the principle of development on the site in terms of water and wastewater issues. They have stated 'We would seek the disposal of surface water to be directed to the local river and foul effluent to be discharged into the Croston Trunk sewer, unless otherwise agreed in writing. Access to a clean water supply is also possible but will require further detailed discussions with United Utilities to agree.'

Page 4 - Item 12 - policy 'C' - sites in rural areas and the countryside: The site area required is estimated to be 0.4 ha, which is not considered disproportionate to the surrounding population's size and density. (See also response to Page 3 item 9D above)

Page 6 - Item 23 - Local planning authorities should strictly limit new Traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan: This site is not in open countryside. It is on the edge of Chorley Town on an existing site that is allocated for development. The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The site area required is estimated to be 0.4 ha, which is not considered disproportionate to the surrounding population's size and density.

Page 6 - Item 24 - weighting of proposed sites: The Council has considered brownfield sites as part of this process, but Cowling Farm is considered the most reasonable site when considered against the alternatives. (See analysis included in section 8 of the Proposed Allocation document.)
We would like to make the following comments:

It would seem that the Council have already decided where this site should be and could lead the public to believe that the exercise does not meet the provisions of community involvement.

The Council’s preferred site, Cowling Farm, identifies access issues. It goes on to provide a solution to create a permanent or temporary access across the Green Belt land adjacent to the settlement boundary of Chorley, which is also in the ownership of the Council. This will require the access road to be removed from the Green Belt designation and designated as part of the Gypsy and Traveller site and within the Chorley settlement. Given that other sites have been ruled unsuitable because of the impact on Green Belt surely this is contrary to policy. This is also a very large site offering an opportunity for unplanned, unofficial expansion of the site. This area also borders Limbrick playing fields and would have an adverse impact on this valuable resource to the towns folk and children.

Crosse Hall Lane proposal - this site was incorrectly identified. It is not on Crosse Hall Lane but Haworth Road. Whilst we understand that this site has now been deemed unsuitable because of size we are extremely concerned that land identified as a community play area should now be considered for other purposes. It sets a dangerous precedent.

Lastly we would like to advocate that the Yarrow Bridge site in our opinion provides the most suitable option for the Gypsy and Traveller site. Firstly, this is one of the Gypsy and Traveller peoples preferred options. Therefore should not provide an opportunity for them not to move from Hut Lane. Secondly it is a contained site. Although this site is designated as Green Belt it has been previously developed and there is a presumption in favour of the sustainable development of previously developed areas making it suitable under the town plan. Lastly the access difficulties raised would not seem to be too major given that this site has been used by large Council vehicles for years.
**8: Participate in examination?**

**9: Reason participation necessary**

**Councils response**

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of sites received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The Cowling Farm site is allocated for housing and employment therefore the principle of development is established. It will not impact on the leisure facilities at Limbrick to the south of the allocation.

Haworth Road (previously named Crosse Hall Lane), Chorley. The Council will make the appropriate amendment to add Haworth Road before submitting the document to the Local Plan Inspector (September 2014). The Council has discounted this site as a
Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8. The site identified is not allocated as a community play area in the Chorley Local Plan. The adjacent site has not been assessed as a community play area because the equipment has been removed and the site is not used.

Yarrow Bridge: Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
Title: Mrs  First Name: Anne  Last Name: Whittaker  Organisation: 

Site/location  1. Cowling Farm

Paragraph/section

Modification

1: Evidence why available/ suitable/ achievable? No

2: Agree with preferred site? No

3: Comments on document

The access to this site will mean the road will have to go through Green Belt land and the site would be very close to a new housing development.

The Hut Lane site where the Romany Gypsies are at present living has already got good access and is not as close to houses as one side of the boundary is motorway and is a good flat site, and wouldn't cause as much disruption as the Cowling Farm site.

4(1): Legally compliant? No

4(2): Sound?

5(1): Not positively prepared? 

5(2): Not justified? 

5(3): Not effective? 

5(4): Not consistent with national policy? 

6: Reasons not legally compliant/unsound

Would be using Green Belt land for the road access.

7: Necessary changes

The road access land would have to be taken out of Green Belt. But that could also be done at the Hut Lane site, that would alleviate any discrimination towards Gypsies and Travellers and stop any further issues of community engagement. A permanent site is needed and Councils have refused permission on other Green Belt sites.

8: Participate in examination?

9: Reason participation necessary

Councils response

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not
affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key policies
- The land is allocated for housing and employment, therefore the principle of housing development is established

Hut Lane scores Band D under the sustainability appraisal, making it the least sustainable of all the sites assessed.
I have been retained by a number of local residents to critique the processes and analysis carried out to date by Chorley Borough Council with regard to the Gypsy and Travellers and Travelling Showpeople Preferred Options Paper.

In reality the Council finds itself with no ideal site. However, the process by which it has found itself opting for Cowling Farm is both unsound and highly questionable on sustainability grounds. It would appear to me that on sustainable grounds, the best locations are either a combination of Crosse Hall Lane and Northgate Drive or Northgate by itself or Cabbage Hall Fields by itself.

Cowling Farm appears more to be the site of convenience, a site where there is an existing expectation of new development, with no identified partner developer. There are few existing residents in the immediate locality and by picking this site it allows for masterplanning to be done in advance of the new development. This fails to demonstrate social integration but it is the easiest option in terms of community concerns.

The preferred option report appears to bypass what in law could be reasonably considered to be an important stage in the whole process, namely the open and transparent assessment of each and every alternative site and their full assessment against a series of criteria and the weighting to be given to those criteria.

Cases of relevance:
- Save Historic Newmarket Ltd v Forest Heath District Council (2011)
- Heard v Broadland District Council, South Norfolk District Council, Norwich City Council

It is vital that the analysis of the various sites be based on accurate up to date information. If not then that in itself would seriously undermine the legitimacy of arriving at a preferred option. If that information is found not to be accurate and up to date then the process may have to be restarted.

Six of the sites have a B banding. In theory and to the man on the local bus they are all therefore equal. Without a weighting system it is therefore unclear how the analysis that has been carried out has come to this point.
The report to Council on 3rd June appears to contain a number of interesting comments e.g. 'Cabbage Hall Fields has challenging topography...' Why? Because it's not flat? The reader is left to guess what the writer is saying. Additionally the development of Northgate Drive '...may cause a detrimental impact on neighbouring open space...' Again why? Is it suggested that having a Gypsy and Travellers site adjacent to open space may result in damage to the open land, or overspill onto it? On the other hand it is acknowledged that Cowling Farm is adjacent to a Grade II listed building and a new access road will be required to be built adjacent to the said listed building. However there is no mention of the impact of the road or the proposed development on the listed building having regard to paragraph 129 of the NPPF.

The case for the preferred site seems to be predicated partially on the comments from the Inspector in her partial report into the Local Plan suggested that in principle part of an existing allocation could be used for Gypsy and Travellers accommodation. The Council appear to have placed undue weight onto this comment rather than on the sustainability credentials of the site in question.

Another factor which has weighted heavily in favour of the LPA preferring Cowling Farm is the proximity to the schools the existing Gypsy families are at. The evidence suggests that any site on the south side of the town centre would be preferable, but not a must.

Finance is a material issue having regard to the Localism Act. The highest cost in terms of provision is at the preferred choice site which the report to full Council on 3rd June attempts to play down as not being an overriding factor, but is still a factor.

FURTHER REPRESENTATION ON FILE

7: Necessary changes
A further and full report should have been provided explaining why alternative sites were not suitable. There is no evidence in the public arena as to why the preferred site was considered the most suitable. It fails a number of legal tests.

8: Participate in examination? Yes

9: Reason participation necessary
Councils response
Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:
• the land is owned by the Council and is deliverable and developable
• a dedicated access is achievable
• the land is within the settlement of Chorley and accessible to services and facilities
• it has the potential to meet the needs of the existing Traveller community at Hut Lane
• the site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• it is sustainable, scoring B and would be compliant with the Core Strategy key policies
• The land is allocated for housing and employment, therefore the principal of housing development is established.

National Planning Practice Guidance states “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.” The SA scoring is not weighted as it is not considered that some indicators have more importance. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding Allocation. A number of other factors such as deliverability need to be taken into consideration.

The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report.

Further analysis of the merits of each site has been undertaken. This has considered the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.

Haworth Road (previously named Crosse Hall Lane), Chorley. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8. The adjacent site has not been assessed as a community play area in the Chorley Local Plan. (See Proposed Site Allocation Document - Section 8, Site Information and Sustainability Appraisal)

The Council has discounted the Cabbage Fields site as a Gypsy and Traveller site because of the topographical changes in the levels on site which are likely to restrict the number of pitches. The undulating topography of the Cowling Farm site will be taken account of as part of the masterplanning process for the site. It is considered that some contouring will be required to facilitate the development of the Gypsy and Traveller pitches and the allocation as a whole. (See Proposed Allocation Document Section 8, Site Information and Sustainability Appraisal).

The Council has discounted the site at Northgate Drive as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d). At Northgate Drive the adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value. (See Proposed Allocation Document Section 8, Site Information and Sustainability Appraisal).

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:

• The contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
• The impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
how any harm might be removed or reduced
• the impact that the loss of this site and its subsequent development might have
  upon the significance of Cowling Farmhouse with mitigation measures in place
The heritage impact assessment concludes that mitigation, by way of a development
buffer zone and screen planting, will result in an acceptable relationship between
development on the proposed site and the designated heritage asset such that the
significance embodied therein will be sustained.
Any development of this site needs to be sensitively designed so that it will have a
positive impact on the setting of Cowling Farmhouse. Applications for the
development of this site will be assessed against Policy 16 (Heritage Assets) in the
Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and
BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on
conserving and enhancing the historic environment in the National Planning Policy
Framework. An application will need to demonstrate an understanding of the
contribution of the site to the significance of Cowling Farmhouse, the impact of
developing the site upon it, and specifically how the proposed development will
impact upon its setting.
The access to the proposed Gypsy and Traveller site has yet to be finalised.
Lancashire County Council (LCC) Highways have provided an updated response (see
Proposed Site Allocation document -LCC Highway comments pages 31 -32). They
identify that there are three potential accesses to the site with access off Moorland
Gate being the preferred access route from a highways perspective. Moorland Gate is
an adopted public highway to the turning head end of the road and there is scope for
the sort of improvements that they would wish to see to enable access between the
site and local facilities on foot and by bus (for example a formal footway along the
eastern side of the road). Current access made off the road by the businesses served
off Moorland Gate would not be impeded by the projected use of the site, although
there would be an inevitable loss of on-street parking at the junction should a new
access be taken off Moorland Gate. Details of how the access will be designed, laid out
and constructed will be submitted as part of any future planning application for an
allocated site which is when more thorough highways assessments will be undertaken
by Lancashire County Council.
Under Para 90 of the Framework, certain forms of development are 'not
inappropriate in the Green Belt provided they preserve the openness of the Green Belt
and do not conflict with the purpose of including land in the Green Belt'. These include
'local transport infrastructure which can demonstrate a requirement for a Green Belt
location.' In a case where access is required through the Green Belt, this would not
affect the openness of the Green Belt and the site would be wholly situated within an
area allocated for a mix of housing and employment use. However, in light of more
detailed comments from LCC Highways it is not necessary to pursue this access and it
will not be necessary to seek the agreement to release the covenants for the specific
area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an
access can be achieved in principle only. Details of how this access will be designed,
laid out and constructed will be submitted as part of any future planning application
for an allocated site which is when more thorough highways assessments will be
undertaken by Lancashire County Council.
As stated the land is allocated for a mix of housing and employment in the Chorley
Local Plan 2012-2026. Land for the Gypsy and Traveller site will be discounted from
the allocated areas. This is acceptable because the Inspector (Dr Bussey -18 January
2014) stated "In principle I consider that the re-allocation of some existing housing
and/or employment sites for Gypsy and Traveller purposes would be acceptable.
Although this may have implications in relation to the need for updated evidence,
consultation and SA".
The Preferred Options document is explicit and refers that the site area required for
Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5
hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.

The respondents to the Gypsy and Travellers Survey were asked if they felt being near to a range of facilities was important or not important to them. These survey results have been taken account of when assessing sites. In Chorley proximity to primary schools, secondary schools, doctors, post offices/cashpoint, public transport and main roads were considered most important.

In accordance with national guidance the needs of the existing Traveller community have been taken into consideration. They state they would want to avoid their children having to change schools. They would be content with most locations in and around Chorley Town, Adlington or Coppull.

The Council has also examined sites put forward by the Gypsy and Traveller community as identified at Appendix 2 of the Preferred Options Document. All are in private ownership therefore the Council has no control over the land and cannot ensure deliverability; a number have been granted planning permission; a number are in the Green Belt and are deemed inappropriate development in the Framework and Planning Policy for Traveller Sites; and a number lie within a high risk flood zone. The Council endeavoured to find the location of all sites identified but were not able to identify the exact location of one site as not enough information or exact site details were provided by the gypsy and traveller community despite providing plans of the borough and having a meeting. The Council has assessed land in its ownership, over which it has control and therefore can ensure deliverability. The Council has also asked other stakeholders with major landholdings whether they have any suitable land available and they have confirmed that they do not have any suitable sites. In addition the Council has looked at sites suggested through its "call for sites" for the Local Plan in 2005 and 2007. Yarrow Bridge and Westhoughton Road have been included as they are previously developed sites in the Green Belt. The Hut Lane site has been included because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites.

Cowling Farm is the most expensive option, along with Harrison's Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation Document.
I do not agree to the use of the Cowling Farm area of land by Chorley Council for accommodating Gypsy Travellers. I believe that the Preferred Options document is neither legally compliant nor is it sound in its justification. Some of the key reasons for this include:

Failure by the Council to follow a transparent, fair and proper process. The local settled community does not see evidence of good practice in community engagement in order to inform the identification and selection of locations. The proposal is inconsistent and inaccurate in its appraisal of the various sites and does not include any reasoned argument that supports the selection of Cowling Farm as the preferred site.

There is a body of evidence that suggests that the Council may well have acted illegally. We do not see any evidence that the Council has taken the Localism Act 2011 into account in its decision to identify a preferred site. Further the Council is in breach of the Neighbourhood Planning (General) Regulations 2012 which states that ".....before submitting a plan proposal to the local planning authority, a qualifying body must .....publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area". The representation process appears to have been designed to discourage any participation unless one is an IT expert.

Failure by the Council to produce a sound proposal. The errors and inconsistencies in the Preferred Options document are manifest and too numerous to list in total but examples are:
They state that parts of the Cowling site are relatively flat, ignoring the fact that most of the site is sloping. The Yarrow Bridge site appears to be flat and largely hard surfaced, ideal for mobile homes.
They state that the Cowling site is within close proximity to a small number of housing and industrial units. It is in fact in close proximity to a significant number of houses, a business park, two picturesque pubs, a scout campsite and vulnerable football and cricket pitches and the 9.5Ha Cowling Farm site is earmarked for housing and employment allocation.
They state that the Cowling site has a bus service frequency of less than one per hour, it in fact has an insignificant service on just two days per week.
In their appraisal the Council have stated that the Cowling site includes land suitable for grazing - Is this a requirement or just a give-away opening up the whole site to official or unofficial use?
I cannot understand how the Cowling site is 1.6 to 3.2km from further/higher education whilst the Yarrow Bridge site is stated to be over 5km from such facilities but is in fact almost within sight of two such schools. Similar errors are apparent in other assessments relating to local facilities. The crucial objection to the Yarrow Bridge site appears to be that it is Green Belt but the Cowling proposal includes a requirement that the access road be removed from the Green Belt and designated as part of the Gypsy and Traveller site. The area of land so required is not quantified.
Improper use of tax-payers’ money and loss in value of existing land asset. The proposal does not show any reasoning behind choosing the most expensive option and has failed to take any account of likely contingent and associated costs and loss of income e.g. reduction or complete wipe out of the land value, possible loss of employment and housing opportunities and likely enforcement costs should control of the site be lost as has happened elsewhere.

Unacceptable manipulation/annexing of Green Belt designated land for site access. Whilst Green Belt status seems to be a negative factor in relation to other sites its use for an access road is dismissed in the Cowling Farm appraisal.

Unacceptable risk that Gypsies from across the North West expand the site / adjacent land to Dale Farm proportions. The Cowling Farm site is the largest by far and could be wide open to invasion regardless of fencing that might be installed. A much safer option would be a well contained site that could not be significantly invaded and illegally enlarged.

 Destruction of development and employment opportunities on Moorland Gate Business Park. Had any proper consultation been carried out the Council would have been aware that the business activity at Moorland Gate Business Park would likely be diminished and any possibility of expansion severely compromised should the Cowling Farm site be chosen.

The Council’s lack of community and local business engagement, the continuing failure to publicise, the lack of stakeholder notification, the flawed opportunities to comment, the failure to embrace the Localism Act 2011 and the flawed report are all part of a growing body of evidence that the local settled community has been discriminated against. These are the most serious of issues and I believe the Council should withdraw its Preferred Options Document. The Council should then carry out a thorough external review of all the points I have mentioned and actions carried out in relation to the Preferred Options Document to ensure their legality. A revised schedule of deadlines should then be published to enable due process to be completed which reflects best practice.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller
sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key policies
- The land is allocated for housing and employment, therefore the principal of housing development is established

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Comments have been submitted and considered regardless of whether or not they use the representations form.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Localism Act also introduced a new right for communities to draw up a neighbourhood plan. Provided a neighbourhood development plan or order is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and with other legal requirements, local people will be able to vote on it in a referendum. If the plan is approved by a majority of those who vote, then the local authority will bring it into force.

The undulating topography of the site will be taken account of as part of the masterplanning process for the site. It is considered that some contouring will be
required to facilitate the development of the Gypsy and Traveller pitches and the allocation as a whole.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

Comments in respect of inconsistencies are noted. The Cowling Farm site scores a Sustainability Assessment Band B and is therefore considered sustainable in terms of proximity to a range of services and facilities. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments. The Council has corrected the inaccurate distance for further/higher education in the Sustainability Appraisal for Yarrow Bridge, this does not affect the overall band of the site. See analysis in section 8 of the Proposed Allocation document.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

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The Council considers that actual or perceived impact on property value and businesses is not a material planning consideration. The Cowling Farm site is allocated for housing and employment therefore the principal of development is established. It will not impact on the leisure facilities at Limbrick to the south of the allocation. There is no proposal to allow an 'influx of transient others'. The proposal is for a permanent site of a minimum of 5 pitches to meet an identified need for Traveller accommodation.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

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The Preferred Options Consultation cannot be put on hold as the Council endorsed the approach and documents at Full Council on 3 June 2014 for 6 weeks consultation. The Council need to follow the Local Plan Inspector’s timetable and progress the Chorley Local Plan to adoption.
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4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared? ☐

5(2): Not justified? ☐

5(3): Not effective? ☐

5(4): Not consistent with national policy? ☐

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller
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In respect to the Localism Act 2011, we believe there has been a failure by Chorley Council to follow a transparent, fair and proper process. We only found out about the Council’s intentions through word of mouth and this has, in fact, been the case with a significant number of other residents. Some residents weren’t even aware of what was being deliberated on their behalf until a week ago. We believe this is both unfair and unacceptable. Further, there has been a lack of consultation with the settled community by Chorley Council and I believe that this has not allowed our community to properly discuss matters and prepare all necessary and relevant representations. Therefore, we firmly believe that proceedings should be suspended, thereby allowing a fair and proper process to take place, especially bearing in mind that a deadline of the 16th July has been set for all representations to be with Chorley Council.

Having studied the Preferred Option document and the data included in the Sustainability Appraisal Matrix (SAM), it is clear that a significant number of anomalies exist. For example, the sites at Yarrow Bridge and Cabbage Hall Fields score more highly on 9 and 11 criteria respectively than the Cowling Farm site. Without going into too much detail regarding these inconsistencies, one that really stands out for us relates to the assertion by Chorley Council that Yarrow Bridge scores lower than Cowling Farm regarding ‘Distance to Further/Higher Education’. This is clearly incorrect, as there are two educational establishments very close by and not "over 5km" away, as documented. Close proximity to schools is, understandably, very important to the Gypsy and Traveller community and we just cannot understand why Chorley Council would mislead our community and, just as importantly, the Gypsy community in this way.

Also, the reference to the regularity of the bus service for the Cowling Farm site. It states "significantly less than 1 per hour". There are, in fact only 4 a week, so the aforementioned statement is somewhat misleading as obviously, the bus service is categorically poor.

Another question we ask ourselves is why then has Cowling Farm been recommended by Chorley Council as the preferred option? Further, several of these anomalies made by Chorley Council, in respect of the SAM, were apparently confirmed as errors by the planning team at a meeting on the 26th June 2014, yet they deemed it unnecessary to amend the SAM accordingly. The recommendation made, therefore, in terms of Cowling Farm being the preferred option is made on non factual information and again, we request that the consultation process be suspended and that the Planning Team consult with Council Members in order to agree how the selection of a Preferred Option for a Permanent Gypsy and Traveller site for Chorley can be undertaken in a sound, open and inclusive way.

Implications also exist, in terms of a risk to the health and safety of both pedestrians and road users when one considers the proposal to create a new access road to the south of Cowling Farm. The volume of traffic is already high on this road and regularly exceeds the speed limit and this, of course, can only add to concerns. Further, Lancashire County Council (Lancashire County Council) have stated that in order to
ensure that there are no inherent safety risks to residents, a comprehensive review of the accident record of Cowling Brow should be undertaken to cover it’s entire length and possible additional safety measures implemented to mitigate the accident impacts. Lancashire County Council go on to say that this review is essential and if not carried out and any subsequent and relevant additional safety measures completed, then Highways will object. Why go to these lengths, both in terms of the costs involved and the risk to the safety of others, when other proposed sites already have access roads in place? Another implication relating to this point is the fact that the access road will cut right across Green Belt and it has not been made clear just how much land will be utilised. Our understanding is that boundaries to Green Belt should only be altered in exceptional circumstances and this clearly does not constitute exceptional circumstances when one considers that other, more viable options exist. The Cowling Farm site and surrounding areas represent the gateway to Rivington and the West Pennine Moors and the visual aspect of this beautiful countryside is one of Chorley’s greatest assets and should be cherished and protected.

As Cowling Farm is a Grade 2 listed building, surely it’s positioning and outlook should be maintained as part of Chorley’s heritage, along with the playing fields and cricket pitch, which were gifted to our community?

Another concern of ours is centred on the fact that no maximum level has been set for the number of pitches required. Given that the Cowling Farm site is 9.5 ha leads us to believe that the initial quota of 5 permanent pitches could very quickly and easily increase considerably and thus make it difficult to police. This increase wouldn't necessarily be carried out on a legal basis either and a situation that requires police intervention could easily arise. Consider the implications of this, including the financial aspect, which will impact on Chorley Council and, in particular, the Chorley taxpayer. We believe that one of the other sites that is smaller (e.g. Yarrow Bridge Depot at 0.63ha and Cabbage Hall Fields at 0.6ha), allows for greater efficiency, in terms of management and, in fact, would promote self policing.

On a similar note to the above, the use of Cowling Farm will have a detrimental effect on future developments, both in residential and business terms. If the Council wanted to maximise the monetary potential in capitalising on the use of the remaining acreage, full benefits may not be achieved and tax payers’ money therefore wouldn't be used ethically. Surely Chorley Council is here to serve the best interests of the local community?

In closing, my wife and I wish to emphasise that we totally respect the rights of the Gypsy and Traveller community and understand their entitlement to a suitable site. However, the aforementioned points raise some absolutely key questions and we feel that Chorley Council has a responsibility to provide answers to these questions. We believe that Chorley Council have failed to follow a fair, transparent and proper process and feel that the right and proper thing to do is to suspend proceedings and allow an independent review to take place, prior to any recommendations being made to Council members.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key policies
- The land is allocated for housing and employment, therefore the principal of housing development is established

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application
discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

Comments in respect of inconsistencies are noted. The Cowling Farm site scores a Sustainability Assessment Band B and is therefore considered sustainable in terms of proximity to a range of services and facilities. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. In relation to the Yarrow Bridge site, the distance to further/higher education is not 5km but should be 1.61 to 2.4km (referring to the further/higher education establishments at Woodlands/Lancashire College, Southlands Road). The two schools in the vicinity of Yarrow Bridge are not further/higher education establishments. The Council has corrected the inaccurate distance for further/higher education in the Sustainability Appraisal for Yarrow Bridge, this does not affect the overall band of the site. See analysis in section 8 of the Proposed Allocation document.

In relation to schooling the existing Traveller community children already avail of school places in Chorley Borough.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are ‘not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt’. These include ‘local transport infrastructure which can demonstrate a requirement for a Green Belt location.’ In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:
• the contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
• the impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
• How any harm might be removed or reduced
• How the impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.
I believe there is a significant and growing body of evidence that identifies that Cowling Farm site is NOT available, suitable and achievable due to the factors summarised in section 6 of this representation. This view is based on careful consideration of the Chorley Local Plan 2012 – 26, Gypsy and Travellers and Travelling Showpeople Preferred Options, Statement of Consultation Supplement: Regulation 22, (1) (c) Report and other publically available Council documents. I believe that the publicly available documents and process that the Council has used for a vehicle for decision making are considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or ‘sound’ proposal and therefore the preferred option has to be considered unsound. Please see section 6 for specific issues.

There are some key assertions identified in attached and below that identify significant breaches in legal compliancy of the Chorley Council’s ‘Preferred Options Report’. Significant concerns in the consultation approach have been identified that put into question the Council’s entire assessment and approach across all sites and comprehensively challenge both the “Legal Compliance” and the “Soundness” of the report ~ against all sub categories identified by the Council (Positively Prepared, Justified, Effective and consistent with National Policy).

I would also like to make it perfectly clear that all points raised in this representation are intended to be non-discriminatory. The issues identified do not challenge the spirit of creating a Gypsy and Traveller site; they do however aim to challenge how Chorley Council has considered its planning analysis and engagement regarding the location(s) of a site of this nature, and indeed any other key developments that impact its local settled communities.

My guiding principles are that any proposals for decision making should be considered in an open, honest, fair, inclusive and transparent way that appropriately recommends a suitable location(s). Any Council recommendation should be objective in its interest (not subjective); make the best use of tax-payers money, support the interest of the local community and thus offer a consistent, well informed and non-prejudiced recommendation.

On this basis I propose the Cowling Farm site is rejected for incongruous reasons and would like to identify that the Council have consequently made the wrong choice in their preferred option. I would therefore request that the Inspector concludes that this entire element of the Chorley Local Plan (CLP) is UNSOUND.

I cannot find any reference as to how you arrived at the decision to nominate Cowling Farm as the preferred site. From your graphical appraisal of the 9 sites I find there is little or no difference between sites 1 to 3 except that the Yarrow Bridge site is described as brownfield land within Green Belt.

Question - why is the area outlined in red at Yarrow Bridge separated from the land approaching the site from the A6. This land was previously used in its entirety as can be clearly seen from the photograph. This land is surrounded by mature trees which screen it from all directions. It is flat and the 0.63ha is adequate for the use stated with some overspill. Most importantly - this site prevents excessive occupancy by GTTS.

To use the Cowing Farm site when only 0.4ha is required for the stated purpose seems...
ludicrous and would therefore greatly reduce its value for any prospective developer and would be a blot on the landscape.

You state that there are no issues with this site from the southern approach, this is patently untrue. The chicane and bend in the road opposite the Black Horse are already an issue and that the Travellers vehicles can be up to 15 metres in length and mobile homes up to 25 metres, which when towed come to more than 40 metres in total. This could make the bend at the Black Horse difficult if not impossible to negotiate. You cannot expect GTTS traffic to come only from the north.

4(1): Legally compliant? No
4(2): Sound? No
5(1): Not positively prepared? ✔
5(2): Not justified? ✔
5(3): Not effective? ✔
5(4): Not consistent with national policy? ✔

The following points act as a high level précis to ‘set out’ and identify key points that the publically available Council document(s) for consideration (and process) are deemed considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or sound proposal.

It must first be noted that the format of this representation form is extremely difficult for a ‘layman’ to complete in line with the aforementioned criteria. Subsequent observations and assertions will try and highlight linkage to the Council’s framework but there are a number of points that appear to cover a number of criteria.

1. In the Council forming its ‘preferred option’ / recommendation I believe the consultation process executed has been inadequate and is in Legal breach of the Localism Act 2011 which requires Councils to both notify and consult local settled communities in respect of this type of development before publishing its proposals (Supporting Evidence also Identified in Appendix 1).
1.1. The Localism Act 2011 became law on 15th November 2011 when it received Royal assent; breaches of the Act are therefore illegal. As a member of the settled community I do not see any evidence that the Council has taken the Act into account in its decision to identify a preferred site.
1.2. Further the Council is in breach of the Neighbourhood Planning (General) Regulations 2012 which states that “……before submitting a plan proposal to the local planning authority, a qualifying body must…….publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area”.
1.3. With above in mind, community engagement should provide an opportunity for everyone to contribute.
1.3.1. There is growing evidence that there are many residents within the ward who are still not aware of the Council’s proposals and thus feel discriminated against.
1.3.1.1. The Council has demonstrated significant failure to publicise in an open, transparent and inclusive manner with both its settled and Traveller communities. There has been a distinct lack of appropriate stakeholder notification and meaningful involvement. Despite a number of alleged previous ‘consultation’ periods large sections of the settled community were surprised to recently learn of a ‘preferred’ option having been determined. Particularly speaking as a local resident I was not aware that any options were being considered, and only recently (10th June) found out via word and mouth. I believe that a lack of engagement with interested parties renders the document inconsistent with the requirements of the NPPF.
1.3.1.2. Furthermore during this latest consultation period there have been examples
of inconsistencies towards the Council's approach to advise residents across the community or local employers for other designated sites, but NO consideration has been made to advise or ‘mail drop’ the local settled community by the Council of its ‘preferred site’. I am aware that Councillors representing other sites in the Chorley area have mail dropped and informed local residents.

1.3.1.2.1. There is NO clear evidence that the Council’s consultation process has engaged with local employers in the area. Had the Council done so it would have collected clear evidence that employment in the Cowling area of Chorley will be compromised if the Council proceeds with its proposal for its development for Gypsies, Travellers and Travelling Show People. Local entrepreneurs have also mentioned that it would also call into question the success of any future business expansion adjacent to Moorland Gate Business Park.

1.3.2. The representation form is not user friendly and has been ill considered. There is NO formal statement that other forms of representation are welcomed. There is NO evidence that the Council have considered diversity and inclusion principles to engage with our multi-cultural and multi-linguistic community (no translation of the form has been offered) for anyone wishing to make representation in any other language. Equally the form is not in any way user friendly and thus technically unusable, particularly due to legal references that would scare most individuals from completing and submitting the form, and categorise their arguments. Even if this form was usable it would discriminate against those who do not have access or are not able to use computers.

1.3.3. This lack of inclusive consultation and the engagement period also precludes any real opportunity to mobilise a “Neighbourhood Plan” or “Neighbourhood Forum” in time for the 16th July timeframe. As a settled member of the community I believe it should be our legal right to achieve this before the closing period of a consultation ~ 6 weeks is simply not enough time.

7: Necessary changes

Based on all the publically available information as previously asserted in the last section of this document; the Council’s lack of community engagement; its continuing failure to publicise; its lack of stakeholder notification, its failure to embrace the Localism Act 2011 and the knock-on effect on any future neighbourhood planning are all part of a growing body of evidence that the local settled community has been discriminated against.

These are the most serious of issues and hence I would appreciate that the Council withdraw its Preferred Options Document. The Council should then carry out a thorough open and transparent review of all the points mentioned and all actions carried out in relation to the Preferred Options Document to demonstrate appropriate engagement and legality.

I welcome a revised schedule of deadlines and a corrected and improved engagement process/methodology that reflects best practice be published to enable robust decision making in an open, honest, fair, inclusive and transparent way.

8: Participate in examination?  No

9: Reason participation necessary

Councils response

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy
on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- the land is owned by the Council and is deliverable and developable
- dedicated access is achievable
- the land is within the settlement of Chorley and accessible to services and facilities
- it has the potential to meet the needs of the existing Traveller community at Hut Lane
- the site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- it is sustainable, scoring B and would be compliant with the Core Strategy key policies
- the land is allocated for housing and employment, therefore the principal of housing development is established

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The site is a previously developed site in the Green Belt and it is considered that there are no exceptional circumstances that warrant its release for development, hence it is not a 'preferred' site.

The Environment Agency has confirmed the site boundary of Site 2: Yarrow Bridge is not located in Flood Zone 2 (medium probability of flooding), although the access road to the site from Bolton Road (A6) would be. Therefore the Environment Agency advise that no vulnerable part of the development, which in this case would be caravans, should be located in Flood Zone 2. Provided that this is adhered to, the Environment Agency are satisfied that the intended use of the site would not be an unacceptable level of flood risk.

The Preferred Options document refers to 9.5 hectares. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- community engagement between the settled and Traveller community.
- the masterplanning process.
- Highways options in relation to the delivery of the mixed use site.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31-32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new
access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Individual councillors have consulted in their wards as they saw fit. The Council has had no influence on this. Cllrs Bradley, Murray and Walmsley jointly submitted a representation on behalf of those who had made known their concerns about the proposed Yarrow Bridge Site.

Comments have been submitted and considered regardless of whether or not they use the representations form. The representation form and guidance notes provides information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning Policy Framework. On request the Council are amenable to translating a document or form into a language. No request was made or received. The Council considers the process of arriving at an allocation to be legally compliant and sound.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be
devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Localism Act also introduced a new right for communities to draw up a neighbourhood plan. Provided a neighbourhood development plan or order is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and with other legal requirements, local people will be able to vote on it in a referendum. If the plan is approved by a majority of those who vote, then the local authority will bring it into force.

The Preferred Options Consultation cannot be put on hold as the Council endorsed the approach and documents at Full Council on 3 June 2014 for 6 weeks consultation. The Council need to follow the Local Plan Inspector’s timetable and progress the Chorley Local Plan to adoption.
Title: Mr  First Name: David  Last Name: Robinson  Organisation:

Site/location
1. Cowling Farm

Paragraph/section

Modification

1: Evidence why available/ suitable/ achievable? No

2: Agree with preferred site? No

3: Comments on document
This preferred option seems to take little consideration of community cohesion/access to schools and public transport. Paragraph 6.9 - proximity to schools and public transport. Site 2 would offer significantly greater benefits than site 1. Also wider impact and effect - both physical/visual on adjacent Green Belt and community facilities. Site 1 will not be self contained and will be an eyesore, will attract others to camp nearby on Green Belt/open spaces/community facilities.

4(1): Legally compliant? Yes
4(2): Sound? Yes

5(1): Not positively prepared? No
5(2): Not justified? No
5(3): Not effective? No
5(4): Not consistent with national policy? No

6: Reasons not legally compliant/unsound
Assessment is sound. Preferred option proposal is flawed due to the lack of importance given to community cohesion - access to schools, public transport, wider impact on Green Belt.

8: Participate in examination? No

9: Reason participation necessary
Councils response
The Council is committed to ensuring community cohesion and will continue to work with the local community including the ‘temporary’ and permanent Traveller community and relevant stakeholders such as the police authority in respect of design and layout and community cohesion issues.
Access to schools has been considered as part of the sustainability appraisal and the Cowling Farm site scores highly. Whilst the Yarrow Bridge site may be closer to schools, this has to be considered in the context of 42 sustainability indicators. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.
Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:
• the land is owned by the Council and is deliverable and developable
• a dedicated access is achievable
• The land is within the settlement of Chorley and accessible to services and facilities
• It has the potential to meet the needs of the existing Traveller community at Hut Lane
• The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• It is sustainable, scoring B and would be compliant with the Core Strategy key policies
• The land is allocated for housing and employment, therefore the principle of housing development is established

The land is allocated for housing and employment; therefore the principle of development is established. There are a number of planning policies that seek to protect landscape amenity which would be applied to any application on this site and the site will also be subject to masterplanning.
I wish to strongly object to the development of Cowling Farm as the preferred Gypsy/Traveller site. My reasons for this objection are:

- Improper use of tax-payer’s money and inadequate clarification/validation of costs.
- Potential loss in value of existing land asset for redevelopment. Reduction in attractiveness of site for housing occupation.
- Potential damage to industrial development and therefore employment opportunities on Moorland Gate Business Park.
- Potential road safety issues, particularly on Weavers Brow if access is adjacent to Cowling Farm. Lancashire County Council Highways have already expressed reservations and from their comments appear to be assuming access to the site from Moorland Gate with traffic arriving via Cowling Brow. I believe this is a much less risky proposal than the Council proposal of an access point off Weavers Brow which is very hazardous, frequently subject to speeding, unlit and often restricted by parked cars on both sides of a blind bend leading to it. The southern access road through Limbrick village is narrow, winding and dangerous for large vehicles as well as restricted by an uncontrolled single track bridge. No comment on these issues appears in the Appraisal Matrix. Has the Highways Agency considered them in their assessment and if so why have they made no specific comments?
- Proposed manipulation of Green Belt designated land to create a new access road from Weavers Brow.
- Loss/misuse of good agricultural land and damage to the areas rural character.
- Unacceptable risk that using a small section of a larger site could lead to Gypsies illegally occupying the site to accommodate more members of their extended families and other transitory Travellers. This has happened on numerous well documented previous occasions around the country e.g. Dale Farm where Basildon Council in September 2011 gave the British firm of bailiffs, Constant and Co, the contract to clear 54 pitches from Dale Farm. In 2012 Basildon Council confirmed that the Dale Farm eviction cost them £4.8 million. In addition Essex Police announced that its costs were £2.4 million. How does Chorley Council propose to mitigate this risk and what contingency costs, if any, have been included in the budget?
- Local discussion with 'Hut Lane Travellers' has indicated a significant number of transitory Travellers are viewing any Traveller site at Cowling Farm as an opportunity for them to occupy without permission.
- Department for Communities and Local Government document dated August 2013: 'Dealing with illegal and unauthorised encampments' A summary of available powers States: 'If a local site is particularly vulnerable and intelligence suggests it is going to be targeted for unauthorised camping, causing disruption to others going about their day-to-day lives, local authorities could consider applying to the courts for a pre-emptive injunction preventing unauthorised camping (and/or protests) in a defined geographical area.' In view of the risk being created and intelligence suggesting Cowling Farm would be targeted has the Council taken this into consideration and would not the more prudent/sensible decision be to avoid the risk by selecting a site which does not provide opportunity for illegal expansion?
- Failure by the Council to follow a transparent, fair and proper process. Lack of meaningful consultation with the settled community prior to selection of a preferred
site. Ignorance and/or disregard of Localism Act 2011 relating to good practice for achieving community engagement.

- Inaccuracies, factual mistakes and unsubstantiated cost estimates in the Council's potential Traveller Sites comparison tables. In addition no overall risk assessment of each proposed site appears to have been carried out (ref illegal expansion stated above.) When carried out correctly the Sustainability Appraisal matrix demonstrates that not only is the Cowling Farm site the most expensive, highest risk of future abuse it also scores less preferable than: Cabbage Hall Fields, Ackhurst Road and Yarrow Bridge depot.

- Heath Charnock is a dispersed settlement on the southern rural edge of Chorley where development proposals should be considered very carefully. This proposed site would ruin the character of the area, damage community cohesion and negatively impact the social/recreational provision in the area. The proposed location of the site is particularly ill-considered: it is on a greenfield site next to amenities used by many residents and visitors for recreation, sport and walking dogs.

- The proposed site and southern access point are close to and detrimental to a Grade 2 listed building.

- The undulating and sloping topography of the site is unsuitable for location and movement of caravans. The risk would be magnified if illegal occupation were to take place. Significant action and/or cost would be associated with overcoming this issue which it is unclear has been seriously considered by the Council officers. Choice of a site with such risks is inconsistent with the Communities and Local Government Good Practice Guide for Designing Gypsy and Traveller Sites.

- Refusal of Council to take meaningful notice of 'Hut Lane Traveller' preferences for a small site which is easy for them to 'police' and maintain. Most of their proposals were dismissed by the planning officer as not for further consideration. However the Yarrow Bridge site was proposed by the Hut Lane Travellers as suitable for their requirements. This does not appear to have carried any weight in the Matrix assessment.

- I have been informed that the Yarrow Bridge depot site has been used historically (albeit without permission) by Travellers. In addition it is unclear from information available which elements of the Yarrow Bridge depot site are included in the assessment. Does the proposal include the Council depot element which is already partially hard surfaced and appears to be under utilised/not utilised? If this is included how is the cost of £550,000 justified compared to £560,000 for Cowling Farm which has nothing and even requires a completely new access road?

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared?  
5(2): Not justified?  
5(3): Not effective?  
5(4): Not consistent with national policy?
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councls response

Cowling Farm is the most expensive option, along with Harrison's Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the
remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation Document.

The site is large enough for a range of uses. The land is allocated for a mix of housing and employment in the Chorley Local Plan 2012-2026 and it will remain a significant land asset. Land for the Gypsy and Traveller site will be discounted from the allocated areas. This is acceptable because the Inspector (Dr Bussey -18 January 2014) stated "In principle I consider that the re-allocation of some existing housing and/or employment sites for Gypsy and Traveller purposes would be acceptable. Although this may have implications in relation to the need for updated evidence, consultation and SA".

The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:
- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.

The Council considers that actual or perceived impact on property value and businesses is not a material planning consideration.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The land is allocated for housing and employment; therefore the principle of development is established. There are a number of planning policies that seek to protect landscape amenity and the Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development. There are a number of planning policies that seek to
protect landscape amenity which would be applied to any application on this site and the site will also be subject to masterplanning.

The site is owned by the Council. Therefore, the Council will be able to control the use of the site and take action against any unauthorised encampments. The Council has a protocol in place to deal with unauthorised encampments and has enforcement powers to deal with such sites.

The Council has progressed this proposed allocation in full accordance with its Statement of Community Involvement. The volume of representations received demonstrates how 'engaged' the local community has been in this work.

Comments in respect of inconsistencies are noted. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is in the same SA band as Cabbage Hall Fields, Ackhurst Road and Yarrow Bridge Depot. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding Allocation. A number of other factors such as deliverability need to be taken into consideration.

The land is allocated for housing and employment; therefore the principle of development on the site is established. There are a number of planning policies that seek to protect landscape amenity and the Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:
• The contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
• The impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
• How any harm might be removed or reduced
• The impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will
impact upon its setting.

The Cowling Farm site has an undulating topography, but is a far larger site that is flat in part and is not subject to the constraints that affect the other Chorley Town sites. The masterplanning process itself would ensure that residents are able to fully participate in the delivery of a Traveller site and the allocated housing and employment. Working with key stakeholders, including the local residences and businesses, the Travelling community and the police architectural liaison officer, an appropriate access, location, design and layout could be arrived at.

The representations submitted by the consultant on behalf of the family living on site at Hut Lane express a preference for Hut Lane, but in terms of the alternative sites they prefer Cowling Farm, which is the Council's preferred site.

Further details about costing's in relation to the Yarrow Bridge site and other sites are provided in the Proposed Allocation document - See Appendix 5.
### Title:
Mrs

### First Name:
Susan

### Last Name:
Jones

### Organisation:

<table>
<thead>
<tr>
<th>Site/location</th>
<th>1. Cowling Farm</th>
</tr>
</thead>
</table>

#### Paragraph/section

#### Modification

1: Evidence why available/suitable/achievable?

2: Agree with preferred site?

3: Comments on document

I wish to strongly object to the development of Cowling Farm as the preferred Gypsy/Traveller site. My reasons for this objection are:

- Improper use of tax-payer’s money and inadequate clarification/validation of costs.
- Potential loss in value of existing land asset for redevelopment. Reduction in attractiveness of site for housing occupation.
- Potential damage to industrial development and therefore employment opportunities on Moorland Gate Business Park.
- Potential road safety issues, particularly on Weavers Brow if access is adjacent to Cowling Farm. Lancashire County Council Highways have already expressed reservations and from their comments appear to be assuming access to the site from Moorland Gate with traffic arriving via Cowling Brow. I believe this is a much less risky proposal than the Council proposal of an access point off Weavers Brow which is very hazardous, frequently subject to speeding, unlit and often restricted by parked cars on both sides of a blind bend leading to it. The southern access road through Limbrick village is narrow, winding and dangerous for large vehicles as well as restricted by an uncontrolled single track bridge. No comment on these issues appears in the Appraisal Matrix. Has the Highways Agency considered them in their assessment and if so why have they made no specific comments?
- Proposed manipulation of Green Belt designated land to create a new access road from Weavers Brow.
- Loss/misuse of good agricultural land and damage to the areas rural character.
- Unacceptable risk that using a small section of a larger site could lead to Gypsies illegally occupying the site to accommodate more members of their extended families and other transitory Travellers. This has happened on numerous well documented previous occasions around the country e.g. Dale Farm where Basildon Council in September 2011 gave the British firm of bailiffs, Constant and Co, the contract to clear 54 pitches from Dale Farm. In 2012 Basildon Council confirmed that the Dale Farm eviction cost them £4.8 million. In addition Essex Police announced that its costs were £2.4 million. How does Chorley Council propose to mitigate this risk and what contingency costs, if any, have been included in the budget?
- Local discussion with 'Hut Lane Travellers' has indicated a significant number of transitory Travellers are viewing any Traveller site at Cowling Farm as an opportunity for them to occupy without permission.
- Department for Communities and Local Government document dated August 2013: 'Dealing with illegal and unauthorised encampments' A summary of available powers States: 'If a local site is particularly vulnerable and intelligence suggests it is going to be targeted for unauthorised camping, causing disruption to others going about their day-to-day lives, local authorities could consider applying to the courts for a pre-emptive injunction preventing unauthorised camping (and/or protests) in a defined geographical area.' In view of the risk being created and intelligence suggesting Cowling Farm would be targeted has the Council taken this into consideration and would not the more prudent/sensible decision be to avoid the risk by selecting a site which does not provide opportunity for illegal expansion?
- Failure by the Council to follow a transparent, fair and proper process. Lack of meaningful consultation with the settled community prior to selection of a preferred...
Ignorance and/or disregard of Localism Act 2011 relating to good practice for achieving community engagement.
-Inaccuracies, factual mistakes and unsubstantiated cost estimates in the Council’s potential Traveller Sites comparison tables. In addition no overall risk assessment of each proposed site appears to have been carried out (ref illegal expansion stated above.) When carried out correctly the Sustainability Appraisal matrix demonstrates that not only is the Cowling Farm site the most expensive, highest risk of future abuse it also scores less preferable than: Cabbage Hall Fields, Ackhurst Road and Yarrow Bridge depot.
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4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
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5(3): Not effective? □
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Councils response
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- The contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
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employment. Working with key stakeholders, including the local residences and businesses, the Travelling community and the police architectural liaison officer, an appropriate access, location, design and layout could be arrived at.

The representations submitted by the consultant on behalf of the family living on site at Hut Lane express a preference for Hut Lane, but in terms of the alternative sites they prefer Cowling Farm, which is the Council’s preferred site.

Further details about costing's in relation to the Yarrow Bridge site and other sites are provided in the Proposed Allocation document - See Appendix 5.
I believe there is a significant and growing body of evidence that identifies that Cowling Farm site is NOT available, suitable and achievable due to the factors summarised in section 6 of this representation. This view is based on careful consideration of the Chorley Local Plan 2012 – 26, Gypsy and Travellers and Travelling Showpeople Preferred Options, Statement of Consultation Supplement: Regulation 22, (1) (c) Report and other publically available Council documents. I believe that the publicly available documents and process that the Council has used for a vehicle for decision making are considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or ‘sound’ proposal and therefore the preferred option has to be considered unsound. Please see section 6 for specific issues.

2: Agree with preferred site?
No

3: Comments on document
There are some key assertions identified in attached and below that identify significant breaches in legal compliancy of the Chorley Council’s ‘Preferred Options Report’. Significant concerns in the consultation approach have been identified that put into question the Councils entire assessment and approach across all sites and comprehensively challenge both the “Legal Compliance” and the “Soundness” of the report ~ against all sub categories identified by the Council (Positively Prepared, Justified, Effective and consistent with National Policy)

I would also like to make it perfectly clear that all points raised in this representation are intended to be non-discriminatory. The issues identified do not challenge the spirit of creating a Gypsy and Traveller site; they do however aim to challenge how Chorley Council has considered its planning analysis and engagement regarding the location(s) of a site of this nature, and indeed any other key developments that impact its local settled communities.

My guiding principles are that any proposals for decision making should be considered in an open, honest, fair, inclusive and transparent way that appropriately recommends a suitable location(s). Any Council recommendation should be objective in its interest (not subjective); make the best use of tax-payers money, support the interest of the local community and thus offer a consistent, well informed and non-prejudiced recommendation.

On this basis I propose the Cowling Farm site is rejected for incongruous reasons and would like to identify that the Council have consequently made the wrong choice in their preferred option. I would therefore request that the Inspector concludes that this entire element of the Chorley Local Plan (CLP) is UNSOUND.

4(1): Legally compliant?
No

4(2): Sound?
No

5(1): Not positively prepared? ✓

5(2): Not justified? ✓

5(3): Not effective? ✓

5(4): Not consistent with national policy? ✓

6: Reasons not legally compliant/unsound
The following points act as a high level précis to ‘set out’ and identify key points that the publically available Council document(s) for consideration (and process) are
It must first be noted that the format of this representation form is extremely difficult for a ‘layman’ to complete in line with the aforementioned criteria. Subsequent observations and assertions will try and highlight linkage to the Council’s framework but there are a number of points that appear to cover a number of criteria.

1. In the Council forming its ‘preferred option’ / recommendation I believe the consultation process executed has been inadequate and is in Legal breach of the Localism Act 2011 which requires Councils to both notify and consult local settled communities in respect of this type of development before publishing its proposals (Supporting Evidence also Identified in Appendix 1).

1.1. The Localism Act 2011 became law on 15th November 2011 when it received Royal assent; breaches of the Act are therefore illegal. As a member of the settled community I do not see any evidence that the Council has taken the Act into account in its decision to identify a preferred site.

1.2. Further the Council is in breach of the Neighbourhood Planning (General) Regulations 2012 which states that “……before submitting a plan proposal to the local planning authority, a qualifying body must……..publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area”.

1.3. With above in mind, community engagement should provide an opportunity for everyone to contribute.

1.3.1. There is growing evidence that there are many residents within the ward who are still not aware of the Council’s proposals and thus feel discriminated against.

1.3.1.1. The Council has demonstrated significant failure to publicise in an open, transparent and inclusive manner with both its settled and Traveller communities. There has been a distinct lack of appropriate stakeholder notification and meaningful involvement. Despite a number of alleged previous ‘consultation’ periods large sections of the settled community were surprised to recently learn of a ‘preferred’ option having been determined. Particularly speaking as a local resident I was not aware that any options were being considered, and only recently (10th June) found out via word and mouth. I believe that a lack of engagement with interested parties renders the document inconsistent with the requirements of the NPPF.

1.3.1.2. Furthermore during this latest consultation period there have been examples of inconsistencies towards the Councils approach to advise residents across the community or local employers for other designated sites, but NO consideration has been made to advise or ‘mail drop’ the local settled community by the Council of its ‘preferred site’. I am aware that Councillors representing other sites in the Chorley area have mail dropped and informed local residents.

1.3.1.2.1. There is NO clear evidence that the Council’s consultation process has engaged with local employers in the area. Had the Council done so it would have collected clear evidence that employment in the Cowling area of Chorley will be compromised if the Council proceeds with its proposal for its development for Gypsies, Travellers and Travelling Show People. Local entrepreneurs have also mentioned that it would also call into question the success of any future business expansion adjacent to Moorland Gate Business Park.

1.3.2. The representation form is not user friendly and has been ill considered. There is NO formal statement that other forms of representation are welcomed. There is NO evidence that the Council have considered diversity and inclusion principles to engage with our multi-cultural and multi-linguistic community (no translation of the form has been offered) for anyone wishing to make representation in any other language. Equally the form is not in any way user friendly and thus technically unusable, particularly due to legal references that would scare most individuals from completing and submitting the form, and categorise their arguments. Even if this form was usable it would discriminate against those who do not have access or are not able to use
computers.

1.3.3. This lack of inclusive consultation and the engagement period also precludes any real opportunity to mobilise a “Neighbourhood Plan” or “Neighbourhood Forum” in time for the 16th July timeframe. As a settled member of the community I believe it should be our legal right to achieve this before the closing period of a consultation ~ 6 weeks is simply not enough time.

7: Necessary changes

Based on all the publically available information as previously asserted in the last section of this document; the Council’s lack of community engagement; its continuing failure to publicise; its lack of stakeholder notification, its failure to embrace the Localism Act 2011 and the knock-on effect on any future neighbourhood planning are all part of a growing body of evidence that the local settled community has been discriminated against.

These are the most serious of issues and hence I would appreciate that the Council withdraw its Preferred Options Document. The Council should then carry out a thorough open and transparent review of all the points mentioned and all actions carried out in relation to the Preferred Options Document to demonstrate appropriate engagement and legality.

I welcome a revised schedule of deadlines and a corrected and improved engagement process/methodology that reflects best practice be published to enable robust decision making in an open, honest, fair, inclusive and transparent way.

8: Participate in examination? No

9: Reason participation necessary

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Comments have been submitted and considered regardless of whether or not they use the representations form. The representation form and guidance notes provides information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning Policy Framework. On request the Council are amenable to translating a document or form into a language. No request was made or received.

The Council considers the process of arriving at an allocation to be legally compliant and sound.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community
involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Localism Act also introduced a new right for communities to draw up a neighbourhood plan. Provided a neighbourhood development plan or order is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and with other legal requirements, local people will be able to vote on it in a referendum. If the plan is approved by a majority of those who vote, then the local authority will bring it into force.

The Preferred Options Consultation cannot be put on hold as the Council endorsed the approach and documents at Full Council on 3 June 2014 for 6 weeks consultation. The Council need to follow the Local Plan Inspector’s timetable and progress the Chorley Local Plan to adoption.
I believe there is a significant and growing body of evidence that identifies that Cowling Farm site is NOT available, suitable and achievable due to the factors summarised in section 6 of this representation. This view is based on careful consideration of the Chorley Local Plan 2012 – 26, Gypsy and Travellers and Travelling Showpeople Preferred Options, Statement of Consultation Supplement: Regulation 22, (1) (c) Report and other publically available Council documents. I believe that the publicly available documents and process that the Council has used for a vehicle for decision making are considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or ‘sound’ proposal and therefore the preferred option has to be considered unsound. Please see section 6 for specific issues.

There are some key assertions identified in attached and below that identify significant breaches in legal compliancy of the Chorley Council’s ‘Preferred Options Report’. Significant concerns in the consultation approach have been identified that put into question the Councils entire assessment and approach across all sites and comprehensively challenge both the “Legal Compliance” and the “Soundness” of the report ~ against all sub categories identified by the Council (Positively Prepared, Justified, Effective and consistent with National Policy)

I would also like to make it perfectly clear that all points raised in this representation are intended to be non-discriminatory. The issues identified do not challenge the spirit of creating a Gypsy and Traveller site; they do however aim to challenge how Chorley Council has considered its planning analysis and engagement regarding the location(s) of a site of this nature, and indeed any other key developments that impact its local settled communities.

My guiding principles are that any proposals for decision making should be considered in an open, honest, fair, inclusive and transparent way that appropriately recommends a suitable location(s). Any Council recommendation should be objective in its interest (not subjective); make the best use of tax-payers money, support the interest of the local community and thus offer a consistent, well informed and non-prejudiced recommendation.

On this basis I propose the Cowling Farm site is rejected for incongruous reasons and would like to identify that the Council have consequently made the wrong choice in their preferred option. I would therefore request that the Inspector concludes that this entire element of the Chorley Local Plan (CLP) is UNSOUND.

The following points act as a high level précis to ‘set out’ and identify key points that the publically available Council document(s) for consideration (and process) are
deemed considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or sound proposal.

It must first be noted that the format of this representation form is extremely difficult for a ‘layman’ to complete in line with the aforementioned criteria. Subsequent observations and assertions will try and highlight linkage to the Council’s framework but there are a number of points that appear to cover a number of criteria.

1. In the Council forming its ‘preferred option’ / recommendation I believe the consultation process executed has been inadequate and is in Legal breach of the Localism Act 2011 which requires Councils to both notify and consult local settled communities in respect of this type of development before publishing its proposals (Supporting Evidence also Identified in Appendix 1).

   1.1. The Localism Act 2011 became law on 15th November 2011 when it received Royal assent; breaches of the Act are therefore illegal. As a member of the settled community I do not see any evidence that the Council has taken the Act into account in its decision to identify a preferred site.

   1.2. Further the Council is in breach of the Neighbourhood Planning (General) Regulations 2012 which states that “……before submitting a plan proposal to the local planning authority, a qualifying body must…….publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area”.

   1.3. With above in mind, community engagement should provide an opportunity for everyone to contribute.

   1.3.1. There is growing evidence that there are many residents within the ward who are still not aware of the Council’s proposals and thus feel discriminated against.

   1.3.1.1. The Council has demonstrated significant failure to publicise in an open, transparent and inclusive manner with both its settled and Traveller communities. There has been a distinct lack of appropriate stakeholder notification and meaningful involvement. Despite a number of alleged previous ‘consultation’ periods large sections of the settled community were surprised to recently learn of a ‘preferred’ option having been determined. Particularly speaking as a local resident I was not aware that any options were being considered, and only recently (10th June) found out via word and mouth. I believe that a lack of engagement with interested parties renders the document inconsistent with the requirements of the NPPF.

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   1.3.1.2.1. There is NO clear evidence that the Council’s consultation process has engaged with local employers in the area. Had the Council done so it would have collected clear evidence that employment in the Cowling area of Chorley will be compromised if the Council proceeds with its proposal for its development for Gypsies, Travellers and Travelling Show People. Local entrepreneurs have also mentioned that it would also call into question the success of any future business expansion adjacent to Moorland Gate Business Park.

1.3.2. The representation form is not user friendly and has been ill considered. There is NO formal statement that other forms of representation are welcomed. There is NO evidence that the Council have considered diversity and inclusion principles to engage with our multi-cultural and multi-linguistic community (no translation of the form has been offered) for anyone wishing to make representation in any other language. Equally the form is not in any way user friendly and thus technically unusable, particularly due to legal references that would scare most individuals from completing and submitting the form, and categorise their arguments. Even if this form was usable it would discriminate against those who do not have access or are not able to use...
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1.3.3. This lack of inclusive consultation and the engagement period also precludes any real opportunity to mobilise a “Neighbourhood Plan” or “Neighbourhood Forum” in time for the 16th July timeframe. As a settled member of the community I believe it should be our legal right to achieve this before the closing period of a consultation ~ 6 weeks is simply not enough time.

7: Necessary changes

Based on all the publically available information as previously asserted in the last section of this document; the Council’s lack of community engagement; its continuing failure to publicise; its lack of stakeholder notification, its failure to embrace the Localism Act 2011 and the knock-on effect on any future neighbourhood planning are all part of a growing body of evidence that the local settled community has been discriminated against.

These are the most serious of issues and hence I would appreciate that the Council withdraw its Preferred Options Document. The Council should then carry out a thorough open and transparent review of all the points mentioned and all actions carried out in relation to the Preferred Options Document to demonstrate appropriate engagement and legality.

I welcome a revised schedule of deadlines and a corrected and improved engagement process/methodology that reflects best practice be published to enable robust decision making in an open, honest, fair, inclusive and transparent way.

8: Participate in examination?

9: Reason participation necessary

Councils response

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Individual councillors have consulted in their wards as they saw fit. The Council has had no influence on this. 23.Cllrs Bradley, Murray and Walmsley jointly submitted a representation on behalf of those who had made known their concerns about the proposed Yarrow Bridge Site.

Comments have been submitted and considered regardless of whether or not they use the representations form. The representation form and guidance notes provides information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning Policy Framework. On request the Council are amenable to translating a document or form into a language. No request was made or received.

The Council considers the process of arriving at an allocation to be legally compliant and sound.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning
applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

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There are many serious issues/irregularities in the Council’s handling in this matter. Failure to follow Localism Act 2011. Failure to notify the residents in the Cowling Farm
area. I understand this is something to do with prejudice towards the Gypsy community and yet the leader of the Chorley East ward has notified his. Your online form discriminates against those who do not have a computer or IT literate.

The following points act as a high level précis to ‘set out’ and identify key points that the publically available Council document(s) for consideration (and process) are deemed considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or sound proposal.

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I welcome a revised schedule of deadlines and a corrected and improved engagement process/methodology that reflects best practice be published to enable robust decision making in an open, honest, fair, inclusive and transparent way.

8: Participate in examination?

9: Reason participation necessary

Councils response

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

• the land is owned by the Council and is deliverable and developable
• a dedicated access is achievable
• the land is within the settlement of Chorley and accessible to services and facilities
• it has the potential to meet the needs of the existing Traveller community at Hut Lane
• the site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• it is sustainable, scoring B and would be compliant with the Core Strategy key policies
• the land is allocated for housing and employment, therefore the principle of housing development is established.
The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Information on sites for development has been gathered from various sources over a number of years:
- The first call for sites was carried out by Chorley Council for a six week period in September/October 2005.
- The second was carried out jointly with Preston and South Ribble Councils for a six week period in July/August 2007. Landowners and developers were invited to put forward land for consideration for development.
- A further community survey relating to site suggestions ended on the 26th January 2010. The intention of this exercise was to ascertain whether the community felt that there were sites that would be particularly suitable for non-built development e.g. sport and recreation or conversely be protected from changes of use. After this deadline the Council continued to accept other site suggestions.
- The January 2010 community survey consultation resulted in a site for travelling Showpeople being suggested at Yarrow Bridge. This is one site now out for consultation.
- The Issues and Options Discussion paper brought together results of the ‘call for sites’ exercise and was the first proposals stage of the Site Allocation and Policies paper (now Chorley Local Plan). Consultation ran from December 2010 until February 2011.

Following the above the Local Plan went through further stages:
- The Preferred Option consultation on the Site Allocation and Development Management Policies ran from 16 September 2011 and was originally planned to end on the 28 October 2011 however this was extended by three weeks to the 18 November 2011 due to the amount of public interest it generated.
- The Publication deposit stage of the Chorley Local Plan 2012-2026 (previously referred to as the Site Allocation and Development Management Policies Development Plan Document) ran from 19 October 2012 for six weeks to 30 November 2012.
- The Local Plan was submitted to the Planning Inspectorate in December 2012 and the Examination was held in April 2013.

Furthermore the Council undertook consultation with Gypsy, Traveller and Travelling Showpeople themselves and engagement with relevant stakeholders and Chorley’s temporary Traveller and permanent residents as part of the Central Lancashire Gypsy and Traveller Accommodation Assessment (GTAA - summer 2013 and still ongoing). Gypsy and Traveller and Travelling Showpeople Assessment (GTAA) matters have been reported to the Central Lancashire Joint Advisory Committee over a number of years. All the above Local Plan stages have also been reported to Chorley’s Executive Cabinet as part of the plan making process and on-going consultation. Elected members have endorsed this approach at Full Council.
The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

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The Preferred Options Consultation could not be put on hold as the Council endorsed the approach and documents at Full Council on 3 June 2014 for 6 weeks consultation. The Council is required to follow the Local Plan Inspector’s timetable and progress the Chorley Local Plan to adoption.
I strongly oppose the Cowling Farm site for the Gypsy site. I have visited the Rivington area for many years and feel it would be detrimental to the whole area of Heath Charnock, Limbrick and Rivington.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council's proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

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- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
- It is sustainable, scoring B and would be compliant with the Core Strategy key policies
- The land is allocated for housing and employment, therefore the principle of housing development is established.
I am writing to object to the Chorley Council Planning proposal to use Cowling Farm as a Gypsy/Traveller site on the following grounds:

- The way in which Chorley Council has gone about informing the surrounding communities of their plans is disgraceful and in my opinion downright underhand and a breach of the Localism Act 2011. Whether the intention to develop the land as a Gypsy site or for houses or industrial, you should not have to hear of such a development from your neighbour or on the ‘grapevine’ it would seem Cowling Farm is your preferred site due to its more rural position and therefore you expect to receive little or less opposition due to the low population in the area.

- The Council are quite happy to use ‘Green Belt’ land to make an access road to the site, but if I wanted to do that to access my property the answer would be an outright no. It would seem the Council are manipulating the rules to suit their own needs.

- Cowling Farm is a Grade II listed building and as such is part of our local heritage. We should be looking to protect and preserve the surrounding area of this building so not to spoil something of historical importance to the local people of Chorley and Lancashire.

- As a local to the area we know only too well the make-up of the land and its poor drainage capabilities. Extra costs will be incurred in order to make the land suitable for such use. We believe there are other sites in the plan which would be more suitable as they already have large areas of hard standing available.

- The visual impact of the site would also spoil this area of countryside which leads to Rivington, an area of outstanding natural beauty. We are losing so many of our Greenfields in England to new housing, new road networks and rail links, when will the government realise 'England's Green and Pleasant Land' is being spoiled. Someone needs to make a stand, why not let it be Chorley council. 'Say NO to losing our countryside'.

- A great concern is the total number of pitches that will be allowed. You say this is a mater to be discussed further down the line. Well I don’t think so! By not informing us of the number of pitches you intend to allow (except a minimum of 5) would seem like you are withholding information. You probably do know but don’t want to say for fear of an uproar. By not giving us this information we are unable to make an informed decision, but we can only think the worst, it could be 5 or it could be 50!.

- There are 9.5 hectares of land there in total, there is a great risk of the unallocated part being used unofficially by the Travellers. Should this happen how do you intend to deal with it. We know from past experience the police are reluctant to get involved and with cut backs don’t have the resources with what could be a mass invasion of Travellers, before you know it could be on the scale of Dale Farm, which in turn cost the taxpayer a great deal of money. Surely the site would be better placed on somewhere smaller where the risk of unofficial use would be much lower.

- Increased traffic flow to the area concerns me. On Long Lane now there are already a number of double decker coaches /buses using the road and just the other day I followed an articulated lorry which broke many substantial branches off trees leaving them in the pathway of other road users. There are a large number of cyclists and motorbikes which use the road on the way to Rivington. The volume of traffic does not need adding to further by caravans, this type of vehicle is unsuitable for this
narrow country road particularly in the Limbrick area where they will have to negotiate the narrow bridge and the double bends at Cockers Farm.

-As I understand the land is already earmarked for residential and industrial development so must be worth a lot of money to the Council if they were to sell it for this purpose. I don’t think a house builder will want to pay its full value if its next to a Gypsy site as the houses they build won’t be worth as much. Likewise businesses will not want to locate there. Already some tenants on Moorgate Industrial Estate say they will re-locate if the Gypsy site goes ahead. It would seem the Council will lose a lot of money if the plan goes ahead, not to mention that it already seems to be the most expensive option to create the site on anyway.

-Despite what you may have said in your reports the frequency of public transport is no more than twice a week. Children won’t be able to catch a bus to school the parents will have to take them, further increasing the traffic on Cowling Brow which at peak times is busy enough. Only a few weeks ago I witnessed an accident at the bottom of Cowling Brow/Crosse Hall Street and that is with the traffic calming measures already in place.

I have put forward my main concerns in this letter of objection, but there are many more. I hope you will re-consider your preferred option for this site, as your choice makes no sense, environmentally, socially and economically.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? ☐
5(2): Not justified? ☐
5(3): Not effective? ☐
5(4): Not consistent with national policy? ☐
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councillors response

The Council has progressed this proposed allocation in full accordance with its Statement of Community Involvement. The volume of representations received demonstrates how ‘engaged’ the local community has been in this work. The access to the proposed Gypsy and Traveller site has yet to be finalised.

Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are ‘not inappropriate in the Green Belt provided they preserve the openness of the Green Belt.
and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:

- The contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
- The impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
- How any harm might be removed or reduced
- The impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.

In terms of drainage, United Utilities have not objected to the principle of development on the site in terms of drainage issues. They have stated they would seek the disposal of surface water to be directed to the local river and foul effluent to be discharged into the Croston Trunk sewer, unless otherwise agreed in writing. Access to a clean water supply is also possible but will require further detailed discussions with United Utilities to agree.

The land is allocated for housing and employment therefore the principle of development is established. There are a number of planning policies that seek to protect landscape amenity and these will be complied with in any detailed planning application.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan. The site will be masterplanned to ensure that there is a balance of uses on the site.

The site is large enough for a range of uses. The land is allocated for a mix of housing and employment in the Chorley Local Plan 2012-2026 and it will remain a significant
Land asset. Land for the Gypsy and Traveller site will be discounted from the allocated areas. This is acceptable because the Inspector (Dr Bussey - 18 January 2014) stated "In principle I consider that the re-allocation of some existing housing and/or employment sites for Gypsy and Traveller purposes would be acceptable. Although this may have implications in relation to the need for updated evidence, consultation and SA". The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

• Community engagement between the settled and Traveller community.
• The masterplanning process.
• Highways options in relation to the delivery of the mixed use site.

Comments in respect of inconsistencies are noted. It is recognised that public transport is limited in this area. However, this has to be considered in the context of a total of 42 sustainability indicators. Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.
I am writing to object to the Chorley Council Planning proposal to use Cowling Farm as a Gypsy /Traveller site on the following grounds:

- The way in which Chorley Council has gone about informing the surrounding communities of their plans is disgraceful and in my opinion down right underhand and a breach of the Localism Act 2011. Whether the intention to develop the land as a Gypsy site or for houses or industrial, you should not have to hear of such a development from your neighbour or on the ‘grapevine’ it would seem Cowling Farm is your preferred site due to its more rural position and therefore you expect to receive little or less opposition due to the low population in the area.
- The Council are quite happy to use ‘Green Belt’ land to make an access road to the site, but if I wanted to do that to access my property the answer would be an outright no. It would seem the Council are manipulating the rules to suit their own needs.
- Cowling Farm is a Grade II listed building and as such is part of our local heritage. We should be looking to protect and preserve the surrounding area of this building so not to spoil something of historical importance to the local people of Chorley and Lancashire.
- As a local to the area we know only too well the make-up of the land and its poor drainage capabilities. Extra costs will be incurred in order to make the land suitable for such use. We believe there are other sites in the plan which would be more suitable as they already have large areas of hard standing available.
- The visual impact of the site would also spoil this area of countryside which leads to Rivington, an area of outstanding natural beauty. We are losing so many of our Greenfields in England to new housing, new road networks and rail links, when will the government realise 'England’s Green and Pleasant Land' is being spoiled. Someone needs to make a stand, why not let it be Chorley council. ‘Say NO to losing our countryside’.
- A great concern is the total number of pitches that will be allowed. You say this is a matter to be discussed further down the line. Well I don’t think so! By not informing us of the number of pitches you intend to allow (except a minimum of 5) would seem like you are withholding information. You probably do know but don’t want to say for fear of an uproar. By not giving us this information we are unable to make an informed decision, but we can only think the worst, it could be 5 or it could be 50!
- There are 9.5 hectares of land there in total, there is a great risk of the unallocated part being used unofficially by the Travellers. Should this happen how do you intend to deal with it. We know from past experience the police are reluctant to get involved and with cut backs don’t have the resources with what could be a mass invasion of Travellers, before you know it could be on the scale of Dale Farm, which in turn cost the taxpayer a great deal of money. Surely the site would be better placed on somewhere smaller where the risk of unofficial use would be much lower.
- Increased traffic flow to the area concerns me. On Long Lane now there are already a number of double decker coaches /buses using the road and just the other day I followed an articulated lorry which broke many substantial branches off trees leaving them in the pathway of other road users. There are a large number of cyclists and motorbikes which use the road on the way to Rivington. The volume of traffic does not need adding to further by caravans, this type of vehicle is unsuitable for this
narrow country road particularly in the Limbrick area where they will have to negotiate the narrow bridge and the double bends at Cockers Farm.

- As I understand the land is already earmarked for residential and industrial development so must be worth a lot of money to the Council if they were to sell it for this purpose. I don’t think a house builder will want to pay its full value if its next to a Gypsy site as the houses they build won’t be worth as much. Likewise businesses will not want to locate there. Already some tenants on Moorgate Industrial Estate say they will re-locate if the Gypsy site goes ahead. It would seem the Council will lose a lot of money if the plan goes ahead, not to mention that it already seems to be the most expensive option to create the site on anyway.

- Despite what you may have said in your reports the frequency of public transport is no more than twice a week. Children won’t be able to catch a bus to school the parents will have to take them, further increasing the traffic on Cowling Brow which at peak times is busy enough. Only a few weeks ago I witnessed an accident at the bottom of Cowling Brow/Crosse Hall Street and that is with the traffic calming measures already in place.

I have put forward my main concerns in this letter of objection, but there are many more. I hope you will re-consider your preferred option for this site, as your choice makes no sense, environmentally, socially and economically.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? ☐
5(2): Not justified? ☐
5(3): Not effective? ☐
5(4): Not consistent with national policy? ☐
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8.

Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:
• the land is owned by the Council and is deliverable and developable
• dedicated access is achievable
• the land is within the settlement of Chorley and accessible to services and facilities
• it has the potential to meet the needs of the existing Traveller community at Hut Lane
• the site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• it is sustainable, scoring B and would be compliant with the Core Strategy key
policies
• the land is allocated for housing and employment, therefore the principal of housing development is established

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific
area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:

- the contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
- the impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
- how any harm might be removed or reduced
- the impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place

The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.

United Utilities has undertaken a high level desk-top assessment of the sites in the Preferred Options document and has provided a general response with regards to the water and wastewater infrastructure that exists within these specific areas. For all sites, United Utilities would expect (unless it can be robustly demonstrated otherwise) sustainable, water-efficient, surface water management systems [SuDS] to be incorporated into the development design. For Site 1: Cowling Farm, United Utilities would seek the disposal of surface water to be directed to the local river and foul effluent to be discharged into the Croston Trunk sewer, unless otherwise agreed in writing. Access to a clean water supply is also possible but will require further detailed discussions with United Utilities to agree.

The Cowling Farm site is allocated for housing and employment in the Chorley local Plan and is within the settlement of Chorley, therefore the principal of housing development is established. Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria f) protects important natural habitats and landscape features such as mature trees and hedgerows. Policy BNE9: - Trees also protects trees. Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building.

There is no proposal to allow an 'influx of transient others'. The proposal is for a permanent site of a minimum of 5 pitches to meet an identified need for Traveller accommodation. The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling
Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The Preferred Options document refers to 9.5 hectares. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:
- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.

Comments in respect of inconsistencies are noted. The Cowling Farm site scores a Sustainability Assessment Band B and is therefore considered sustainable in terms of proximity to a range of services and facilities. It is recognised that public transport is limited in this area and the railway station is 1.61 to 2.4km away. However, this has to be considered in the context of a total of 42 sustainability indicators. See analysis section 8 of the Proposed Allocation document.
Title: Mr  First Name: Alan  Last Name: Platt  Organisation: Croston, Ulnes Walton & Ec

Site/location  1. Cowling Farm

Modification

1: Evidence why available/suitable/achievable?  
2: Agree with preferred site?  Yes
3: Comments on document
4(1): Legally compliant?  Yes
4(2): Sound?  Yes
5(1): Not positively prepared?  
5(2): Not justified?  
5(3): Not effective?  
5(4): Not consistent with national policy?  
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?  No
9: Reason participation necessary

Councils response  Support Noted for Cowling Farm site
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<th>Title:</th>
<th>Mr</th>
<th>First Name:</th>
<th>Alan</th>
<th>Last Name:</th>
<th>Platt</th>
<th>Organisation:</th>
<th>Croston, Ulnes Walton &amp; Ec</th>
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<tr>
<td>Site/location</td>
<td>1. Cowling Farm</td>
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Title: Mr  First Name: Alan  Last Name: Platt  Organisation: Croston, Ulnes Walton & Ec

Site/location  1. Cowling Farm

Paragraph/section

Modification

1: Evidence why available/suitable/achievable?  Yes
2: Agree with preferred site?  Yes
3: Comments on document

4(1): Legally compliant?  Yes
4(2): Sound?  Yes
5(1): Not positively prepared?  No
5(2): Not justified?  No
5(3): Not effective?  No
5(4): Not consistent with national policy?  No
6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?  No
9: Reason participation necessary

Councils response  Support noted for Cowling Farm site
Title: Mr  First Name: Kevin  Last Name: Brown  Organisation: 

Site/location  1. Cowling Farm

Paragraph/section

Modification

1: Evidence why available/suitable/achievable?
2: Agree with preferred site?
3: Comments on document

On behalf of Cowling Action Group please find attached a petition (signed by 327 people) from our local community and the nearby businesses and their employees to reject, object and make our view known in response to your document. Please ensure that all interested parties, including Lindsay Hoyle and our Local Councillors in Chorley East and Heath Charnock are made aware of this protest.

The undersigned individuals do not agree to the use of Cowling Farm area land by Chorley Council for accommodating Gypsy Travellers and therefore it should not be passed by the Inspector. Some of the key reasons for this include:

-Improper use of taxpayers money and loss in value of existing land asset.
-Cause of significant traffic, road safety and health and safety issues.
-Unacceptable manipulation/annexing of Green Belt designated land for site access.
-Damage to the areas rural character - this will promote the ruination of the Chorley gateway to the West Pennine Moors.
-Unacceptable risk that Gypsies from across the North West expand the site/adjacent land to Dale Farm proportions.
-Destruction of development and employment opportunities on Moorland Gate Business Park.
-More appropriate sites can be found elsewhere for much less cost e.g. Hut Lane Travellers want Yarrow Bridge site.
-Failure by the Council to follow a transparent, fair and proper process.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared?  □
5(2): Not justified?  □
5(3): Not effective?  □
5(4): Not consistent with national policy?  □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

Petition noted.

Cowling Farm is the most expensive option, along with Harrison’s Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the
Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation Document. The Cowling Farm site is large enough for a range of uses. The land is allocated for a mix of housing and employment in the Chorley Local Plan 2012-2026 and it will remain a significant land asset.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31-32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are ‘not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt’. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The land is allocated for housing and employment, therefore the principle of development on the site is established. There are a number of planning policies that seek to protect landscape amenity which would be applied to any application on this site and the site will also be subject to masterplanning.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. The site is in the control of the Council and will be subject to masterplanning to ensure an acceptable distribution of uses on site.

The Council considers that actual or perceived impact on property value and businesses is not a material planning consideration.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy.
on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:
• the land is owned by the Council and is deliverable and developable
• a dedicated access is achievable
• the land is within the settlement of Chorley and accessible to services and facilities
• it has the potential to meet the needs of the existing Traveller community at Hut Lane
• the site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• it is sustainable, scoring B and would be compliant with the Core Strategy key policies
• the land is allocated for housing and employment, therefore the principle of housing development is established.

The Council has progressed this proposed allocation in full accordance with its Statement of Community Involvement. The volume of representations received demonstrates how 'engaged' the local community has been in this work.
I believe there is a significant and growing body of evidence that identifies that Cowling Farm site is NOT available, suitable and achievable due to the factors summarised in section 6 of this representation. This view is based on careful consideration of the Chorley Local Plan 2012 – 26, Gypsy and Travellers and Travelling Showpeople Preferred Options, Statement of Consultation Supplement: Regulation 22, (1) (c) Report and other publically available Council documents. I believe that the publicly available documents and process that the Council has used for a vehicle for decision making are considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or ‘sound’ proposal and therefore the preferred option has to be considered unsound. Please see section 6 for specific issues.

There are some key assertions identified in attached and below that identify significant breaches in legal compliancy of the Chorley Council's 'Preferred Options Report'. Significant concerns in the consultation approach have been identified that put into question the Councils entire assessment and approach across all sites and comprehensively challenge both the “Legal Compliance” and the “Soundness” of the report ~ against all sub categories identified by the Council (Positively Prepared, Justified, Effective and consistent with National Policy)

I would also like to make it perfectly clear that all points raised in this representation are intended to be non-discriminatory. The issues identified do not challenge the spirit of creating a Gypsy and Traveller site; they do however aim to challenge how Chorley Council has considered its planning analysis and engagement regarding the location(s) of a site of this nature, and indeed any other key developments that impact its local settled communities.

My guiding principles are that any proposals for decision making should be considered in an open, honest, fair, inclusive and transparent way that appropriately recommends a suitable location(s). Any Council recommendation should be objective in its interest (not subjective); make the best use of tax-payers money, support the interest of the local community and thus offer a consistent, well informed and non-prejudiced recommendation.

On this basis I propose the Cowling Farm site is rejected for incongruous reasons and would like to identify that the Council have consequently made the wrong choice in their preferred option. I would therefore request that the Inspector concludes that this entire element of the Chorley Local Plan (CLP) is UNSOUND.

I object to the Chorley Council proposal to use Cowling Farm as their preferred site for the Gypsy/Traveller community for the following reasons:
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- Unacceptable manipulation/annexing of Green Belt designated land for site access.
- Damage to the areas rural character - this will promote the ruination of the Chorley gateway to the West Pennine Moors.
- Unacceptable risk that Gypsies from across the North West expand the site/adjacent land to Dale Farm proportions.
- Destruction of development and employment opportunities on Moorland Gate Business Park.
- More appropriate sites can be found elsewhere for much less cost e.g. Hut Lane Travellers want Yarrow Bridge site and planning law suggests that brownfield site (i.e. Yarrow Bridge, Cabbage Hall Fields and Ackhurst Road) should always be used before greenfield.

The following points act as a high level précis to ‘set out’ and identify key points that the publicly available Council document(s) for consideration (and process) are deemed considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or sound proposal.

It must first be noted that the format of this representation form is extremely difficult for a ‘layman’ to complete in line with the aforementioned criteria. Subsequent observations and assertions will try and highlight linkage to the Council’s framework but there are a number of points that appear to cover a number of criteria.

1. In the Council forming its ‘preferred option’ / recommendation I believe the consultation process executed has been inadequate and is in Legal breach of the Localism Act 2011 which requires Councils to both notify and consult local settled communities in respect of this type of development before publishing its proposals (Supporting Evidence also Identified in Appendix 1).

1.1. The Localism Act 2011 became law on 15th November 2011 when it received Royal assent; breaches of the Act are therefore illegal. As a member of the settled community I do not see any evidence that the Council has taken the Act into account in its decision to identify a preferred site.

1.2. Further the Council is in breach of the Neighbourhood Planning (General) Regulations 2012 which states that “……before submitting a plan proposal to the local planning authority, a qualifying body must……..publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area”.

1.3. With above in mind, community engagement should provide an opportunity for everyone to contribute.

1.3.1. There is growing evidence that there are many residents within the ward who are still not aware of the Council’s proposals and thus feel discriminated against.

1.3.1.1. The Council has demonstrated significant failure to publicise in an open, transparent and inclusive manner with both its settled and Traveller communities. There has been a distinct lack of appropriate stakeholder notification and meaningful involvement. Despite a number of alleged previous ‘consultation’ periods large sections of the settled community were surprised to recently learn of a ‘preferred’ option having been determined. Particularly speaking as a local resident I was not aware that any options were being considered, and only recently (10th June) found out via word and mouth. I believe that a lack of engagement with interested parties renders the document inconsistent with the requirements of the NPPF.

1.3.1.2. Furthermore during this latest consultation period there have been examples of inconsistencies towards the Councils approach to advise residents across the community or local employers for other designated sites, but NO consideration has been made to advise or ‘mail drop’ the local settled community by the Council of its
1.3.1.2.1. There is NO clear evidence that the Council’s consultation process has engaged with local employers in the area. Had the Council done so it would have collected clear evidence that employment in the Cowling area of Chorley will be compromised if the Council proceeds with its proposal for its development for Gypsies, Travellers and Travelling Show People. Local entrepreneurs have also mentioned that it would also call into question the success of any future business expansion adjacent to Moorland Gate Business Park.

1.3.2. The representation form is not user friendly and has been ill considered. There is NO formal statement that other forms of representation are welcomed. There is NO evidence that the Council have considered diversity and inclusion principles to engage with our multi-cultural and multi-linguistic community (no translation of the form has been offered) for anyone wishing to make representation in any other language. Equally the form is not in any way user friendly and thus technically unusable, particularly due to legal references that would scare most individuals from completing and submitting the form, and categorise their arguments. Even if this form was usable it would discriminate against those who do not have access or are not able to use computers.

1.3.3. This lack of inclusive consultation and the engagement period also precludes any real opportunity to mobilise a “Neighbourhood Plan” or “Neighbourhood Forum” in time for the 16th July timeframe. As a settled member of the community I believe it should be our legal right to achieve this before the closing period of a consultation ~ 6 weeks is simply not enough time.

7: Necessary changes

Based on all the publically available information as previously asserted in the last section of this document; the Council’s lack of community engagement; its continuing failure to publicise; its lack of stakeholder notification, its failure to embrace the Localism Act 2011 and the knock-on effect on any future neighbourhood planning are all part of a growing body of evidence that the local settled community has been discriminated against.

These are the most serious of issues and hence I would appreciate that the Council withdraw its Preferred Options Document. The Council should then carry out a thorough open and transparent review of all the points mentioned and all actions carried out in relation to the Preferred Options Document to demonstrate appropriate engagement and legality.

I welcome a revised schedule of deadlines and a corrected and improved engagement process/methodology that reflects best practice be published to enable robust decision making in an open, honest, fair, inclusive and transparent way.

8: Participate in examination? No

9: Reason participation necessary

Councils response

Objections and concerns about report noted. Cowling Farm is the most expensive option, along with Harrison’s Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation document.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate Business Park.
Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The land is allocated for housing and employment; therefore the principle of development is established. There are a number of planning policies that seek to protect landscape amenity and these will be complied with in any detailed planning application.

The Council considers that actual or perceived impact on businesses is not a material planning consideration.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- The land is owned by the Council and is deliverable and developable
- A dedicated access is achievable
- The land is within the settlement of Chorley and accessible to services and facilities
- It has the potential to meet the needs of the existing Traveller community at Hut Lane
- The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• It is sustainable, scoring B and would be compliant with the Core Strategy key policies
• The land is allocated for housing and employment, therefore the principle of housing development is established.

The Council has considered brownfield sites as part of this process, but as stated Cowling Farm is considered the most reasonable site when considered against the alternatives. National planning policy in the Framework encourages the re-use of brownfield land, but does not state that it should always be used before greenfield land.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Information on sites for development has been gathered from various sources over a number of years:
• The first call for sites was carried out by Chorley Council for a six week period in September/October 2005.
• The second was carried out jointly with Preston and South Ribble Councils for a six week period in July/August 2007. Landowners and developers were invited to put forward land for consideration for development.
• A further community survey relating to site suggestions ended on the 26th January 2010. The intention of this exercise was to ascertain whether the community felt that there were sites that would be particularly suitable for non-built development e.g. sport and recreation or conversely be protected from changes of use. After this deadline the Council continued to accept other site suggestions.
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Following the above the Local Plan went through further stages:
• The Preferred Option consultation on the Site Allocation and Development Management Policies ran from 16 September 2011 and was originally planned to end on the 28 October 2011 however this was extended by three weeks to the 18 November 2011 due to the amount of public interest it generated.
• The Publication deposit stage of the Chorley Local Plan 2012-2026 (previously referred to as the Site Allocation and Development Management Policies Development Plan Document) ran from 19 October 2012 for six weeks to 30 November 2012.
• The Local Plan was submitted to the Planning Inspectorate in December 2012 and
the Examination was held in April 2013.

Furthermore the Council undertook consultation with Gypsy, Traveller and Travelling Showpeople themselves and engagement with relevant stakeholders and Chorley’s temporary Traveller and permanent residents as part of the Central Lancashire Gypsy and Traveller Accommodation Assessment (GTAA - summer 2013 and still ongoing).

Gypsy and Traveller and Travelling Showpeople Assessment (GTAA) matters have been reported to the Central Lancashire Joint Advisory Committee over a number of years. All the above Local Plan stages have also been reported to Chorley’s Executive Cabinet as part of the plan making process and on-going consultation. Elected members have endorsed this approach at Full Council.

The Localism Act 2011 proposed mandatory pre-application consultation on large scale major applications with local communities before submitting planning applications for certain developments but to date this has not been enacted by the Secretary of State. This provision, yet to be brought into force, is not relevant to publicity for, and consultation upon, a proposed modification to a development plan document. The Council does encourage developers to incorporate community involvement into their development programme to allow for enough time to be devoted to involve the community in a particular scheme (The Statement of Community Involvement provides additional information on pre-application discussions). Should any application be forthcoming the Council will include appropriate pre-application community consultation.

The Localism Act also introduced a new right for communities to draw up a neighbourhood plan. Provided a neighbourhood development plan or order is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and with other legal requirements, local people will be able to vote on it in a referendum. If the plan is approved by a majority of those who vote, then the local authority will bring it into force.

The Preferred Options Consultation could not be put on hold as the Council endorsed the approach and documents at Full Council on 3 June 2014 for 6 weeks consultation. The Council is required to follow the Local Plan Inspector’s timetable and progress the Chorley Local Plan to adoption.
1: Evidence why available/suitable/achievable?

I believe there is a significant and growing body of evidence that identifies that Cowling Farm site is NOT available, suitable and achievable due to the factors summarised in section 6 of this representation. This view is based on careful consideration of the Chorley Local Plan 2012 – 26, Gypsy and Travellers and Travelling Showpeople Preferred Options, Statement of Consultation Supplement: Regulation 22, (1) (c) Report and other publically available Council documents. I believe that the publicly available documents and process that the Council has used for a vehicle for decision making are considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or ‘sound’ proposal and therefore the preferred option has to be considered unsound. Please see section 6 for specific issues.

2: Agree with preferred site?

No

3: Comments on document

There are some key assertions identified in attached and below that identify significant breaches in legal compliancy of the Chorley Council’s ‘Preferred Options Report’. Significant concerns in the consultation approach have been identified that put into question the Councils entire assessment and approach across all sites and comprehensively challenge both the “Legal Compliance” and the “Soundness” of the report ~ against all sub categories identified by the Council (Positively Prepared, Justified, Effective and consistent with National Policy)

I would also like to make it perfectly clear that all points raised in this representation are intended to be non-discriminatory. The issues identified do not challenge the spirit of creating a Gypsy and Traveller site; they do however aim to challenge how Chorley Council has considered its planning analysis and engagement regarding the location(s) of a site of this nature, and indeed any other key developments that impact its local settled communities.

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On this basis I propose the Cowling Farm site is rejected for incongruous reasons and would like to identify that the Council have consequently made the wrong choice in their preferred option. I would therefore request that the Inspector concludes that this entire element of the Chorley Local Plan (CLP) is UNSOUND.

4(1): Legally compliant?

No

4(2): Sound?

No

5(1): Not positively prepared?

✓

5(2): Not justified?

✓

5(3): Not effective?

✓

5(4): Not consistent with national policy?

✓

6: Reasons not legally compliant/unsound

I object to the Chorley Council proposal to use Cowling Farm as their preferred site for the Gypsy/Traveller community for the following reasons:
The report presented is factually incorrect and misleading.
- Improper use of taxpayers money and loss in value of existing land asset.
- Cause of significant traffic, road safety and health and safety issues.
- Unacceptable manipulation/annexing of Green Belt designated land for site access.
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‘preferred site’. I am aware that Councillors representing other sites in the Chorley area have mail dropped and informed local residents.

1.3.1.2.1. There is NO clear evidence that the Council’s consultation process has engaged with local employers in the area. Had the Council done so it would have collected clear evidence that employment in the Cowling area of Chorley will be compromised if the Council proceeds with its proposal for its development for Gypsies, Travellers and Travelling Show People. Local entrepreneurs have also mentioned that it would also call into question the success of any future business expansion adjacent to Moorland Gate Business Park.

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7: Necessary changes

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I welcome a revised schedule of deadlines and a corrected and improved engagement process/methodology that reflects best practice be published to enable robust decision making in an open, honest, fair, inclusive and transparent way.

8: Participate in examination?  No

9: Reason participation necessary

Councils response

Cowling Farm is the most expensive option, along with Harrison’s Farm, but it is considered the most suitable site and is available and achievable. The “cheapest” site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation document.

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The Council has considered brownfield sites as part of this process, but as stated
Cowling Farm is considered the most reasonable site when considered against the
alternatives (see analysis above - section 8 of Proposed Allocation document).
National planning policy in the Framework encourages the re-use of brownfield land,
but does not state that it should always be used before greenfield land.
The Council has progressed this proposed allocation in full accordance with its
Statement of Community Involvement. The volume of representations received
demonstrates how 'engaged' the local community has been in this work.

The Council’s Statement of Community Involvement sets out the approach to
consultation on planning policy documents. It does not require residents/businesses
that are in the vicinity of a proposed allocation to be consulted on an individual basis.
Such policy proposals are publicised by other means such as press releases, updates to
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The Localism Act also introduced a new right for communities to draw up a neighbourhood plan. Provided a neighbourhood development plan or order is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and with other legal requirements, local people will be able to vote on it in a referendum. If the plan is approved by a majority of those who vote, then the local authority will bring it into force.

The Preferred Options Consultation could not be put on hold as the Council endorsed the approach and documents at Full Council on 3 June 2014 for 6 weeks consultation. The Council is required to follow the Local Plan Inspector’s timetable and progress the Chorley Local Plan to adoption.
I object to the Chorley Council proposal to use Cowling Farm as their preferred site for the Gypsy/Traveller community for the following reasons:

- The report presented is factually incorrect and misleading.
- Improper use of taxpayers money and loss in value of existing land asset.
- Cause of significant traffic, road safety and health and safety issues.
- Unacceptable manipulation/annexing of Green Belt designated land for site access.
- Damage to the areas rural character - this will promote the ruination of the Chorley gateway to the West Pennine Moors.
- Unacceptable risk that Gypsies from across the North West expand the site/adjacent land to Dale Farm proportions.
- Destruction of development and employment opportunities on Moorland Gate Business Park.
- More appropriate sites can be found elsewhere for much less cost e.g. Hut Lane Travellers want Yarrow Bridge site and planning law suggests that brownfield site (i.e. Yarrow Bridge, Cabbage Hall Fields and Ackhurst Road) should always be used before greenfield.
- Failure by the Council to follow a transparent, fair and proper process e.g. breaching Localism Act 2011, total lack of consultation.
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- Loss of house sales.
- Lancashire County Council Highways concerns.
- Undulating topography of site.
- Detriment to Grade II listed building and adjacent property.

We require you to take note of all of the above and all the Cowling Action Group representations and petition and change this proposal.
Objections and concerns about report noted.

Cowling Farm is the most expensive option, along with Harrison’s Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation document.

The site is large enough for a range of uses. The land is allocated for a mix of housing and employment in the Chorley Local Plan 2012-2026 and it will remain a significant land asset. Land for the Gypsy and Traveller site will be discounted from the allocated areas. This is acceptable because the Inspector (Dr Bussey -18 January 2014) stated "In principle I consider that the re-allocation of some existing housing and/or employment sites for Gypsy and Traveller purposes would be acceptable. Although this may have implications in relation to the need for updated evidence, consultation and SA". The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing.

If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

- Community engagement between the settled and Traveller community.
- The masterplanning process.
- Highways options in relation to the delivery of the mixed use site.

As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are ‘not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt’. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application.
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The land is allocated for housing and employment therefore the principle of development is established. There are a number of planning policies that seek to protect landscape amenity and these will be complied with in any detailed planning application.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The Council considers that actual or perceived impact on businesses is not a material planning consideration.
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Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:
• The land is owned by the Council and is deliverable and developable
• A dedicated access is achievable
• The land is within the settlement of Chorley and accessible to services and facilities
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• The site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
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The Council considers that actual or perceived impact on businesses is not a material planning consideration including perceived detrimental economic impact on a public house.

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The Council has considered brownfield sites as part of this process, but as stated Cowling Farm is considered the most reasonable site when considered against the alternatives (see analysis above - section 8 of Proposed Allocation document). National planning policy in the Framework encourages the re-use of brownfield land, but does not state that it should always be used before greenfield land.

The Council has progressed this proposed allocation in full accordance with its Statement of Community Involvement. The volume of representations received demonstrates how 'engaged' the local community has been in this work. The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the
preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Council is committed to ensuring community cohesion and will continue to work with the local community including the ‘temporary’ and permanent Traveller community and relevant stakeholders such as the police authority in respect of design and layout and community cohesion issues. The playing fields at Limbrick are not part of the preferred site option at land at Cowling Farm.

The undulating topography of the site will be taken account of as part of the masterplanning process for the site. It is considered that some contouring will be required to facilitate the development of the Gypsy and Traveller pitches and the allocation as a whole.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:
• the contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
• the impact that the loss of the Cowling Farm site and its subsequent development might have upon the significance of the Farmhouse
• how any harm might be removed or reduced
• the impact that the loss of this site and its subsequent development might have upon the significance of Cowling Farmhouse with mitigation measures in place
The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.
Any development of this site needs to be sensitively designed so that it will have a positive impact on the setting of Cowling Farmhouse. Applications for the development of this site will be assessed against Policy 16 (Heritage Assets) in the Central Lancashire Core Strategy, BNE1 (Design Criteria for New Development) and BNE8 (Protection and Enhancement of Heritage Assets) in the Local Plan and policy on conserving and enhancing the historic environment in the National Planning Policy Framework. An application will need to demonstrate an understanding of the contribution of the site to the significance of Cowling Farmhouse, the impact of developing the site upon it, and specifically how the proposed development will impact upon its setting.
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The Council considers that actual or perceived impact on businesses is not a material planning consideration including perceived detrimental economic impact on a public house.

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The Council has considered brownfield sites as part of this process, but as stated Cowling Farm is considered the most reasonable site when considered against the alternatives (see analysis above - section 8 of Proposed Allocation document). National planning policy in the Framework encourages the re-use of brownfield land, but does not state that it should always be used before greenfield land.

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The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

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Title: P L Smith

Site/location: 1. Cowling Farm

Paragraph/section: Modification

1: Evidence why available/suitable/achievable?

2: Agree with preferred site?

3: Comments on document

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- Damage to the areas rural character - this will promote the ruination of the Chorley gateway to the West Pennine Moors.
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- Destruction of development and employment opportunities on Moorland Gate Business Park.
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- Undulating topography of site.
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Objections and concerns about report noted.

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The site is large enough for a range of uses. The land is allocated for a mix of housing and employment in the Chorley Local Plan 2012-2026 and it will remain a significant land asset. Land for the Gypsy and Traveller site will be discounted from the allocated areas. This is acceptable because the Inspector (Dr Bussey -18 January 2014) stated "In principle I consider that the re-allocation of some existing housing and/or employment sites for Gypsy and Traveller purposes would be acceptable. Although this may have implications in relation to the need for updated evidence, consultation and SA". The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

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The access to the proposed Gypsy and Traveller site has yet to be finalised.

Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document - LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The land is allocated for housing and employment therefore the principle of development is established. There are a number of planning policies that seek to protect landscape amenity and these will be complied with in any detailed planning application.
The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

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Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

- the land is owned by the Council and is deliverable and developable
- a dedicated access is achievable
- the land is within the settlement of Chorley and accessible to services and facilities
- it has the potential to meet the needs of the existing Traveller community at Hut Lane
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The undulating topography of the site will be taken account of as part of the masterplanning process for the site. It is considered that some contouring will be required to facilitate the development of the Gypsy and Traveller pitches and the allocation as a whole.

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• the contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
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The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

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Under Para 90 of the Framework, certain forms of development are ‘not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt’. These include ‘local transport infrastructure which can demonstrate a requirement for a Green Belt location.’ In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

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The undulating topography of the site will be taken account of as part of the masterplanning process for the site. It is considered that some contouring will be required to facilitate the development of the Gypsy and Traveller pitches and the allocation as a whole.

Any proposed development needs to minimise harm to the significance of the historic environment. The Cowling Farm site is located to the east of the existing curtilage to Cowling Farmhouse, which is a Grade II listed building. A heritage impact assessment has been undertaken which considers:

- the contribution that the Cowling Farm site makes to the significance of Cowling Farmhouse
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- how any harm might be removed or reduced
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The heritage impact assessment concludes that mitigation, by way of a development buffer zone and screen planting, will result in an acceptable relationship between development on the proposed site and the designated heritage asset such that the significance embodied therein will be sustained.

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- Improper use of taxpayers money and loss in value of existing land asset.
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I believe there is a significant and growing body of evidence that identifies that Cowling Farm site is NOT available, suitable and achievable due to the factors summarised in section 6 of this representation. This view is based on careful consideration of the Chorley Local Plan 2012 – 26, Gypsy and Travellers and Travelling Showpeople Preferred Options, Statement of Consultation Supplement: Regulation 22, (1) (c) Report and other publicly available Council documents. I believe that the publicly available documents and process that the Council has used for a vehicle for decision making are considerably deficient in their preparation and are therefore NOT deemed to represent a legally compliant or ‘sound’ proposal and therefore the preferred option has to be considered unsound. Please see section 6 for specific issues.

2: Agree with preferred site? No

3: Comments on document

There are some key assertions identified in attached and below that identify significant breaches in legal compliancy of the Chorley Council’s ‘Preferred Options Report’. Significant concerns in the consultation approach have been identified that put into question the Councils entire assessment and approach across all sites and comprehensively challenge both the “Legal Compliance” and the “Soundness” of the report ~ against all sub categories identified by the Council (Positively Prepared, Justified, Effective and consistent with National Policy)

I would also like to make it perfectly clear that all points raised in this representation are intended to be non-discriminatory. The issues identified do not challenge the spirit of creating a Gypsy and Traveller site; they do however aim to challenge how Chorley Council has considered its planning analysis and engagement regarding the location(s) of a site of this nature, and indeed any other key developments that impact its local settled communities.

My guiding principles are that any proposals for decision making should be considered in an open, honest, fair, inclusive and transparent way that appropriately recommends a suitable location(s). Any Council recommendation should be objective in its interest (not subjective); make the best use of tax-payers money, support the interest of the local community and thus offer a consistent, well informed and non-prejudiced recommendation.

On this basis I propose the Cowling Farm site is rejected for incongruous reasons and would like to identify that the Council have consequently made the wrong choice in their preferred option. I would therefore request that the Inspector concludes that this entire element of the Chorley Local Plan (CLP) is UNSOUND.

I object to the Chorley Council proposal to use Cowling Farm as their preferred site for the Gypsy/Traveller community for the following reasons:

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The preferred options document is completely flawed and unfit for purpose. It is full of
factual inaccuracies and misleading information. I am writing separately to list the many objections to the
document itself and findings. This is ill thought out and produced in a panic because
Chorley Council has backed itself into a corner by its own
incompetence, and now continues to behave in a likewise manner. This consultation is
a farce and is not in line with legal requirements under localism legislation. It will
create economic problems, social problems, road safety and health and safety issues.
The Council say the Hut lane encampment is inappropriate because of Green Belt
issues but then full of hypocrisy say it is OK to break through Green Belt themselves!!
Planning law says brownfield should be used first, so 3 of the other sites are far more
appropriate. Chorley are using a massive piece of land and could end up with Dale
Farm two!!

We require you to take note of all of the above and all the Cowling Action Group
representations and petition and change this proposal.

4(1): Legally compliant? No
4(2): Sound? No
5(1): Not positively prepared? ☑
5(2): Not justified? ☑
5(3): Not effective? ☑
5(4): Not consistent with national policy? ☑

The following points act as a high level précis to ‘set out’ and identify key points that
the publically available Council document(s) for consideration (and process) are
deemed considerably deficient in their preparation and are therefore NOT deemed to
represent a legally compliant or sound proposal.

It must first be noted that the format of this representation form is extremely difficult
for a ‘layman’ to complete in line with the aforementioned criteria. Subsequent
observations and assertions will try and highlight linkage to the Council’s framework
but there are a number of points that appear to cover a number of criteria.

1. In the Council forming its ‘preferred option’ / recommendation I believe the
   consultation process executed has been inadequate and is in Legal breach of the
   Localism Act 2011 which requires Councils to both notify and consult local settled
   communities in respect of this type of development before publishing its proposals
   (Supporting Evidence also Identified in Appendix 1).
1.1. The Localism Act 2011 became law on 15th November 2011 when it received
Royal assent; breaches of the Act are therefore illegal. As a member of the settled community I do not see any evidence that the Council has taken the Act into account in its decision to identify a preferred site.

1.2. Further the Council is in breach of the Neighbourhood Planning (General) Regulations 2012 which states that "......before submitting a plan proposal to the local planning authority, a qualifying body must........publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area”.

1.3. With above in mind, community engagement should provide an opportunity for everyone to contribute.

1.3.1. There is growing evidence that there are many residents within the ward who are still not aware of the Council’s proposals and thus feel discriminated against.

1.3.1.1. The Council has demonstrated significant failure to publicise in an open, transparent and inclusive manner with both its settled and Traveller communities. There has been a distinct lack of appropriate stakeholder notification and meaningful involvement. Despite a number of alleged previous ‘consultation’ periods large sections of the settled community were surprised to recently learn of a ‘preferred’ option having been determined. Particularly speaking as a local resident I was not aware that any options were being considered, and only recently (10th June) found out via word and mouth. I believe that a lack of engagement with interested parties renders the document inconsistent with the requirements of the NPPF.

1.3.1.2. Furthermore during this latest consultation period there have been examples of inconsistencies towards the Councils approach to advise residents across the community or local employers for other designated sites, but NO consideration has been made to advise or ‘mail drop’ the local settled community by the Council of its ‘preferred site’. I am aware that Councillors representing other sites in the Chorley area have mail dropped and informed local residents.

1.3.1.2.1. There is NO clear evidence that the Council’s consultation process has engaged with local employers in the area. Had the Council done so it would have collected clear evidence that employment in the Cowling area of Chorley will be compromised if the Council proceeds with its proposal for its development for Gypsies, Travellers and Travelling Show People. Local entrepreneurs have also mentioned that it would also call into question the success of any future business expansion adjacent to Moorland Gate Business Park.

1.3.2. The representation form is not user friendly and has been ill considered. There is NO formal statement that other forms of representation are welcomed. There is NO evidence that the Council have considered diversity and inclusion principles to engage with our multi-cultural and multi-linguistic community (no translation of the form has been offered) for anyone wishing to make representation in any other language. Equally the form is not in any way user friendly and thus technically unusable, particularly due to legal references that would scare most individuals from completing and submitting the form, and categorise their arguments. Even if this form was usable it would discriminate against those who do not have access or are not able to use computers.

1.3.3. This lack of inclusive consultation and the engagement period also precludes any real opportunity to mobilise a “Neighbourhood Plan” or “Neighbourhood Forum” in time for the 16th July timeframe. As a settled member of the community I believe it should be our legal right to achieve this before the closing period of a consultation ~ 6 weeks is simply not enough time.

7: Necessary changes

Based on all the publically available information as previously asserted in the last section of this document; the Council’s lack of community engagement; its continuing failure to publicise; its lack of stakeholder notification, its failure to embrace the Localism Act 2011 and the knock-on effect on any future neighbourhood planning are all part of a growing body of evidence that the local settled community has been discriminated against.
These are the most serious of issues and hence I would appreciate that the Council withdraw its Preferred Options Document. The Council should then carry out a thorough open and transparent review of all the points mentioned and all actions carried out in relation to the Preferred Options Document to demonstrate appropriate engagement and legality.

I welcome a revised schedule of deadlines and a corrected and improved engagement process/methodology that reflects best practice be published to enable robust decision making in an open, honest, fair, inclusive and transparent way.

8: Participate in examination?  No

9: Reason participation necessary

Councils response

Objections and concerns about report noted.
Cowling Farm is the most expensive option, along with Harrison's Farm, but it is considered the most suitable site and is available and achievable. The "cheapest" site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency. The detailed cost information has been updated - see Appendix 5 of the Proposed Allocation document.

The access to the proposed Gypsy and Traveller site has yet to be finalised. Lancashire County Council (LCC) Highways have provided an updated response (see Proposed Site Allocation document -LCC Highway comments pages 31 -32). They identify that there are three potential accesses to the site with access off Moorland Gate being the preferred access route from a highways perspective. Moorland Gate is an adopted public highway to the turning head end of the road and there is scope for the sort of improvements that they would wish to see to enable access between the site and local facilities on foot and by bus (for example a formal footway along the eastern side of the road). Current access made off the road by the businesses served off Moorland Gate would not be impeded by the projected use of the site, although there would be an inevitable loss of on-street parking at the junction should a new access be taken off Moorland Gate. Details of how the access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location.' In a case where access is required through the Green Belt, this would not affect the openness of the Green Belt and the site would be wholly situated within an area allocated for a mix of housing and employment use. However, in light of more detailed comments from LCC Highways it is not necessary to pursue this access and it will not be necessary to seek the agreement to release the covenants for the specific area of land at Cowling Farm. The Local Plan Inspector will need to be satisfied that an access can be achieved in principle only. Details of how this access will be designed, laid out and constructed will be submitted as part of any future planning application for an allocated site which is when more thorough highways assessments will be undertaken by Lancashire County Council.

The land is allocated for housing and employment; therefore the principle of development is established. There are a number of planning policies that seek to protect landscape amenity and these will be complied with in any detailed planning application.

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by
the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The Council considers that actual or perceived impact on businesses is not a material planning consideration including perceived detrimental economic impact on a public house.

Following consultation, further analysis of the merits of each site was undertaken. This analysis is included in section 8 of the Proposed Allocation document. The analysis and comparison looked at the information that was provided from residents and stakeholders, including statutory consultees, and reviewed the sustainability indicators for each site. It also assessed each site against Core Strategy Policies 1: Locating Growth and 8: Gypsy and Traveller and Travelling Showpeople Accommodation as well as specific criterion set out in Planning Policy for Traveller sites. It concluded that Cowling Farm is the Council’s proposed allocation and is a suitable, available, achievable and sustainable site which accords with national policy on Gypsy and Travellers and Core Strategy Policies 1 and 8. Cowling Farm is considered the most reasonable site when considered against the alternatives. This is because:

• the land is owned by the Council and is deliverable and developable
• a dedicated access is achievable
• the land is within the settlement of Chorley and accessible to services and facilities
• it has the potential to meet the needs of the existing Traveller community at Hut Lane
• the site has the potential to meet the criteria as set out in Planning Policy for Traveller Sites (PPTS)
• it is sustainable, scoring B and would be compliant with the Core Strategy key policies
• the land is allocated for housing and employment, therefore the principle of housing development is established.

Cowling Farm is considered the most reasonable site as part of this process, but as stated Cowling Farm is considered the most reasonable site when considered against the alternatives (see analysis above - section 8 of Proposed Allocation document). National planning policy in the Framework encourages the re-use of brownfield land, but does not state that it should always be used before greenfield land.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.
<table>
<thead>
<tr>
<th>Rep No</th>
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<td>GT305</td>
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I have to submit my opposition to any planned Gypsy site in this locality. This area is next to both a quiet housing community on Carr Lane and a clean river (Yarrow) and woodlands that is almost certainly going to be spoilt and contaminated in time by extended usage. The area is also frequently used as a walkers location by many aged people and this could deter them from frequenting this area in future. As for the proximity of the Yarrow Bridge Restaurant and Premier Inn, this Gypsy site would deter much needed business in future. Finally, for sure the housing in this areas will devalue significantly and I hope the Government and Council plan to compensate the people in this regard.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.
I wish to object most strongly about the possible use of the Yarrow Bridge depot as a permanent Gypsy and Traveller site. My objections are based on the following points:

According to the Chorley Local Plan 2012-2026 there is a need to provide a permanent Gypsy and Traveller site for at least 5 pitches within the Borough. If such an allocation is found it will allow the Chorley Local Plan to be progressed to adoption. This immediately provides the reason for the sudden need for a permanent site. The initial requirement is for 5 pitches but the size allocated and the stated minimum of 5+ shows that it is expected to have many more arriving at the site. How many does the Council expect to be using the site?

The proposed site is Green Belt land (although this does not seem to matter much these days) and the Travellers will be coming in and going out onto a busy arterial major road.

There is a bus stop to the entrance of the site that is used by lots of school children from Albany Academy on a daily basis. This would be a major safety hazard with traffic from the possible site.

On the Chorley Local Plan 2012-2026 under contamination it states that there are no known contamination issues. This site has been used over the years to dump various noxious substances including lots of asbestos some of which is buried up to 20 feet deep. Also buried on this site are fridge freezers containing CFC, street lamp posts, metal grids and other types of metal. The Environment Agency and United Utilities are probably not currently aware of this. In the past I had the site closed by the Environment Agency due to the types of waste found there. It was closed for approx. 2.5 years until illegally reopened by contractors on behalf of the Council.

If this site does become a permanent Gypsy and Traveller site I will be subjected to excessive noise and lights from the movement on and off the site at all hours and from generators, dogs etc. This is due to the possible site being at a higher elevation than my property. My property will become very expensive to insure and probably impossible to sell. Will I get any reimbursement from Chorley Council?

The plan has a section on Sustainability Appraisal. Most of the site performance indicators are not applicable as they will not be used by the site occupants.

Having spoken to local residents I have found that they are all alarmed by this possible site use in relation to decreased property values. I do not think that the residents of the nearby Premier Inn would like the noise and disturbance from such a site very close to them as they are attempting to sleep at night.

Has the Council got a policy on reduced rates (household or business) in the case of a Gypsy and Traveller site nearby?

With regard to the Yarrow Bridge depot I have no personal objection to its presence as...
long as it just remains a storage site and is not turned into anything else.

The history of the site has not been addressed. This was a site flat with the River Yarrow that forms a natural boundary to its northern edge. It was then raised to its current height by tipping and was a depository for household waste that was attractive to flies. During the post war years there were so many flies that it was often impossible to see the inside window ledges at 2 Springwood Cottages due to the bodies of flies that had got into the house and perished. After complaints, that included convincing a sceptical Council official of the severity of the problem by upending a bag of dead flies collected from just one window ledge on his desk, some anti-fly spraying measures were undertaken. It seems likely that the vegetable and meat matter that attracted the flies is decomposing into various gases including methane which may be a potential hazard to caravan dwellers who often use naked flames and whose vans could become filled with explosive gases leading to tragic results. Following the cessation of household waste tipping there was a period within the last decade when a wide range of materials, many ferrous such as old lamp standards, some toxic such as asbestos were dumped. This abuse of the land was finally stopped, not by the Council but by the Environment Agency who padlocked the gates following a complaint by Mr Albert Moss. Given this history it is difficult to see how this site can be as required under point 5.7 of the preferred options document - '...sustainable economically, socially and environmentally.' Placing caravans over this pre-history would expose the caravan occupants to dangers and also provide a difficult to refute case that the Travelling people had not been treated according to Government policy again under 5.7. A situation potentially exposing the Council to a serious risk of a class action suit for substantial damages. The risk of litigation would be made troublesome for the Council if the removal from the Green Belt proceeded. The potential implication being of specifically allocating only Travellers to a site such that only they could be exposed to any dangers directly from the site.

Additionally the removal of Green Belt status and the provision of a Traveller site would impact directly on the environment. Over the last few decades the cleaning of the Black Brook has led to a dramatic increase in both flora and fauna. It is now common to see many species that in my childhood were never seen. It has been transformed into a rich aquatic environment from one which was so heavily polluted that only very tolerant species such as blood worms lived. The cleaning has attracted many species to it and has filled the wooded area to the north of the proposed Travellers site with birds of which were once common. Grey Heron regularly fish in the rivers and Roe deer are regular visitors where they often have their calves. It would seem a serious dereliction of the Council environmental stewardship if they were to endanger this dramatic improvement in the areas natural diversity and create a potential trouble for the Yarrow Valley Country Park that has been one of the Council’s great environmental successes of the late 20th and early 21st centuries. A success that if allowed to continue will provide a diverse natural resource that can be enjoyed by the countless Chorley residents yet unborn.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? ☐
5(2): Not justified? ☐
5(3): Not effective? ☐
5(4): Not consistent with national policy? ☐
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?

9: Reason participation necessary

Councils response

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The site is a previously developed site in the Green Belt. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

Lancashire County Council Highways have considered relevant highways issues and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation.

The Preferred Options report states that there are no known contamination issues and a low likelihood of contamination, however further checks are needed to confirm this. The nature of contamination would be verified through ground investigation works that would be undertaken as part of any proposed allocation and appropriate mitigation measures undertaken.

Any application would have to satisfy Local Plan Policies BNE1: Design Criteria for New Development and BNE6 Light Pollution intended to protect general amenity.

The Council considers that actual or perceived impact on property values is not a material planning consideration.

National Planning Practice Guidance states “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.”

The SA scoring is not weighted as it is not considered that some indicators have more importance. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding allocations. A number of other factors such as deliverability need to be taken into consideration.

The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report.

Further analysis of the merits of each site has been undertaken. This has considered the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.

The environmental/ecological value of land is recognised under relevant planning policies and guidance and specifically under Local Plan 2012-26 Policy BNE5: redevelopment of Previously Development Sites in the Green Belt which states that any proposals on this site 'will not be of significant detriment to features of historical or ecological importance'.
I wish to object most strongly about the possible use of the Yarrow Bridge depot as a permanent Gypsy and Traveller site. My objections are based on the following points:

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The plan has a section on Sustainability Appraisal. Most of the site performance indicators are not applicable as they will not be used by the site occupants.

Having spoken to local residents I have found that they are all alarmed by this possible site use in relation to decreased property values. I do not think that the residents of the nearby Premier Inn would like the noise and disturbance from such as site very close to them as they are attempting to sleep at night.

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Additionally the removal of Green Belt status and the provision of a Traveller site would impact directly on the environment. Over the last few decades the cleaning of the Black Brook has led to a dramatic increase in both flora and fauna. It is now common to see many species that in my childhood were never seen. It has been transformed into a rich aquatic environment from one which was so heavily polluted that only very tolerant species such as blood worms lived. The cleaning has attracted many species to it and has filled the wooded area to the north of the proposed Travellers site with birds of which were once common. Grey Heron regularly fish in the rivers and Roe deer are regular visitors where they often have their calves. It would seem a serious dereliction of the Council environmental stewardship if they were to endanger this dramatic improvement in the areas natural diversity and create a potential trouble for the Yarrow Valley Country Park that has been one of the Council’s great environmental successes of the late 20th and early 21st centuries. A success that if allowed to continue will provide a diverse natural resource that can be enjoyed by the countless Chorley residents yet unborn.

4(1): Legally compliant?
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5(1): Not positively prepared? ☐
5(2): Not justified? ☐
5(3): Not effective? ☐
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6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?

9: Reason participation necessary

Councils response

The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

The site is a previously developed site in the Green Belt. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

Lancashire County Council Highways have considered relevant highways issues and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation.

The Preferred Options report states that there are no known contamination issues and a low likelihood of contamination, however further checks are needed to confirm this. The nature of contamination would be verified through ground investigation works that would be undertaken as part of any proposed allocation and appropriate mitigation measures undertaken.

Any application would have to satisfy Local Plan Policies BNE1: Design Criteria for New Development and BNE6 Light Pollution intended to protect general amenity.

The Council considers that actual or perceived impact on property values is not a material planning consideration.

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Further analysis of the merits of each site has been undertaken. This has considered the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.

The environmental/ecological value of land is recognised under relevant planning policies and guidance and specifically under Local Plan 2012-26 Policy BNE5: redevelopment of Previously Development Sites in the Green Belt which states that any proposals on this site 'will not be of significant detriment to features of historical or ecological importance.'
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The proposed site is Green Belt land (although this does not seem to matter much these days) and the Travellers will be coming in and going out onto a busy arterial major road.

There is a bus stop to the entrance of the site that is used by lots of school children from Albany Academy on a daily basis. This would be a major safety hazard with traffic from the possible site.

On the Chorley Local Plan 2012-2026 under contamination it states that there are no known contamination issues. This site has been used over the years to dump various noxious substances including lots of asbestos some of which is buried up to 20 feet deep. Also buried on this site are fridge freezers containing CFC, street lamp posts, metal grids and other types of metal. The Environment Agency and United Utilities are probably not currently aware of this. In the past I had the site closed by the Environment Agency due to the types of waste found there. It was closed for approx. 2.5 years until illegally reopened by contractors on behalf of the Council.

If this site does become a permanent Gypsy and Traveller site I will be subjected to excessive noise and lights from the movement on and off the site at all hours and from generators, dogs etc. This is due to the possible site being at a higher elevation than my property. My property will become very expensive to insure and probably impossible to sell. Will I get any reimbursement from Chorley Council?

The plan has a section on Sustainability Appraisal. Most of the site performance indicators are not applicable as they will not be used by the site occupants.

Having spoken to local residents I have found that they are all alarmed by this possible site use in relation to decreased property values. I do not think that the residents of the nearby Premier Inn would like the noise and disturbance from such as site very close to them as they are attempting to sleep at night.

Has the Council got a policy on reduced rates (household or business) in the case of a Gypsy and Traveller site nearby?

With regard to the Yarrow Bridge depot I have no personal objection to its presence as
long as it just remains a storage site and is not turned into anything else.

The history of the site has not been addressed. This was a site flat with the River Yarrow that forms a natural boundary to its northern edge. It was then raised to its current height by tipping and was a depository for household waste that was attractive to flies. During the post war years there were so many flies that it was often impossible to see the inside window ledges at 2 Springwood Cottages due to the bodies of flies that had got into the house and perished. After complaints, that included convincing a sceptical Council official of the severity of the problem by upending a bag of dead flies collected from just one window ledge on his desk, some anti-fly spraying measures were undertaken. It seems likely that the vegetable and meat matter that attracted the flies is decomposing into various gases including methane which may be a potential hazard to caravan dwellers who often use naked flames and whose vans could become filled with explosive gases leading to tragic results. Following the cessation of household waste tipping there was a period within the last decade when a wide range of materials, many ferrous such as old lamp standards, some toxic such as asbestos were dumped. This abuse of the land was finally stopped, not by the Council but by the Environment Agency who padlocked the gates following a complaint by Mr Albert Moss. Given this history it is difficult to see how this site can be as required under point 5.7 of the preferred options document - ‘...sustainable economically, socially and environmentally.’ Placing caravans over this pre-history would expose the caravan occupants to dangers and also provide a difficult to refute case that the Travelling people had not been treated according to Government policy again under 5.7. A situation potentially exposing the Council to a serious risk of a class action suit for substantial damages. The risk of litigation would be made troublesome for the Council if the removal from the Green Belt proceeded. The potential implication being of specifically allocating only Travellers to a site such that only they could be exposed to any dangers directly from the site.

Additionally the removal of Green Belt status and the provision of a Traveller site would impact directly on the environment. Over the last few decades the cleaning of the Black Brook has led to a dramatic increase in both flora and fauna. It is now common to see many species that in my childhood were never seen. It has been transformed into a rich aquatic environment from one which was so heavily polluted that only very tolerant species such as blood worms lived. The cleaning has attracted many species to it and has filled the wooded area to the north of the proposed Travellers site with birds of which were once common. Grey Heron regularly fish in the rivers and Roe deer are regular visitors where they often have their calves. It would seem a serious dereliction of the Council environmental stewardship if they were to endanger this dramatic improvement in the areas natural diversity and create a potential trouble for the Yarrow Valley Country Park that has been one of the Council’s great environmental successes of the late 20th and early 21st centuries. A success that if allowed to continue will provide a diverse natural resource that can be enjoyed by the countless Chorley residents yet unborn.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared?
5(2): Not justified?
5(3): Not effective?
5(4): Not consistent with national policy?
6: Reasons not legally compliant/unsound
7: Necessary changes
The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan.

Lancashire County Council Highways have considered relevant highways issues and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation.

The Preferred Options report states that there are no known contamination issues and a low likelihood of contamination, however further checks are needed to confirm this. The nature of contamination would be verified through ground investigation works that would be undertaken as part of any proposed allocation and appropriate mitigation measures undertaken.

Any application would have to satisfy Local Plan Policies BNE1: Design Criteria for New Development and BNE6 Light Pollution intended to protect general amenity.

The Council considers that actual or perceived impact on property values is not a material planning consideration.

National Planning Practice Guidance states “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.”

The SA scoring is not weighted as it is not considered that some indicators have more importance. The purpose of the SA is to give a general overview of the sustainability of sites to be able to compare their sustainability, but it is not the only factor taken into consideration when deciding allocations. A number of other factors such as deliverability need to be taken into consideration.

The Council considers that the methodology for Sustainability Appraisal/Assessment has already been considered by the Inspector, and has been found sound in her partial report.

Further analysis of the merits of each site has been undertaken (see section 8 of the Proposed Allocation document). This has considered the information provided from residents and stakeholders, including consultees and has reviewed the Sustainability Indicators for each site. Where considered necessary the actual premises measured to are included.

The environmental/ecological value of land is recognised under relevant planning policies and guidance and specifically under Local Plan 2012-26 Policy BNE5: redevelopment of Previously Development Sites in the Green Belt which states that any proposals on this site 'will not be of significant detriment to features of historical or ecological importance'.

The site is a previously developed site in the Green Belt. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
I am a resident on Carr Lane in close proximity to the A6 Bolton Road. I have recently received your news sheet regarding the above and I am now contacting you to object in the strongest possible terms to the above consideration. I wish to put forward the following observations to be considered in support of my objection.

1. Local residents in recent times have seen mass residential development on the old United Utilities land between Carr Lane and Myles Standish Way. The impact of this development has seen a massive impact on the local landscape and outlooks previously enjoyed by long term residents.

2. Personally I have seen a significant increase in crime in the local area, both myself and several neighbours have been victims of crime since the new development commenced.

3. As a full time employee I have seen a significant increase in vehicular traffic on what was previously a very busy trunk road (A6) which has manifested in a significant rise in my commuting time to and from work.

4. There have been a disproportionate number of fatal and serious road traffic collisions on this particular stretch of road, which is borne out by regular deployments of the 'Camera Partnership' mobile speed detection van very close to the proposed site for consideration.

As a responsible Council I would implore you to disregard this site from your considerations, based not only on the massively negative impact on the local landscape, the increased saturation of residency on what was once an immensely desirable and quiet suburb of South Chorley, but most importantly for the health and safety considerations of local residents and the road users of this busy stretch of road.
guidance and specifically under Local Plan 2012-26 Policy BNE5: redevelopment of Previously Development Sites in the Green Belt which states that any proposals on this site 'will not be of significant detriment to features of historical or ecological importance'

Protection of views is not a planning policy consideration.
As with any proposed development, and in accordance with Local Plan 2012-26 Policy BNE1: Design Criteria for New Development, the Council will work with the police architectural liaison officer in order to secure measures that help to prevent crime and promote community safety as part of any planning permission.

Lancashire County Council Highways have considered relevant highways issues and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation.

The site is a previously developed site in the Green Belt. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
I wonder if you are aware of the shortage of Catholic school primary places in this area. It has been in the Chorley Guardian but in a nutshell St Gregory’s was oversubscribed by 60 plus pupils, many of these christened Catholic who have then struggled to find Catholic education within the Diocese. This of course has had a knock on effect with all the other primary schools in the area. The area of Weldbank, Eaves Green and Myles Standish Way has had considerable building over the last few years and it has resulted in this shortage. It is for this reason that I must object to the site. If you require further information about the school places I’m sure the school will help you.

Lancashire County Council Education Department contributed to the process of Local Plan allocation for housing and did not raise any such issues. The existing Traveller community children already avail of school places in Chorley Borough. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
I do not consider planning for the depot due to it being on an ex tip. You will also be increasing the road traffic onto Bolton Road, which is dangerous at the best of times. What planning do you consider in the care of this end of the Yarrow Valley Country Park? You have spent considerable money on there.

The Preferred Options report states that there are no known contamination issues and a low likelihood of contamination however further checks are needed to confirm this. The Council has noted a number of representations citing this land as a previous tip. The nature of contamination would be verified through ground investigation works that would be undertaken as part of any proposed allocation and appropriate mitigation measures undertaken.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

The landscape value of land is recognised under relevant planning policies and guidance and specifically under Local Plan 2012-26 Policy BNE5: redevelopment of Previously Development Sites in the Green Belt which states that any proposals on this site 'will not be of significant detriment to features of historical or ecological importance'.

The site is a previously developed site in the Green Belt. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
I wish to register my objection to the potential use of the Depot at Yarrow Bridge for the planned Gypsy/Traveller site. My objection is on the following basis:-

Additional traffic/highway safety:
The proposed site is located on Bolton Road/A6 and is already very busy at peak times, particularly since the addition of the new bypass (Miles Standish Way). It is often very difficult to exit our road onto the A6 at peak times and the addition of a Traveller site will only make a bad situation worse. The need to manoeuvre large caravans/trailers to/from the site would cause chaos on such a major highway and I would be extremely concerned about the safety risks caused by backed up traffic with 2 schools very close by (Albany & St George’s).

Noise & disturbance:
We already suffer from noise and disturbance caused by the nearby pub and Yarrow Bridge Garage, but both businesses are long established and we accept it as part of life. The addition of a Traveller site will create further noise and disturbance for the residents of Springwood Drive which is unacceptable.

Environmental:
I would expect that the site would need considerable development before being ready for occupancy and would be greatly concerned about the potential for the removal of trees and hedgerows, and other environmental impacts in what is Green Belt land. I understood that the location of such sites in Green Belt land is not allowed anyway?

I trust my comments above will be fully considered during the planning process.
mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

Noise & disturbance: Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria g) seeks to ensure that any new development will not cause ‘an unacceptable degree of noise disturbance to surrounding land uses’.

Environmental: Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria f) protects important natural habitats and landscape features such as mature trees and hedgerows. Policy BNE9: - Trees also protects trees.

Yarrow Bridge is a previously developed site in the Green Belt. Government guidance states that Traveller sites in the Green Belt are inappropriate development unless very special circumstances can be demonstrated. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
In my opinion a number of points make the site at Yarrow Bridge unsuitable:

- The access to the depot is directly off the main A6 Bolton Road.
- Bolton Road is always busy. The access is between two sets of traffic lights, which makes that section of the road permanently busy with traffic. Access from existing properties is already difficult.
- The speed limit on that section of the road is 40mph.
- During term time parking on the A6 by parents dropping and collecting their children from Albany Academy worsens the congestion and adds additional pressure to the traffic, which is already extremely high in that area.
- Visibility at the entrance to the site is inhibited by the proximity of a bus stop and its lay-by (into which the access road debouches) I suspect that, should a caravan or, indeed, any vehicle intend to turn into the site - from either direction - while a bus is loading or dropping passengers, it would have to wait on Bolton Road, thus blocking the carriageway and bringing the heavy traffic on Bolton Road to a complete standstill.
- I believe that there is a risk (albeit a small one) of flooding due to its location between the canal and the River Yarrow.
- I believe that the site would lie within the Green Belt; I do not think that this is permissible.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

The Environment Agency has confirmed the site boundary of Yarrow Bridge is not located in Flood Zone 2 (medium probability of flooding), although the access road to the site from Bolton Road (A6) would be. Therefore the Environment Agency advise
that no vulnerable part of the development, which in this case would be caravans, should be located in Flood Zone 2. Provided that this is adhered to, the Environment Agency are satisfied that the intended use of the site would not be an unacceptable level of flood risk.

Yarrow Bridge is a previously developed site in the Green Belt. Government guidance states that Traveller sites in the Green Belt are inappropriate development unless very special circumstances can be demonstrated. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
I wish object about the possible use of the former depot at Yarrow Bridge being used as Gypsy and Traveller site.

The site is off a very busy road, that has had several serious accidents, any additional junctions would only make this worse.

A very busy bus stop is at the access to this land that is used by school children. There is no other suitable location for the bus stop I understand that the site is full of contaminated land unsuitable for a residential area.

The site would increase traffic in the area, Chorley have been trying to reduce traffic in the area, hence the construction of the by pass.

Trees would need to be removed to create the site.

The site would be visually unpleasing.

I would be looking for compensation if the site was allowed for increase in home insurance, loss of value to my property etc.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
The Preferred Options report states that there are no known contamination issues and a low likelihood of contamination however further checks are needed to confirm this. The Council has noted a number of representations citing this land as a previous tip. The nature of contamination would be verified through ground investigation works that would be undertaken as part of any proposed allocation and appropriate mitigation measures undertaken.

Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria g) seeks to ensure that any new development will not cause 'an unacceptable degree of noise disturbance to surrounding land uses'.

Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria f) protects important natural habitats and landscape features such as mature trees and hedgerows. Policy BNE9: - Trees also protects trees.

Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development seeks to ensure against 'visually unpleasing' development.

The Council considers that actual or perceived impact on property values is not a material planning consideration.
I am concerned that what is an attractive wooded southern arterial access giving visitors to Chorley a good impression on entering the town may be compromised. The site has many trees and the attractive wooded appearance around the historical Yarrow bridge would be diminished. The Council is commendably attempting to raise the profile of the southern part of Chorley with the construction of the new Asda etc. I am aware that the former highways depot at the Yarrows has not been used for a considerable number of years and at some point the Council will have to find a use for it. Could it not be sold for housing development and the proceeds used if necessary to buy land for the Gypsy site on a less landscape sensitive, more brownfield site?

Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria f) protects important natural habitats and landscape features such as mature trees and hedgerows. Policy BNE9: - Trees also protects trees. Yarrow Bridge is a previously developed site in the Green Belt. Government guidance states that Traveller sites in the Green Belt are inappropriate development unless very special circumstances can be demonstrated. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
I consider that the former Depot at Yarrow Bridge for a permanent Gypsy and Traveller site is unsuitable for the following reasons:

1. Present access and egress to the site over the footway would be inadequate for the A6.
2. Even with improved access, it is via a bus layby crossing a cycle lane close to other vehicular accesses and approaching traffic lights.
3. Vehicles towing caravans need a lot of road space to manoeuvre on a main road even with improved access.
4. Buses arrive in the layby every 10 minutes in the day and there would be considerable safety issues.
5. Chorley has spent money on improving the old boundary stones and the image of access routes to the Borough. On leaving the town by double decker bus the last view would be a stop at this site. If kept properly this may not be a problem to the town's image but this is an unknown.

Lancashire County Council Highways have considered relevant highways issues and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. They have also stated that suitable local safety improvements would be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists.

There are a range of planning policies intended to protect amenity and landscape. Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development (criteria f) protects important natural habitats and landscape features such as mature trees and hedgerows. Policy BNE9: - Trees also protects trees. Any planning application for development of this site would have to conform to these policies. More specifically, local plan Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt seeks to ensure that there would not be a materially greater impact on
the openness of the Green Belt and the purposes of including land in it and that any
development respects the character of the landscape and has regard to the need to
integrate the development with its surroundings.
Yarrow Bridge has been considered and discounted because it falls within the Green
Belt and there are no 'exceptional' circumstances which would warrant its allocation
as the Council has identified other potential sites that do not fall within the Green Belt.
We have been instructed by The Spirit Pub Company and Whitbread Premier Inn to make representations strongly opposing the development of the site on Bolton Road, Yarrow Bridge Depot, Chorley for a Gypsy & Traveller site. The Spirit Pub Company and Whitbread Premier Inn are strongly opposed to the proposed development on a number of principal grounds.

FULL LETTER ON FILE

Conclusion:
We wish to vigorously oppose the Council’s proposal to consider the area of land identified as Yarrow Bridge Depot as a potential site for Gypsies & Travellers.

The Council in suggesting this site, appears to have disregarded Government policy on development in the Green Belt, which is outlined in the National Planning Policy Framework and which emphasises the importance which Government attaches to the Green Belt.

Furthermore the Council has chosen to ignore Government’s recent Planning Policy for Traveller Sites’ which was published in March 2012 and which states at paragraph 14 that “Traveller sites (temporary or permanent) in the GB are inappropriate development”.

Therefore, there is clear and unambiguous Government policy which states that the Council’s proposal for the Gypsies & Travellers site is wholly contrary to policy.

In addition to clear Government policy which affords protection for the Green Belt, the development of a Gypsy and Traveller site in this location would cause detriment to the existing road network, visual amenity and surrounding businesses.

For the reasons outlined above, we therefore consider that the Council has no planning reason to consider pursuing the development of a Gypsies & Travellers site on Yarrow Bridge Depot, Bolton Road, Chorley and we oppose the proposal.

We trust that our comments will be taken account of as the consideration of this application progresses.

4(1): Legally compliant? ☐
4(2): Sound? ☐
5(1): Not positively prepared? ☐
5(2): Not justified? ☐
5(3): Not effective? ☐
5(4): Not consistent with national policy? ☐
6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response

Yarrow Bridge is a previously developed site in the Green Belt. Government guidance states that Traveller sites in the Green Belt are inappropriate development unless very special circumstances can be demonstrated. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
2. Yarrow Bridge

This would be an unsuitable site for development of any sort due to its location. It's access point lies between a busy traffic junction, two schools and an accident black spot. The traffic at this point is very heavy and the flow has been made worse by the traffic lights at the junction of Bolton Road and Miles Standish Way. The development of housing on Miles Standish Way is adding and will continue to add to the traffic load at this point.

In the morning and mid-afternoon children are crossing Bolton Road at many points and the school traffic parking is a major problem. The number of accidents, many fatal, on this stretch of road is already shocking. The police recognise this and frequently post speed control cameras between Albany High School and Wigan Lane. Any further development of this area would be insupportable.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
I write in connection with the above proposed site. I know the site well and I wish to object strongly to this development in this location. The proposed siting of this development is particularly ill-considered in my opinion for the following reasons:

1. The proposed site will be right at the entrance to Chorley as you come in from Adlington which is currently well maintained and attractive. If this site is agreed it will become an eyesore.

2. Myself and my family along with lots of other members of the local community currently enjoy walking alone on and around the canal network and in Duxbury Park area.

3. Local schools will suffer if they are required to take in Traveller children for short spells as this will disrupt continuity.

4. I feel that Duxbury and Yarrow Valley has already had its fair share of interference with the introduction of the Miles Standish Way and Duxbury Manor estate.

5. I do not believe that this area has a major problem with unauthorised encampments, therefore I do not see the rationale for introducing a site here.

6. Yarrow Bridge and Duxbury Park are renowned for their history and community spirit where people take pride in their surroundings and the introduction of a Travellers site will have a negative effect on peoples attitude towards the area.

7. I do not understand the rationale for having a permanent site for Travellers. We travel and we use campsites which we pay for, I do not understand why Travellers do not appear to want to travel and use campsites which are already in situ one of which is around the corner from the proposed site.

Please let me know if a public meeting is to be held relating to this matter as many of the local residents including myself will argue vociferously against this proposal.
8: Participate in examination?

9: Reason participation necessary

Councils response

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. A permanent site would be designed and laid out to accommodate all of the Traveller needs within the site itself.

The Council will work with key stakeholders, including the local residences and businesses, the Travelling community and the police architectural liaison officer, an appropriate access, location, design and layout could be arrived at. This process would contribute to a ‘cohesive’ community.

Lancashire County Council Education Department contributed to the process of allocation for housing and did not raise any such issues. The existing Traveller community children already avail of school places in Chorley Borough.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.
We would very much like to strenuously object to a Gypsy camp on this site. Would we end up with horses on our lovely green in front of our houses on Woodside? Or behind us in Duxbury Park?

Everyone on the estate is dead against it.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. A permanent site would be designed and laid out to accommodate all of the Traveller needs within the site itself.
Whilst the red-edged boundary in the above document shows that Site 2: Yarrow Bridge Depot, Chorley, is not located in Flood Zone 2 (medium probability of flooding), the access road to the site from Bolton Road (A6) would be. Therefore, we would advise that no vulnerable part of the development, which in this case would be caravans, should be located in Flood Zone 2. Provided that this is adhered to, we are satisfied that the intended use for this site, if selected, would not be at an unacceptable level of flood risk.

Comments noted. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
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<td>Title:</td>
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<td>We would like to inform you that we do not have any direct objection to the proposed site at Yarrow Bridge, only that the numbers occupying the site are strictly controlled and monitored, and that if in the future the site becomes problematic in some way, that the Council acts on our complaints/concerns immediately.</td>
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<td>9: Reason participation necessary</td>
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<td>Councils response</td>
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<td>If it were to come forward, occupiers would be required to conform with the details as set out in the planning permission. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.</td>
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I have been trying to download the Representation Form to provide my views but have been unable to do so. I would like to register my objections to the proposed site at the former depot off the A6 near to the Yarrow Bridge pub.

If it were to go ahead on this relatively small site, the proposed use of the site to accommodate 15m and 25m long mobile homes and caravans will exacerbate the traffic queues on the A6 Bolton Road. This will lead to longer queues and delays at peak times and possibly to an increased likelihood of road traffic accidents and possibly involving children from St George's Primary School or the Albany Academy. As a resident of Hogg’s Lane, I already experience difficulties getting in and out of Hogg’s Lane at various times, this proposal would simply make that worse.

Additionally, I understand that this site is within Green Belt land and as such should be prevented from further development. Surely, this land could be better developed with proposals more in keeping with a sustainable and green environment, there are so many counter developments these days.

Finally, I fail to see why this site, out of all 9 sites should be selected, it is clearly not the most suitable site taking into account all of the criteria listed in your guidelines.

I shall be contacting my local MP and all of the neighbours to also write in with their objections to using this site for the Traveller and Gypsy compound.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no ‘exceptional’ circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to
mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
This site would not be suitable mainly due to the huge impact on traffic flow on the A6. This road is one of the main arterial routes in and out of Chorley and constantly congested with delays during rush hour. There have been several accidents on this road and a recent fatality with no means of crossing for pedestrians apart from at the main junctions. To consider adding to this traffic flow would be ludicrous.

As stated in the document this proposed area is within a Green Belt site. The local area has already been subject to development with the addition of the 'ring road' which has impacted on Duxbury Park and recently the building of houses on Duxbury Manor. The site is close to the river, canal, Duxbury Golf Course, a huge area which has been popular with walkers for many years. It would be criminal to develop the area further when there are so many other Brownfield sites which would be more suitable.

It states in the report the preferred secondary school is Southlands which again would mean increasing the traffic with the children having to be driven to school rather than being within walking distance. It would be difficult to negotiate turning right out of this site during rush hour.

The development of this site would have a negative impact on the area and I would urge you to reconsider putting this proposal forward for approval.

Lancashire County Council Highways have considered relevant highways issues and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

Planning policies are in place which would seek to mitigate against any potential negative impacts on the area should this site come forward for development. Central
Lancashire Core Strategy Policy 29: Water Management seeks to improve water quality, water management and reduce the risk of flooding. Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development (criteria f) protects important natural habitats and landscape features such as mature trees and hedgerows. Policy BNE9: - Trees also protects trees. Any planning application for development of this site would have to conform to these policies.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
We would like to submit our objections for the proposed Gypsy and Traveller site, being set up at the former Depot at Yarrow Bridge. This is a well established area with two very good schools, and lots of young families and elderly people who have lived in this area all their lives.

Also the entrance to this site is on a very busy road, and not suitable for wagons and vans used by Travellers especially at school finishing times.

As a Council tax payer I am not happy to think that my money is being used for a Gypsy site. If the Council want to give away free land, then give it to our children to build a future. This site would be an eyesore in such a lovely area with Duxbury Park being just across the road. What would be the prospects of selling your house to someone with this development on your doorstep. This wouldn't be a good advert for such a lovely town as Chorley and I hope you will think again about the proposals.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.
Firstly I would like to comment on the short notice of 2 days given to residents on the Duxbury estate. There are still a lot of elderly residents on the estate that do not know how to use the internet and email. The short time period has left them insufficient time for them to prepare their comments.

My own comments are as follows:
Placing a Gypsy site on the main artery into Chorley (the A6) - the site would be highly visible to visitors to the town and may impact the business for the premier inn, the nearby campsite and the yarrow bridge pub.

The area is densely populated and so there would also be the impact on the house prices in the surrounding estates.

The site is also closely sited to Duxbury park, the Chorley circular walking route and a school.

Chorley is currently receiving a lot of interest from businesses wanting to move to the north. It is well connected to the motorway network and it is currently facing a bright future.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups
received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

The comments imply that Chorley’s ‘bright future’ may be affected by such an allocation. The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.
<table>
<thead>
<tr>
<th>Site/location</th>
<th>2. Yarrow Bridge</th>
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**Paragraph/section**

**Modification**

1: Evidence why available/suitable/achievable?

2: Agree with preferred site?

3: Comments on document

I would like to put forward my objections for the above proposed site for various reasons outlined below.

The site selection process: The plan has not been probably exposed to all affected people, schools and local businesses. I live in the estate near Albany high school and my children go to the local primary school (St Georges) and feel I should have been informed of this by the Council planning office rather than word of mouth. I feel the plans should be over exposed rather than it is being kept quiet to get the plans passed.

Adequate Educational Provision: The local schools in the area are oversubscribed and have had excessive issues regarding children not being able to gain a place in the schools. Therefore, there is not the adequate space in these nearby schools to accommodate Traveller children.

Over development: Too many housing estates have been built in this area in the last few years and thus the area has seen a gross over development. This has led to schools being oversubscribed, increase in traffic and noise. The over development has adverse impact on the character and appearance of the area.

Road Safety: The A6 is a busy duel carriageway, very dangerous for pedestrians to cross and will increase the risk of road accidents and fatalities. There is a bus route which stops here and is will be affected.

Proximity to green areas and main rd.: The site would be seen from the main road and is near to Duxbury Park/woods which is currently having a large amount of money spent on it. The site will detract people from visiting the newly developed woods and as seen by all traffic and people passing through the area, I feel this inappropriate development will negatively impact on views of this area.

Businesses: An introduction of a Traveller site will have a direct impact on local business such as the Yarrow Bridge pub and hotel. The site will detract people from visiting or staying at such businesses and thus will have a negative impact on the success of the business.

I would therefore like this site removed from the plan and be excluded from any future plans for such developments.

| 4(1): Legally compliant? | ✗ |
| 4(2): Sound? | ✗ |
| 5(1): Not positively prepared? | ✗ |
| 5(2): Not justified? | ✗ |
| 5(3): Not effective? | ✗ |
| 5(4): Not consistent with national policy? | ✗ |
Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The character and appearance of an area is protected under national policy guidance and Local Plan policies such as BNE1: Design Criteria for New Development and Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt which requires development to respect the character of the landscape and have regard to the need to integrate the development with its surroundings.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

Lancashire County Council Education Department contributed to the process of additional school places in Chorley and did not raise any such issues. The existing Traveller community children already avail of school places in Chorley Borough. The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.
I have just been handed the "News from Local Labour Councillors" notice recently delivered on Woodside, Duxbury. Cannot understand why only Woodside received this notification when it affects all of Duxbury. Also you have given almost no time in which to respond as the deadline is 16th July (tomorrow).

One of the potential sites which has been identified is the former depot at Yarrow Bridge, Bolton Road, Chorley. Surely the Council should recognise this as a highly dangerous place for access as in this year alone several accidents have occurred, one of which was fatal. It is a dangerous junction with school children crossing. I believe this site would be unacceptable as too risky for the safety of our children. From a personal point of view I believe it would not only reduce the value of our properties, they would be difficult to sell should we wish to move away from the problems this would create.

I wish there was more time in which to respond but I now want to take this notice (only handed to me at 12.30 p.m. today 15th) to two or three neighbours who may also wish to register their comments.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred
Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.
I feel that since the opening of Myles Standish Way that the amount of traffic on the A6 has increased considerably which now leads to a back up of traffic both in the morning and also during early evening, I feel that the access to the A6 is restrictive considering where the bus stop is currently situated and feel further traffic which is still to come from the Arley Homes development plus if United Utilities sell the land for development is making this once free flowing road subject to more traffic and increased noise pollution and an accident waiting to happen. The access from the proposed site to the A6 is in adequate and represents a danger to both motorists and pedestrians.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
I am writing to object to the Former Depot at Yarrow Bridge, Bolton Rd, Chorley being listed as a potential permanent location for a Gypsy and Traveller Site. As a resident on Duxbury Estate we have already seen a substantial increase in the volume of Traffic on the A6, as a result of the construction of Miles Standish Way and the large housing development adjacent to it. Access to this potential site would involve creating another junction onto this busy stretch of the A6 Main Rd and cause further traffic problems. Also this site is in the Green Belt and should remain that way. I Trust you will note my comments.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
We are wanting to object to the proposed site next to Yarrow Bridge Hotel for a permanent Gypsy site. Not only has the A6 tripled with traffic in the 4 years we have lived here, we have had a new major road i.e. Myles Standish Way. How can you therefore build a new site which will exit onto the A6? Furthermore will they be tethering their horses on our green on Woodside and in Duxbury Park? We hope these things have been thought through.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

A permanent site would be designed and laid out to accommodate the Traveller needs such as those relating to horses within the site itself.
### Title:
Mrs Parkinson

### First Name:
M

### Last Name:
Parkinson

### Organisation:

#### Site/location
2. Yarrow Bridge

#### Paragraph/section

1: Evidence why available/suitable/achievable?

2: Agree with preferred site?

3: Comments on document
I wish to register my objection to your possible plans for the Gypsy site at Yarrow Bridge. I live on my own and for the Gypsies to come not far away I think this would be a worry.

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared? □

5(2): Not justified? □

5(3): Not effective? □

5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

#### Councils response
Objection noted. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
I am writing in objection to this proposal. I am highly concerned at the potential use of this area as a Travellers site. The site presents a multitude of problems for the proposed use which I shall outline below.

Firstly there is the issue of protection to the ancient woodland belt that the proposed site would be encroaching into. The Council has a responsibility to protect the woodland as outlined in the NPPF. Paragraph 118 states 'planning permission should be refused for development resulting in loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.' As this area is one of 9 proposed sites, clearly the need for the Travellers site to be located here is not paramount and does not warrant the destruction of the ancient woodland under the NPPF. There is also no benefit to the area of such a site being created due to the increased risk to the security of isolated properties to which there are many in the area, and a worry of antisocial behaviour from potential residents.

Another environmental issue is the proximity of the River Yarrow which wraps around the northern and eastern borders of the site. Having recently been re-established as an area inhabited by otters and Kingfishers due to the efforts of locals and the creation of a salmon leap by the A6, the river has dropped its moniker of an open sewer and has been cleaned up significantly. A Travellers site would prove to be a pollution risk to the river. This would be in contravention of Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000, which outlines the protection of European waterways under Art 1 which 'establishes a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater which prevents further deterioration and protects and enhances the status of aquatic ecosystems.'

Whilst dealing with the issue of the River Yarrow I also wish to express concerns regarding the flood risk to the above site. The river acts as an overflow for both the nearby Leeds Liverpool canal and the upper Rivington reservoir. As a result during periods of rainfall, especially in winter months, the river often swells to many times its normal size and has resulted in dangerous flooding of the properties on the opposite side of the river from the proposed site. This issue has been raised by the Council themselves in previous planning applications for the Yarrow Bridge Garage, where the area is designated a flood zone. My concern is that the garage in question is a permanent structure, further away from the river than the depot is. The risk of being closer to the river and the nature of Travellers accommodation being at much greater risk to flood waters I believe it would either be prohibitively costly or impossible to protect mobile homes and caravans from flood waters to the level required by the Flood Risk Standing Advice (FRSA).

Another concern is that of the increased congestion on the A6 which is already a busy thoroughfare and commuting route into the centre of Chorley. The site proposal is for five plots minimum, each plot will add around 9 to 11 traffic movements to the A6,
which as noted above is already a busy road. Compounding this is the proximity of the site entrance to the intersection of Bolton Road and Miles Standish Way. The site entrance would clearly need to be to the A6, due to lack of other options, and as such would be a danger to road traffic safety.

If this application is to be decided by Councillors please take notice that I would like to speak at the meeting of the committee at which this application is expected to be decided. Please let us know as soon as possible the date of the meeting.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? ☐
5(2): Not justified? ☐
5(3): Not effective? ☐
5(4): Not consistent with national policy? ☐
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

There is no planning application for the Yarrow Bridge site. This site is one of 9 assessed as options for a permanent Gypsy and Traveller site in the borough. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no ‘exceptional’ circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Advice in relation to flooding and water issues has been provided by the Environment Agency and United Utilities and this has contributed to detailed site assessments.

United Utilities have stated "Foul and surface water pipes run through the site, a water main is located nearby. Therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree this when/if necessary. The location of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure". The Environment Agency have stated "Whilst the red-edged boundary in the above document shows that Site 2: Yarrow Bridge Depot, Chorley, is not located in Flood Zone 2 (medium probability of flooding), the access road to the site from Bolton Road (A6) would be. Therefore, we would advise that no vulnerable part of the development, which in this case would be caravans, should be located in Flood Zone 2. Provided that this is adhered to, we are satisfied that the intended use for this site, if selected, would not be at an unacceptable level of flood risk.

Central Lancashire Core Strategy Policy 29: Water management seeks to improve water quality, water management and reduce the risk of flooding. Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria f) protects important natural habitats and landscape features such as mature trees and hedgerows. Policy BNE9: - Trees also protects trees. Spring Woods is an ancient woodland but the ancient woodland buffer zone is outside the Yarrow Bridge site boundary.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and
cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
Title: Mr  
First Name: Keith  
Last Name: Charnock  
Organisation: 

Site/location  
2. Yarrow Bridge  

Paragraph/section  

Modification  

1: Evidence why available/ suitable/ achievable?  
This site would be totally unsuitable because of the close proximity to a licenced premises, it would be a big impact on the traffic flow on the main A6 turning right out of this site with trailers and caravans at peak times would be dangerous, the entrance is on an existing bus stop with people awaiting transport another suitable stop would have to be found. The local area has been subject to a ring road which has caused traffic build up on both sides of the lights at peak times the development of this site would be detrimental to what is a Green Belt area. 

4(1): Legally compliant?  

4(2): Sound? 

5(1): Not positively prepared?  

5(2): Not justified?  

5(3): Not effective?  

5(4): Not consistent with national policy?  

6: Reasons not legally compliant/unsound 

7: Necessary changes 

8: Participate in examination? 

9: Reason participation necessary 

Councils response  

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Licensed premises are services which potential occupants can avail of and as such they contribute to the sustainability appraisal score. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
We write in connection with the above and we strongly object to the proposal to convert the Yarrow Bridge depot into a Gypsy and Traveller site.

In line with government policy, although this site is Brown belt, it is located within Green Belt area, and as such the Council would need to demonstrate exceptional circumstances to allocate this site for this particular use. We do not believe that setting up a Traveller site is classed as an exceptional circumstance.

As the site was previously used as a tip, in the era when many asbestos buildings and household electrical items such as refrigerators were dumped, this would suggest that the land could be heavily contaminated, and so would be unsuitable as residential land.

We have strong concerns about the safety of pedestrians and road users where the access is located at the bus stop on Bolton Road.

There are already problems with the amount of traffic along this road, and to bring more on to it, especially vehicles with trailers would suggest there could be serious safety problems in the future.

Due to the nature of the proposed site, there will be an increase in noise and disturbance resulting from the use of the site. This would be in the nature of noise from increased traffic, noise from generators for electricity.

After speaking to many of the residents of Springwood Drive, they also share our concerns and objections to the proposed Traveller site.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The Preferred Options report states that there are no known contamination issues.
and a low likelihood of contamination, however further checks are needed to confirm this. The nature of contamination would be verified through ground investigation works that would be undertaken as part of any proposed allocation and appropriate mitigation measures undertaken.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria g) seeks to ensure that any new development will not cause 'an unacceptable degree of noise disturbance to surrounding land uses'.
I am of the opinion that this is a very unsafe place for such a site. It is at a very busy junction and also in close proximity to two schools. The road gets very busy at this spot and more entrances would surely cause more problems. I do understand that these people are entitled to live somewhere but this spot is surely not a suitable one for them. As for planning I do not fully understand the ins and outs of such politics but I would have thought it a very unhygienic place to put them (what about the sewerage).

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

Issues of sewerage and other detailed matters would be dealt with at the detailed design/planning application stage. Advice in relation to flooding and water issues has been provided by the Environment Agency and United Utilities and this has contributed to detailed site assessments. United Utilities have stated "Foul and surface water pipes run through the site, a water main is located nearby. Therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree this when/if necessary. The location of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure". The Environment Agency have stated "Whilst the red-edged boundary in the above document shows that Site 2: Yarrow Bridge Depot, Chorley, is not located in Flood Zone 2 (medium probability of flooding), the access road to the
site from Bolton Road (A6) would be. Therefore, we would advise that no vulnerable part of the development, which in this case would be caravans, should be located in Flood Zone 2. Provided that this is adhered to, we are satisfied that the intended use for this site, if selected, would not be at an unacceptable level of flood risk.
I believe the Bolton Road site is unsuitable for the following reasons:-

1. A bus stop is located directly in front of the entrance to the site. This will cause issues regarding traffic if a bus is blocking the entrance and a vehicle is turning into the site. Due to the increase in house building in the area the traffic has considerably increased during peak hours it is not uncommon for traffic to be backed up from Chorley or from Heath Charnock so any additional traffic will have an adverse effect. Due to the bus stop also being located near two schools it could increase the possibility of an accident as the site access will be in use at all times.

2. The site is on Green Belt land which should be preserved as per Government guidelines.

3. There has been three large housing developments off Little Carr Lane, Pilling Lane & off Myles Standish Way. This has increased the demand on local services especially the primary schools which are already over subscribed.

4. Due to the sites location to the river further developments could increase the possibility of flooding

I hope you take my comments into consideration.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and
cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
Lancashire County Council Education Department contributed to the process of additional school places in Chorley and did not raise any such issues. The existing Traveller community children already avail of school places in Chorley Borough.
The Environment Agency have stated "Whilst the red-edged boundary in the above document shows that Site 2: Yarrow Bridge Depot, Chorley, is not located in Flood Zone 2 (medium probability of flooding), the access road to the site from Bolton Road (A6) would be. Therefore, we would advise that no vulnerable part of the development, which in this case would be caravans, should be located in Flood Zone 2. Provided that this is adhered to, we are satisfied that the intended use for this site, if selected, would not be at an unacceptable level of flood risk".
<table>
<thead>
<tr>
<th>Rep No</th>
<th>GT184</th>
<th>Client ID</th>
<th>166</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title:</td>
<td>Mr</td>
<td>First Name:</td>
<td>James</td>
</tr>
<tr>
<td>Last Name:</td>
<td>MacLeod</td>
<td>Organisation:</td>
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<tr>
<td>Site/location</td>
<td>2. Yarrow Bridge</td>
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### Paragraph/section

### Modification

1: Evidence why available/ suitable/ achievable?

2: Agree with preferred site?

3: Comments on document

I would like to oppose the planned consideration of using the Former Depot at Yarrow Bridge, Bolton Road, Chorley PR7 4AB on the grounds that the proposed site is within the Green Belt and is in an area of natural beauty and wildlife. The erection or allowance of any habitation would put this at risk and would not be in keeping with the local area.

I would also like to object on the grounds of the increased disruption that this site would cause to one of the main arterial routes into Chorley. The new lights at Myles Standish Way have already created traffic flow problems particularly at rush hour, and should this site be selected together with the road widening and carriageway crossings being suggested by the highways agency it would compound the problem and adversely affect the traffic flow. Coupled with this, having a site entrance in close proximity to a bus stop, given the size of the vehicles entering the site, would create a hazard to anyone alighting the bus at this location.

I believe that on these grounds this site should be removed from the list of proposed locations.

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared? □

5(2): Not justified? □

5(3): Not effective? □

5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

### Councils response

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The character and appearance of an area is protected under national policy guidance and Local Plan policies such as BNE1: Design Criteria for New Development and Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt which requires development to respect the character of the landscape and have regard to the need to integrate the development with its surroundings.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to
mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
Title: Mr  First Name: Derek  Last Name: Haslam  Organisation:

Site/location  2. Yarrow Bridge

Paragraph/section

Modification
1: Evidence why available/ suitable/ achievable?
2: Agree with preferred site?
3: Comments on document

The allocated form on Chorley BC website is ridiculously complicated. i.e. – in PDF format which needs converting before its usable.

I think the above site for a permanent Gypsy Travellers home is unsuitable for the following reasons:

1. It would be accessed by lorries etc. to and from a very busy main road.
2. It is very close to two School playgrounds, one of which is used by small children and on full view from the footpath.
3. It backs on to the River Yarrow which has been the subject of a major clean up in recent years and inevitably there would be pollution from the site.
4. It would be next to one of our bigger residential Premier inns and would have an adverse effect on economic growth and could in fact cause its demise.

4(1): Legally compliant?
4(2): Sound?

5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Proximity to schools is a positive Sustainability Indicator. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

There are planning policies and environmental health legislation that would cover this issue e.g. Core Strategy Policy 29: Water Management which seeks to improve water quality, water management and reduce the risk of flooding. The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.
Rep No  GT189  Client ID  171
I am writing with my concerns regarding the proposed permanent site for a ‘Traveller’ site for Travellers who are going to be permanently resident.

As an aside comment: The format of your consultation is not accessible to all as you are expecting a pdf form to be printed out, then completed and scanned in to email back to you. The pdf cannot be typed into and not only do people not have these facilities the form is not easy to understand. I am therefore emailing my comments.

My first point is that if people want to live permanently in an area then there is accommodation available to rent or to buy. There seems to be a lot of money going to be used to create a Gypsy and Traveller site which could be spent elsewhere.

Secondly, I do not think that greenfield sites should be used for this purpose. It is destroying the natural beauty of places within Chorley and having an impact on the natural habitat and ecology of the area.

I am writing with particular opposition to Site 2 Yarrow Bridge Depot. It is not a good location for a permanent site for the following reasons:

It will have an adverse impact on the natural environment, there is a lot of wildlife in this area with deer, foxes, badgers, herons, squirrels being seen there.

It is out of keeping for the area which consists of woods, Duxbury park, the canal side, the river etc., low density housing, semi-rural.

The nearest primary school is a Church of England school which requires regular church attendance and is always oversubscribed. Other primary schools are some distance away.

There has recently been a housing development (Arley Homes) which has put increased pressure on services in the area including the school.

There are no shops nearby, there is no GP surgery nearby, there is no chemist nearby.

The entrance to the site is where there is an existing bus stop – this is an issue for safety.

The stretch of road here is particularly busy and the traffic lights created by the Myles Standish Road have created bottlenecks at rush hour. Having large vehicles coming and going is going to be hazardous. It is a known stretch for accidents and fatalities.

In the past the school (St Georges) has requested the services of a lollypop person to help people across the road and this was refused. So why can money now be spent on crossings for 5 potential families?

The area has issues for flooding and creating a site could aggravate the drainage issues.
I am not as familiar with the proposed site at Cowling Farm. However, some of the reasons (e.g. greenfield site) I have used above are likely to apply to this proposed site and I do feel that there are probably more suitable brownfield sites which could be used if explored further.

I hope that my comments can be taken into account even though I have not used your form.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

The representation form was made available within Survey Monkey and the Council made representors aware they would accept comments by email/letter rather than by representation form.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The character and appearance of an area is protected under national policy guidance and Local Plan policies such as BNE1: Design Criteria for New Development and Policy BNE5: Redevelopment of Previously Developed Sites in the Green Belt which requires development to respect the character of the landscape and have regard to the need to integrate the development with its surroundings.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

The Environment Agency have confirmed "Whilst the red-edged boundary in the above document shows that Site 2: Yarrow Bridge Depot, Chorley, is not located in Flood Zone 2 (medium probability of flooding), the access road to the site from Bolton Road (A6) would be. Therefore, we would advise that no vulnerable part of the development, which in this case would be caravans, should be located in Flood Zone 2. Provided that this is adhered to, we are satisfied that the intended use for this site, if selected, would not be at an unacceptable level of flood risk".

Lancashire County Council Education Department contributed to the process of additional school places in Chorley and did not raise any such issues. The existing Traveller community children already avail of school places in Chorley Borough.
I am writing to you about the proposed provision for a permanent Gypsy and Traveller Site within the borough of Chorley.

I reside on the Duxbury estate and am writing to ask you to note my comments in respect of the former depot at Yarrow Bridge, Bolton Rd, Chorley, PR7 4AB as a resident in the area, I am not writing in a professional capacity.

I have no objection at all to a permanent site being found in Chorley and don't object, out of hand, to the proposal to the use of the site at Yarrow Bridge.

My only observation would be traffic safety in light of the fact that the A6 is a very busy road already in that area especially since the building of Myles Standish Way. Within a short distance you would have traffic joining the A6 from a number of junctions starting with Carr Lane, then Hoggs Lane, the proposed site, the public house, Taylor’s Garage, Springwood Drive, Myles Standish Way, Duxbury Park (people often park outside the park entrance), Worcester Place and then Wigan Lane. There are also a number of properties on the A6, which access onto the A6 directly.

I am not sure if it would be safe to introduce another form of access to the A6 at that site and given that the land is surrounded by existing properties and the canal it’s hard to see how safe access and egress could be achieved in light of the existing traffic issues in that area. My observations are made with everybody’s interests in mind and strictly from a road safety point of view, I have no objection in principle to a permanent site being found for Travellers in Chorley.

Councils response

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or
right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
I would like to place my objection to ever using the Former Depot at Yarrow Bridge, Bolton Road, Chorley. Thank you for the opportunity of having an input to the decision. I am however a little disappointed that apparently none of the residents in the area have received any official paperwork from the planning department. I was away last week and returned to a leaflet from local Councillors notifying us of the possibility of a Gypsy and Traveller site a mere 300 metres from my house. The fact we haven't been notified officially is another matter and one I will be pursuing at a later date.

I have read your Chorley Local Plan 2012-2026 Gypsy and Traveller and Travelling Showpeople and associated paperwork relating. The survey seems to be more concerned with affecting Nature 2000 sites and the suitability for the Travellers rather than the local residents. The fact that a potential site could affect something 17 km away would indicate that it could have an impact on the local community.

The site is located within 200m of a school, on a main access road into Chorley.

There would definitely be an impact on the local area. The impact created from these sites in known from historical data.

Will the residents contribute to the local Council?

Will local residents receive a reduction in Council tax for having the site close to their houses?

Will people receive compensation for the reduction in the value of their houses if they come to sell?

How will the Council ensure the site does not grow into more than the allocated number of pitches?

I realise that these people need somewhere to stay, but everyone in the local area has to contribute to maintain the local community.
Elsewhere in Europe other countries create local sites placing them away from the local populace in areas where they can live their chosen lifestyles without affecting local populations.

Your policy documentation takes everything into consideration except the local residents.

7: Necessary changes
I believe that local people should be able to have a say on the suitability of a site before a decision is made.

8: Participate in examination?

9: Reason participation necessary

Councils response

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis.

Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.

A permanent site would be designed and laid out to accommodate all of the Traveller needs within the site itself.

The Council will work with key stakeholders, including the local residences and businesses, the Travelling community and the police architectural liaison officer, an appropriate access, location, design and layout could be arrived at. This process would contribute to a ‘cohesive’ community.

The approach to site selection has been informed by a sustainability assessment, an approach considered robust by the Chorley Local Plan Inspector. Placing a site 'away from the local populace' would be an unsustainable approach and contrary to national and local planning guidance.
Title: Mr
First Name: Brian
Last Name: Allman
Organisation: Ramblers Association

Site/location
2. Yarrow Bridge

Paragraph/section
Modification

1: Evidence why available/suitable/achievable?

2: Agree with preferred site?

3: Comments on document
Land behind the Yarrow Bridge pub in Green Belt, although it is well hidden we are unable to set a precedent of inappropriately using Green Belt land.

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared? □

5(2): Not justified? □

5(3): Not effective? □

5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response
Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
Title: Mr  
First Name: Eric  
Last Name: Nickson  
Organisation:  

Site/location  
2. Yarrow Bridge  

Paragraph/section  
Modification  

1: Evidence why available/suitable/achievable?  
This site is totally unsuitable, access and egress will be difficult on an extremely busy major road, where there has been several fatalities in the recent years. The area is one of high residential use and close to two schools and will not be improved with the addition of a Gypsy caravan site in the Green Belt area which should not be used except in very special circumstances which have not been demonstrated.  

2: Agree with preferred site?  
Yes  

3: Comments on document  
The way we found out about this application by word of mouth is totally unacceptable, I do not believe that the Council has consulted adequately on this particular site.  

4(1): Legally compliant?  

4(2): Sound?  

5(1): Not positively prepared?  

5(2): Not justified?  

5(3): Not effective?  

5(4): Not consistent with national policy?  

6: Reasons not legally compliant/unsound  
Not qualified to comment on the quality of the Preferred Options document, whether it is legally compliant or sound in terms of the Framework. My objection is to the Yarrow Bridge depot site which I consider totally unsuitable.  

7: Necessary changes  
Remove the Yarrow Bridge depot site from the plan and develop it as recreational use in the Green Belt area, a small park would be acceptable or something similar.  

8: Participate in examination?  
No  

9: Reason participation necessary  

Councils response  
Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.  

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm
received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.
It is inappropriate to subject Gypsy and Traveller families to the traffic dangers around the former Depot at Yarrow Bridge. The movement of many parents and ‘wide ranging aged’ children to, from and around St George’s CE Primary and Albany Science College, coupled with the regular congestion on the A673 and B5252 at Bolton Road, make the area one of much danger which should not be increased by bringing in more residents and vehicles.

Objection noted. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no ‘exceptional’ circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

Lancashire County Council Highways have considered relevant highways issues and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
I wish to place on record my strongest possible objection to the proposed provision for a permanent Gypsy and Traveller Site at the above location. My concerns are as follows:

1. Public safety - the entrance is situated behind a busy bus stop on the main A6 road. Does this mean that a new entrance will have to be created? The footpaths are regularly used by St Georges CE primary School and Albany High School. The traffic on the main road is busy, particularly at peak times and rush hour. I am worried for the safety of both pedestrians and cyclists.

2. I am concerned about the money which will have to be invested in the site to make it habitable and safe. Another concern is the investment to the main A6 to facilitate the increased traffic at this point and the safety of pedestrians and cyclists (the installation of pedestrian/zebra crossings).

3. Chorley is going to have little or no Green Belt areas as the boundaries are constantly being changed.

4. I am concerned that the introduction of this site would have a significant impact on the privately owned dwellings and businesses in the area.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.
I wish to raise an objection to the proposal for a Gypsy & Traveller Site at the former Depot at Yarrow Bridge, Bolton Road, Chorley. The reasons are:

1. The depot is situated on a very busy road which has a high volume of traffic at most times of the day and this is a road notorious for serious accidents.
2. It is quite difficult to access the A6 from side roads and any increase in traffic flow would only serve to worsen the situation.
3. The site is also in close proximity to three schools (Albany, St Georges and Holy Cross) and the increased traffic would be detrimental to the safety of anyone using the schools.
4. The entrance to the site is currently a bus stop which is well used, especially at school times.
5. It also close to some excellent local amenities (Duxbury Park, Yarrow Valley and West Pennine Moors) and it would seem more suitable for development as an additional amenity to enhance the Chorley image.

I also wish to lodge a complaint that information on this proposal was not circulated to all local residents and I was only made aware of it at a very late stage.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.

The Council’s Statement of Community Involvement sets out the approach to
consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Information on sites for development has been gathered from various sources over a number of years:

- The first call for sites was carried out by Chorley Council for a six week period in September/October 2005.
- The second was carried out jointly with Preston and South Ribble Councils for a six week period in July/August 2007. Landowners and developers were invited to put forward land for consideration for development.
- A further community survey relating to site suggestions ended on the 26th January 2010. The intention of this exercise was to ascertain whether the community felt that there were sites that would be particularly suitable for non-built development e.g. sport and recreation or conversely be protected from changes of use. After this deadline the Council continued to accept other site suggestions.
- The January 2010 community survey consultation resulted in a site for travelling Showpeople being suggested at Yarrow Bridge. This is one site now out for consultation.
- The Issues and Options Discussion paper brought together results of the ‘call for sites’ exercise and was the first proposals stage of the Site Allocations and Policies paper (now Chorley Local Plan). Consultation ran from December 2010 until February 2011.

Following the above the Local Plan went through further stages:

- The Preferred Option consultation on the Site Allocations and Development Management Policies ran from 16 September 2011 and was originally planned to end on the 28 October 2011 however this was extended by three weeks to the 18 November 2011 due to the amount of public interest it generated.
- The Publication deposit stage of the Chorley Local Plan 2012-2026 (previously referred to as the Site Allocations and Development Management Policies Development Plan Document) ran from 19 October 2012 for six weeks to 30 November 2012.
- The Local Plan was submitted to the Planning Inspectorate in December 2012 and the Examination was held in April 2013.

Furthermore the Council undertook consultation with Gypsy, Traveller and Travelling Showpeople themselves and engagement with relevant stakeholders and Chorley’s temporary Traveller and permanent residents as part of the Central Lancashire Gypsy and Traveller Accommodation Assessment (GTAA - summer 2013 and still ongoing). Gypsy and Traveller and Travelling Showpeople Assessment (GTAA) matters have been reported to the Central Lancashire Joint Advisory Committee over a number of years. All the above Local Plan stages have also been reported to Chorley’s Executive Cabinet as part of the plan making process and on-going consultation. Elected members have endorsed this approach at Full Council.

The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.
Title: Mr
First Name: Keith
Last Name: Charnock
Organisation:

Site/location: 2. Yarrow Bridge

Paragraph/section

Modification

1: Evidence why available/suitable/achievable?
2: Agree with preferred site?
3: Comments on document

This site would be totally unsuitable because of the close proximity to a licenced premises, it would be a big impact on the traffic flow on the main A6 turning right out of this site with trailers and caravans at peak times would be dangerous, the entrance is on an existing bus stop with people awaiting transport another suitable stop would have to be found. The local area has been subject to a ring road which has caused traffic build up on both sides of the lights at peak times the development of this site would be detrimental to what is a Green Belt area.

4(1): Legally compliant?
4(2): Sound?

5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound
7: Necessary changes

8: Participate in examination?
9: Reason participation necessary

Councils response

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Licensed premises are services which potential occupants can avail of and as such they contribute to the sustainability appraisal score.

Lancashire County Council Highways have considered relevant highways issues including the bus stop and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
Heard that you may be considering the former depot at Yarrow Bridge. We would strongly disagree with this site as we just bought our house in a lovely quiet area. We had to take out a mortgage and the Travellers will get this site for free. Think all the houses on our street should be made aware of this and would like to attend any meetings.

Objection noted. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
As ward Cllrs for S-East Chorley, we have received a number of representations regarding the potential use of the former Council Depot site at Yarrow Bridge, Bolton Road as a Gypsy & Traveller site. The overwhelming number of these representations have been opposed to the site being considered as a suitable site for some the following reasons:

- Traffic issues accessing onto a very busy A road
- Potential flood risk of the site
- Potential contaminated land on site
- Lack of school places locally. Primary schools already over-subscribed
- Detrimental effect on neighbouring businesses – Hotel & Public House
- Possible Community Cohesion problems
- Potential Pollution of the River Yarrow

And also many other reasons as stated in residents letters.

We therefore wish to record our support for the residents of this area and place on record our objection to this site being considered as a permanent Traveller site.

Councils response

Objection noted. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

Lancashire County Council Highways have considered relevant highways issues and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
The Environment Agency have confirmed "Whilst the red-edged boundary in the above document shows that Site 2: Yarrow Bridge Depot, Chorley, is not located in Flood Zone 2 (medium probability of flooding), the access road to the site from Bolton Road (A6) would be. Therefore, we would advise that no vulnerable part of the development, which in this case would be caravans, should be located in Flood Zone 2. Provided that this is adhered to, we are satisfied that the intended use for this site, if selected, would not be at an unacceptable level of flood risk". The Preferred Options report states that there are no known contamination issues and a low likelihood of contamination, however further checks are needed to confirm this. The nature of contamination would be verified through ground investigation works that would be undertaken as part of any proposed allocation and appropriate mitigation measures undertaken.

Lancashire County Council Education Department contributed to the process of additional school places in Chorley and did not raise any such issues. The existing Traveller community children already avail of school places in Chorley Borough. The Council considers that actual or perceived impact on property values and businesses is not a material planning consideration.

The Council will work with key stakeholders, including the local residences and businesses, the Travelling community and the police architectural liaison officer, to provide an appropriate access, location, design and layout. This process would contribute to a 'cohesive' community.

There are planning policies and environmental health legislation that would cover this issue e.g. Core Strategy Policy 29: Water Management which seeks to improve water quality, water management and reduce the risk of flooding.
Modification

1: Evidence why available/ suitable/ achievable?

2: Agree with preferred site?

3: Comments on document

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• Potential Pollution of the River Yarrow

And also many other reasons as stated in residents letters.

We therefore wish to record our support for the residents of this area and place on record our objection to this site being considered as a permanent Traveller site.

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared? □

5(2): Not justified? □

5(3): Not effective? □

5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response

Objection noted. Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

Lancashire County Council Highways have considered relevant highways issues and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
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Lancashire County Council Education Department contributed to the process of additional school places in Chorley and did not raise any such issues. The existing Traveller community children already avail of school places in Chorley Borough.

The Council considers that actual or perceived impact on businesses is not a material planning consideration.

The Council will work with key stakeholders, including the local residences and businesses, the Travelling community and the police architectural liaison officer, to provide an appropriate access, location, design and layout. This process would contribute to a 'cohesive' community.

There are planning policies and environmental health legislation that would cover this issue e.g. Core Strategy Policy 29: Water Management which seeks to improve water quality, water management and reduce the risk of flooding.
As ward Cllrs for S-East Chorley, we have received a number of representations regarding the potential use of the former Council Depot site at Yarrow Bridge, Bolton Road as a Gypsy & Traveller site. The overwhelming number of these representations have been opposed to the site being considered as a suitable site for some of the following reasons:

• Traffic issues accessing onto a very busy A road
• Potential flood risk of the site
• Potential contaminated land on site
• Lack of school places locally. Primary schools already over-subscribed
• Detrimental effect on neighbouring businesses – Hotel & Public House
• Possible Community Cohesion problems
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We therefore wish to record our support for the residents of this area and place on record our objection to this site being considered as a permanent Traveller site.

Council's response

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Lancashire County Council Highways have considered relevant highways issues and stated that there may need to be localised widening and/or right turn provision to facilitate such an allocation. Suitable local safety improvements will also be expected to be carried out within close proximity of the site access to mitigate any adverse impact on the safety of road users, particularly pedestrians and cyclists. This should include appropriate surface level crossings such as pedestrian refuges, zebra crossings etc.
The Environment Agency have confirmed "Whilst the red-edged boundary in the above document shows that Site 2: Yarrow Bridge Depot, Chorley, is not located in Flood Zone 2 (medium probability of flooding), the access road to the site from Bolton Road (A6) would be. Therefore, we would advise that no vulnerable part of the development, which in this case would be caravans, should be located in Flood Zone 2. Provided that this is adhered to, we are satisfied that the intended use for this site, if selected, would not be at an unacceptable level of flood risk".

The Preferred Options report states that there are no known contamination issues and a low likelihood of contamination, however further checks are needed to confirm this. The nature of contamination would be verified through ground investigation works that would be undertaken as part of any proposed allocation and appropriate mitigation measures undertaken.

Lancashire County Council Education Department contributed to the process of additional school places in Chorley and did not raise any such issues. The existing Traveller community children already avail of school places in Chorley Borough.

The Council considers that actual or perceived impact on businesses is not a material planning consideration.

The Council will work with key stakeholders, including the local residences and businesses, the Travelling community and the police architectural liaison officer, to provide an appropriate access, location, design and layout. This process would contribute to a ‘cohesive’ community.

There are planning policies and environmental health legislation that would cover this issue e.g. Core Strategy Policy 29: Water Management which seeks to improve water quality, water management and reduce the risk of flooding.
I must strongly object to this proposal as I have just recently moved to Coltsfoot Drive with my young family so I can raise my children in a quiet, peaceful and friendly area.

I have experienced living near a Travellers site in Blackpool and if I had been aware this proposal was being considered I would have had second thoughts about moving to this area.

I have spoken to other neighbours and they are all against this, and if this area is put forward I will be contacting the MP to further our protests.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
We strongly oppose the positioning of Gypsy and Traveller sites within residential areas and especially the proposed site Cabbage Hall Fields.

It is unfair on the existing residents to change the character and nature of their immediate community in such a way when they have invested in those areas. The proposed site is not in keeping with the area. Positioning a site like this with the associated potential for noise and disturbance and the resulted increase in traffic would have a detrimental impact on all the neighbours and could potentially cause conflicts between the residential community and the Travellers.

There will be a loss of privacy to the existing community in Coltsfoot Drive and all the gardens which back on to the field.

We feel Gypsy and Traveller sites are best located out of town and in non-residential areas.

Travellers do not generally like to be accommodated in close proximity to residential areas and prefer to be in areas where they can go about their business without being disturbed.

Also we have 2 dog’s and also offer a home boarding service for dog’s which would be highly effected by the proposed site as customers would be put off using our service as there would be a Traveller site directly behind our house, this in turn causing us loss of potential earnings and could be detrimental to our new business venture.

Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria g) seeks to ensure that any new development will not cause ‘an unacceptable degree of noise disturbance to surrounding land uses’.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five
plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
We have been residents at Coltsfoot Drive for the past few years. The area is very quiet. We understand you may use this field to accommodate Travelling families. Some of our concerns would be noise, pollution, traffic, activity during the night. Our eldest child suffers from Crohns Disease, our youngest has a heart condition and I am recovering from heart surgery, my partner is also unwell. The reason we bought our home was mainly to help us all to recover and lead a stress free life at home.

The site if chosen we fear would affect our health further, the house prices may suffer and we are not in a position to move home to escape stress at present.

We would love to live in our house with the peace and quiet we enjoy at present and hope you will consider our point of view as Chorley residents on Coltsfoot Drive.

Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria g) seeks to ensure that any new development will not cause 'an unacceptable degree of noise disturbance to surrounding land uses'.
The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted.
The Council considers that actual or perceived impact on property values is not a material planning consideration.
There are planning policies and environmental health legislation that would cover this issue e.g. Core Strategy Policy 29: Water Management
Lancashire County Council has no highway objections to this proposal and have no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site.
The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
I think this goes without saying that this proposal causes me great concern as a home owner. It is my opinion that this site will reduce the value of my property. If in the future I decide to sell my house I believe it will also dissuade potential buyers. Therefore I strongly object to this proposal.

Objection noted. The Council considers that actual or perceived impact on property values is not a material planning consideration. The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
We feel that this type of site behind our property will devalue the price. Had we known 3 years ago we would not have purchased this property.

It makes an ideal site for children to play.

Our other main concern is access to this site as we already have problems with cars parked on the pavement next to our property by people who work on the industrial estate. If access to the proposed site is from Drumhead Road this would make it an open road with temptation for HGV’s to use this road via Cowslip, to exit the industrial area as a short cut even restricted weight would cause more traffic using this road.

The Council considers that actual or perceived impact on property values is not a material planning consideration. The site is not allocated as a children’s playspace, rather it is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of residential development is accepted.

Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site. It is not proposed that Cowslip Way and Drumhead Road are connected and open for vehicular traffic.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
As Borough Councillors we have been contacted by local residents on the Hartwood estate and Thornhill Road estate to express the following views. They hold such views as they have past experience on numerous occasions or Traveller encampments. A lot of residents are elderly on the Hartwood estate and are frightened.

There is concern over the level of the consultation and dismay that residents bordering onto the proposed sites have not been formally consulted with.

Cabbage Hall Fields as a permanent Traveller site is totally unsuitable as it is the only greenspace in the area and acts as a buffer zone between Coltsfoot Drive and Chorley North Industrial Estate. It is the only area where children can play.

There is concern about access to the site even though the proposal limits it to access via Drumhead Road. As there is only one access in and out of the industrial estate we are aware of problems with lorries jack knifing in bad weather causing major road closures lasting for a number of hours and therefore there would be a temptation to use Cowslip Way as an alternative. As a lot of workers park on the estate this would cause great problems.

As Councillors we are concerned over community cohesion as local businesses have suffered over the years and are still resentful.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are
added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The site is not allocated as a children’s playspace, rather it is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of residential development is accepted.

The Council considers that actual or perceived impact on property values is not a material planning consideration.

Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site.

It is not proposed that Cowslip Way and Drumhead Road are connected and open for vehicular traffic.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
I wish to object against this proposed site. The view of the site from Coltsfoot Drive would give the appearance of the Travellers being caged in and is totally unacceptable.

Objection noted. Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and buildings. The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
Title: Ms  
First Name: Stacey  
Last Name: Welch  
Organisation:  
Site/location: 3. Cabbage Hall Fields

Paragraph/section:  
Modification:  
1: Evidence why available/ suitable/ achievable?  
2: Agree with preferred site?  
3: Comments on document  
   I do not want this field area to be used to this community of people in this way. I feel this will affect the price of my house and decrease this and I am a single mum with 2 small children and will feel extremely vulnerable if this area is used in this way. I want to field to remain a field with the trees and plant life. A lot of residents in this estate use this field as a walk through to experience nature and countryside as I do with my 2 children. I therefore oppose to this site being used as land for Gypsy, Traveller and Travelling Showpeople.

4(1): Legally compliant?  
4(2): Sound?  
5(1): Not positively prepared? ☐  
5(2): Not justified? ☐  
5(3): Not effective? ☐  
5(4): Not consistent with national policy? ☐  
6: Reasons not legally compliant/unsound  
7: Necessary changes  
8: Participate in examination?  
9: Reason participation necessary  
Councils response  
The site is not allocated as open space, rather it is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of residential development is accepted. Local Plan policies will ensure that trees and landscaping is protected as appropriate. The Council considers that actual or perceived impact on property values is not a material planning consideration. The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
I write to advise you that we cannot envisage Cabbage Hall Fields as an agreeable location for Travellers be it as permanent or overnight resting places that are sought. Please be assured that I have taken into consideration that Travellers may require accommodating by provision of a new area to stay however this site is not in our opinion suitable for this purpose.

Firstly, our cul-de-sac is a child friendly area, all the neighbourhood children play outside on the pavements together running from garden to garden, all the neighbours know each other. Encouraging strangers into the area who frequently come and go would seriously impact on the safe environment that has been established. Furthermore, the introduction of Travellers to this immediate area would bring increased and unwelcome volumes of traffic to the narrow winding roads of our residential estate, again making the situation more hazardous for people crossing roads/playing outside etc.

Further concerns arise when the impact on the environment is considered i.e. where would all the waste/rubbish created by the Travellers be left? Then in regards to education if a proposed site were to be made permanent this would place an even greater strain on the already overcrowded and under resourced local schools, this would be unfair on our children. In addition to these facts and from an economic point of view the property value of the immediate area would reduce, this would be detrimental to homeowners.

From a personal point of view, my partner and I have recently moved to this quiet area for the peace and tranquillity. Our home is ideally placed for us with open fields to the rear and a discreet cul-de-sac to the front, due to us having two children and expecting a new baby. In addition I work night shifts and sleep during the day, meaning my wife is left in the house with young children at night. If Travellers were to move into the back of our garden if would leave my wife feeling very vulnerable with strangers looking into our house and insecure in her own home. Furthermore I would not be able to sleep in the day with the constant noise of people driving backwards and forwards from a site next to my home.

In conclusion if the area must be developed then making the site into secure play areas/parks for our local neighbourhood would be such a valuable asset to the area and would assist in stopping the children from playing on the roads, obviously with the far side of the site having hazardous industrial areas then suitable gates or railings would need to be installed. However, this would reassure us as local residents that our immediate area remains safe for our families to enjoy the outdoors.

I hope that our opinion is duly noted and considered before any decision is made with regards to the above matter. I do understand that the preferred site of Cowling Farm has been suggested for Travellers to avail themselves of however I do feel very strongly against the proposed site of Cabbage Hall Fields therefore thought it my duty to respond in writing.
The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted.
The Council considers that actual or perceived impact on property values is not a material planning consideration.
There are planning policies and environmental health legislation that would cover this issue e.g. Core Strategy Policy 29: Water Management.
Any application would have to satisfy Local Plan Policies BNE1:Design Criteria for New Development, protecting general amenity and covering noise and landscaping/tree issues. As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.
Lancashire County Council Education Department contributed to the process of allocation for housing and did not raise any such issues. The existing Traveller community children already avail of school places in Chorley Borough.
Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site.
It is not proposed that Cowslip Way and Drumhead Road are connected and open for vehicular traffic.
The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
We would like to make the following comments:

- There is only one access road into the existing housing estate and we already have problems concerning parking from workers from the industrial estate using the street as a car park. When there is snow and ice on the ground it can be extremely difficult to drive up out of the estate. It would therefore be very difficult to get a number of caravans and trailers down this road.

- The land in question is not flat and has several severe changes in level. The lower area is known to get very boggy during wet weather as there used to be a pond in the area before the land was industrialised.

- When Travellers have illegally stayed on the industrial estate in the past we have problems with anti-social behaviour, noise and waste being left everywhere.

- Although the plans are for a small number of pitches, there would, most probably be more than the allowed number of caravans as has happened at other sites in the past.

We are sure that there are other sites with better access and more level ground that would be more suitable to the needs of the Travellers and would not cost the Council as much to develop.

We would also like to add that we are very concerned that we have not had any prior correspondence concerning the proposals for this site and that the first we heard was when our local Councillors came round the estate to inform us. Although we realise that a site has to be provided to meet Government criteria we feel that a site that is directly next to an existing housing estate with poor access would not be suitable.

The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted.
The Council considers that actual or perceived impact on property values is not a material planning consideration. There are planning policies and environmental health legislation that would cover this issue e.g. Core Strategy Policy 29: Water Management

Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site.

It is not proposed that Cowslip Way and Drumhead Road are connected and open for vehicular traffic.

Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and buildings. The Council will continue to work with relevant stakeholders including the police and local community in respect of the design and layout of any Traveller site and community cohesion issues. In relation to the number of caravans, occupiers would have to comply with a planning application permission which would control the number of caravans.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
I understand that Northgate Drive and Cabbage Hall Fields could be potential sites to provide a permanent site for Travellers. As a resident of Coltsfoot Drive, I would not like either of these sites to be considered as the area is already quite built up and a low-cost residential area where families tend to set up house and I do not think that this would be suitable for Travellers or for the current residents of the area.

I would think that a more open space not near to any community should be considered and should be grateful if you would note my comments.

Allowing Travellers to occupy an area near Coltsfoot Drive would only result in problems for the current residents and the reduction of property values.

The Council considers that actual or perceived impact on property values is not a material planning consideration. The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.

The site is allocated for housing in the Chorley Local Plan 2012-26, therefore the principle of development is established.
I am writing this letter to voice my deep concern and disagreement at the recently announced plans to accommodate the caravans of a number of Travellers and their families on the field near my home. I have lived at my address for the past 13 years during which time I, and other local families, have had their children play on the field at the end of our cul-de-sac as it’s the only safe local place. The proposed plans would disrupt and threaten our quality of life and that of our children, as well as propose health and safety risks due to the increased flow of traffic that will be expected down our cul-de-sac.

All my neighbours are in total disagreement with your plans and we would strongly request that you revise your proposal.

I am happy to talk with you about this as are my neighbours and we would welcome a visit to our street for an open discussion.

The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted.

Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site.

It is not proposed that Cowslip Way and Drumhead Road are connected and open for vehicular traffic.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
We wish to register our protest at the proposed Gypsy Roma Traveller site between Coltsfoot Drive/Poppy Avenue, Chorley. Not only has the site not been previously mentioned as a proposed site, but we feel it has been slipped in quietly as a site without any prior discussion!

It is a most unsuitable venue, as a cul-de-sac with only one congested access for traffic, which would increase, particularly with vans, four by fours and trailers and caravans but would increase the danger of accidents for residents, particularly the elderly and children.

The associated issues with the siting of the Travelling community on the enclosed, relatively small piece of land does not seem at all appropriate and brings into question what is wrong with the current site or the other preferred site: Cowling Farm? Is the power of the purse and vote in those two areas stronger than on the Thornhill Estate? We wonder what has changed?

The estate currently has issues and problems on parts of it and the introduction of more problems and issues seems ludicrous!

We wish to strongly protest at the siting of this site on the land between Coltsfoot Drive/Poppy Avenue.

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The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are
added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of sites received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026. The Council is tasked with allocating a site for a minimum of 5 pitches as directed by the Local Plan Inspector. The figure of 5 is expressed as a minimum in the context of ongoing research. A final Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment will inform definitive need figures which will be progressed through a separate Gypsy and Traveller and Travelling Showpeople local plan. Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site. It is not proposed that Cowslip Way and Drumhead Road are connected and opened for vehicular traffic. The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted. The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
I wish to object to the proposal. I consider it totally unsuitable as it is the only green space in the area and acts as a buffer zone between Coltsfoot Drive and Chorley North Industrial Estate. It is the only area where children can play.

I am concerned about access to the site even though the proposal limits it to access via Drumhead Rd. As there is only one access in and out of the industrial estate I am aware of problems with lorries jack knifing in bad weather causing major problems and therefore there would be a temptation to use Cowslip Way as an alternative. As a lot of workers park on the estate this would cause great problems.

The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted. Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site.

It is not proposed that Cowslip Way and Drumhead Road are connected and opened for vehicular traffic.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
Title: Miss  
First Name: Janet  
Last Name: Fairhurst  
Organisation: 

<table>
<thead>
<tr>
<th>Site/location</th>
<th>3. Cabbage Hall Fields</th>
</tr>
</thead>
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<tr>
<td>Paragraph/section</td>
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<td>2: Agree with preferred site?</td>
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<td>3: Comments on document</td>
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<td>4(2): Sound?</td>
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<td>5(2): Not justified?</td>
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<tr>
<td>Councils response</td>
<td>The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted. Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site. It is not proposed that Cowslip Way and Drumhead Road are connected and opened for vehicular traffic. The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.</td>
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</table>
I wish to object to the proposal. I consider it totally unsuitable as it is the only green space in the area and acts as a buffer zone between Coltsfoot Drive and Chorley North Industrial Estate. It is the only area where children can play.

I am concerned about access to the site even though the proposal limits it to access via Drumhead Rd. As there is only one access in and out of the industrial estate I am aware of problems with lorries jack knifing in bad weather causing major problems and therefore there would be a temptation to use Cowslip Way as an alternative. As a lot of workers park on the estate this would cause great problems.

The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted. Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site.

It is not proposed that Cowslip Way and Drumhead Road are connected and opened for vehicular traffic.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
I am writing with my objection to the proposed permanent Traveller site on Cabbage Hall Fields. I work on Chorley North Industrial Park and have had personal experience of Gypsies setting up camp on our works car park and also our tenants. Businesses could not carry out their day to day business. I would not like any Travellers sites in Chorley and this is not just a knee jerk reaction.

Objection noted.
The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted.
The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
I am writing with my objection to the proposed permanent Traveller site on Cabbage Hall Fields. I live on Thornhill Road and consider it totally unsuitable as it is the only greenspace in the area where children can play and acts as a buffer zone between Coltsfoot Drive and Chorley North Industrial Estate.

I am concerned about the access to the site even though the proposal limits it to access via Drumhead Road. As there is only one access in and out of the industrial estate I am aware of problems with lorries jack knitting in bad weather causing major problems and therefore there would be a temptation to use Cowslip Way as an alternative.

I work on the Chorley North Industrial Estate and have experienced Travellers setting up camp on the estate.

This is not an acceptable site and I urge the Council to vote against this plan.

The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted.

Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site.

It is not proposed that Cowslip Way and Drumhead Road are connected and open for vehicular traffic.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
As a local employer I am writing to strongly object to the proposed permanent Traveller site on Cabbage Hall Fields.

Who funds the project? I am going to assume this would be funded by local business and residential rate payers, these businesses and residents are already delivered short in service. What exactly does our rates get spent on - we pay for our own waste collection, water rates and even water running off our roofs. We pay electric and gas and even pay for a security company to look after our premises, this leaves our rates going to the Council and the police.

I understand that access to the site is to be via Drumhead Road on the industrial estate itself, this cannot be a consideration and is not acceptable in any shape or form, we have sufficient traffic flow on occasions as it is and it will introduce pedestrians and children into the area which is completely unacceptable. I ask you to consider the first incident or worst still accident involving a Travellers child will see this letter being brought up and all the Councillors involved in the decision will be brought into question should this be passed.

The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted.

A number of delivery models are currently being explored as the site could be privately run, run by a housing association or Council run. Funding will be available from the Council and there are opportunities for grant funding from the Homes and Communities Agency.

Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site.

It is not proposed that Cowslip Way and Drumhead Road are connected and opened for vehicular traffic.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall...
Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
We are totally opposed to this suggestion and appalled that this development is being considered in the middle of a housing estate. We appreciate that Gypsy and Travellers need somewhere to live.

The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted. The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
Title: Miss  First Name: Michelle  Last Name: Cocker  Organisation: 

Site/location: 3. Cabbage Hall Fields

Modification

1: Evidence why available/suitable/achievable?
2: Agree with preferred site?
3: Comments on document

We are totally opposed to this suggestion and appalled that this development is being considered in the middle of a housing estate. We appreciate that Gypsy and Travellers need somewhere to live.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared?
5(2): Not justified?
5(3): Not effective?
5(4): Not consistent with national policy?
6: Reasons not legally compliant/unsound
7: Necessary changes

8: Participate in examination?
9: Reason participation necessary

Councils response

The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted. The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
We are totally opposed to this suggestion and appalled that this development is being considered in the middle of a housing estate. We appreciate that Gypsy and Travellers need somewhere to live.

The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
I am writing with concern regarding a permanent Gypsy/Traveller site being built on Cabbage Hall Fields. We have just recently moved and mortgaged our home and to hear that you wish to build a Traveller site behind/close to our property has upset us dearly, it will effect the value and sell-ability of our property. Our road is quiet and I can’t imagine what this development might do. We aren’t going to agree with the decision. I know my neighbours feel the same. It will affect insurances. The area is not suitable, with houses so close by if you are paying the amounts which have been quoted, the site needs to be away from peoples homes. If the site is for the Gypsies on Hut Lane why not agree to disagree, they have been there for five years. You have land all over. If you want to put things on the land how about a playground for the children that already live here. That’s what Chorley needs, you go to Preston, Morecambe and Southport, they have fantastic parks/play areas.

The site is allocated for housing in the Chorley Local Plan 2012-2026, therefore the principle of development is accepted.
The Council considers that actual or perceived impact on property values is not a material planning consideration.
Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site.
It is not proposed that Cowslip Way and Drumhead Road are connected and open for vehicular traffic.
The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
I do not feel that it would be appropriate to provide a permanent site at Cabbage Hall Fields. I have lived in this area now for 20 years. The area is quiet, calm, clean and houses a lot of old people, also a lot of young families with young children.

I feel that this 'proposal' would cause a major disturbance to this area and I feel that it is completely inappropriate to even consider this kind of site in these two areas. I feel it would make the area noisy, disruptive and I am completely against it in every single way! I do not want to have to live with such a major disruption. I suffer from anxiety and depression and I feel this would make my life even harder than it is now to have to put up with this annoyance.

I am sure there are many other sights within Chorley and its surrounding areas which are remote where you could provide a site.

I am deeply appalled that you are even considering a site within this community where I live. So NO! I do not approve!

Objection noted. The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
We are strongly against this proposal. This would no doubt affect the residents and the value of their properties, which is extremely unfair.

This simply cannot happen.

Our preferred site is also Cowling Farm.

Support for Cowling farm noted.
The Council considers that actual or perceived impact on property values is not a material planning consideration.
This site is allocated for housing in the emerging Chorley Local Plan 2012-26.
The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
Title: Mr  First Name: Phil  Last Name: Harris  Organisation: 

Site/location  3. Cabbage Hall Fields

Paragraph/section  

Modification 

1: Evidence why available/ suitable/ achievable? 

2: Agree with preferred site? 

3: Comments on document  We are strongly against this proposal. This would no doubt affect the residents and the value of their properties, which is extremely unfair. 

This simply cannot happen. 

Our preferred site is also Cowling Farm.

4(1): Legally compliant? 

4(2): Sound? 

5(1): Not positively prepared?  □ 

5(2): Not justified?  □ 

5(3): Not effective?  □ 

5(4): Not consistent with national policy?  □ 

6: Reasons not legally compliant/unsound 

7: Necessary changes 

8: Participate in examination? 

9: Reason participation necessary 

Councils response  Support for Cowling Farm noted. 

The Council considers that actual or perceived impact on property values is not a material planning consideration. 

This site is allocated for housing in the emerging Chorley Local Plan 2012-26. 

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
3. Cabbage Hall Fields

As 'Cabbage Halls Field' is directly behind my property I feel strongly against a Traveller site there. It is very quiet here. I feel if a site was given permission that would change dramatically. Also lowering the cost of house prices thus effecting economy in the area.

I feel the Council isn’t thinking about views of those in the area this plan could affect and the impact it will have.

I DO NOT feel having a permanent site on 'Cabbage Hall Fields' is appropriate at all.

The Council considers that actual or perceived impact on property values is not a material planning consideration.

Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
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<td>Paragraph/section</td>
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<td>1: Evidence why available/suitable/achievable?</td>
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<tr>
<td>2: Agree with preferred site?</td>
<td>Yes</td>
</tr>
<tr>
<td>3: Comments on document</td>
<td>I don't agree that Cabbage Hall Fields is a suitable location. The site would not be in keeping with the residential area with which it immediately adjoins. On a personal level this worries me as to the detrimental effect of house prices. The preferred option of Cowling Farm being larger and more rural can accommodate it better</td>
</tr>
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<td>4(1): Legally compliant?</td>
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**Councils response**

The Council considers that actual or perceived impact on property values is not a material planning consideration.

Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.

Preference for the Cowling Farm site is noted.
I strongly object to the siting of a Traveller park on Cabbage Hall Fields on the grounds of extra traffic. This would seriously devalue properties and make them impossible to sell.

The Council considers that actual or perceived impact on property values is not a material planning consideration.

Lancashire County Council has no highway objections to this proposal and has no concerns for the capacity of Millennium Way/Drumhead Road to cope with the proposed site.

It is not proposed that Cowslip Way and Drumhead Road are connected and open for vehicular traffic.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.

Preference for the Cowling Farm site is noted.
We wish to object strongly. Having had past experience of Travellers who set up camp on a business park and staff could not park let alone be able to conduct business i.e. customers visiting, deliveries or collections being made to the premises.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.

Lancashire County Council Highways have stated 'there are no major highway implications for the location of this site; as such, there would be no objection to the proposal.'
I would like to make known my strong objection to a Gypsy site being on Cabbage Hall Fields.

The Council has discounted this site as a Gypsy and Traveller site because Cabbage Hall Fields has topography in terms of steep changes in level which would mean that five plus pitches could not be accommodated there. Therefore it is not proposed for allocation.
Title: Mr  
First Name: Lawrence  
Last Name: Turner  
Organisation:  

<table>
<thead>
<tr>
<th>Site/location</th>
<th>4. Westhoughton Road</th>
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<tbody>
<tr>
<td>Paragraph/section</td>
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<td>3: Comments on document</td>
<td>The proposal takes no account that this site is on Green Belt, policy quotes 'The Framework indicates the Government attaches great importance to Green Belts.' This site is situated on the A6 with not enough space for 5 pitches let alone space for parking and turning of vehicles, as you state the site area required is estimated at 0.4 hectares but on your plan it is 0.39 hectares and I believe your OS sheet is out of date and the site would be less than you state. With regards to contamination it is believed that this site has been used for storing various chemicals and materials by Lancashire County Council. It is also believed this site was previously used for release of gas from the mines nearby. With reference to availability this site is used regularly by Lancashire County Council and Highways, as we speak it is full of road chippings therefore it would not be available now. It is not a suitable site to have children on not withstanding previous concerns of the A6 and contamination issues but to the rear of the site is an approximate 20ft drop to the canal. Utilities to this site are non existent, where would fresh water and electricity come from? I feel there are other sites more suited than this one both in size and safety for all families concerned.</td>
</tr>
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<td>See response to question 3.</td>
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Councillors response: Reference is made to Green Belt policy in the document as it is a key reason why this is not a proposed site. Westhoughton Road has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. No detailed assessment of precise hectarage nor potential design layout has been undertaken as this is not a proposed site. As stated in the report there are several historic land uses that could potentially have
caused ground contamination. However, as the risk of contamination is unknown
detailed site investigation would be required in advance of any development.
The Environment Agency has confirmed this site is located on top of a historic tip and
would require an appropriate ground investigation report that will assess any potential
impacts on controlled waters. The Coal Authority submitted representations
requesting some changes to be made to the document. They identified that this site
has been subject to coal mining which has left a legacy of unstable land which will
need to be assessed and appropriate remedial works undertaken prior to site
occupation. The requested additional text has been added to the site assessment.
The Council is aware that Lancashire County Council use this land for storage and that
there may be issues around site ownership. Only if the site was taken forward would
issues around safety, services and utilities be explored further.
Title: Mr  
First Name: Michael  
Last Name: Eubank  
Organisation:

Site/location  
4. Westhoughton Road

Paragraph/section

Modification

1: Evidence why available/suitable/achievable?  
No

2: Agree with preferred site?  
No

3: Comments on document

The proposal takes no account that this site is on Green Belt, policy quotes 'The Framework indicates the Government attaches great importance to Green Belts.'

This site is situated on the A6 with not enough space for 5 pitches let alone space for parking and turning of vehicles, as you state the site area required is estimated at 0.4 hectares but on your plan it is 0.39 hectares and I believe your OS sheet is out of date and the site would be less than you state.

With regards to contamination it is believed that this site has been used for storing various chemicals and materials by Lancashire County Council. It is also believed this site was previously used for release of gas from the mines nearby.

With reference to availability this site is used regularly by Lancashire County Council and Highways, as we speak it is full of road chippings therefore it would not be available now. It is not a suitable site to have children on not withstanding previous concerns of the A6 and contamination issues but to the rear of the site is an approximate 20ft drop to the canal. Utilities to this site are non existent, where would fresh water and electricity come from?

I feel there are other sites more suited than this one both in size and safety for all families concerned.

4(1): Legally compliant?  
No

4(2): Sound?  
No

5(1): Not positively prepared?  
No

5(2): Not justified?  
No

5(3): Not effective?  
No

5(4): Not consistent with national policy?  
Yes

6: Reasons not legally compliant/unsound  
See response to question 3.

7: Necessary changes

8: Participate in examination?  
No

9: Reason participation necessary

Councils response

Reference is made to Green Belt policy in the document as it is a key reason why this is not a proposed site. Westhoughton Road has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

No detailed assessment of precise hectarage nor potential design layout has been undertaken as this is not a proposed site.

As stated in the report there are several historic land uses that could potentially have
caused ground contamination. However, as the risk of contamination is unknown detailed site investigation would be required in advance of any development. The Environment Agency has confirmed this site is located on top of a historic tip and would require an appropriate ground investigation report that will assess any potential impacts on controlled waters. The Coal Authority submitted representations requesting some changes to be made to the document. They identified that this site has been subject to coal mining which has left a legacy of unstable land which will need to be assessed and appropriate remedial works undertaken prior to site occupation. The requested additional text has been added to the site assessment. The Council is aware that Lancashire County Council use this land for storage and that there may be issues around site ownership. Only if the site was taken forward would issues around safety, services and utilities be explored further.
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<td>1: Evidence why available/suitable/achievable?</td>
<td>Site 4: Land off Westhoughton Road, Heath Charnock, is located on top of a historic landfill named Westhoughton Road, therefore any planning application submitted for development on this site, if selected, should be accompanied by an appropriate ground investigation report that will assess any potential impacts on controlled waters.</td>
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<td>7: Necessary changes</td>
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<td>8: Participate in examination?</td>
<td></td>
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<td>9: Reason participation necessary</td>
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</table>

**Councils response**

Detailed site and ground investigation works would be undertaken as part of any proposed allocation/planning application and appropriate mitigation measures undertaken.

The Environment Agency has confirmed this site is located on top of a historic tip and would require an appropriate ground investigation report that will assess any potential impacts on controlled waters. The Coal Authority submitted representations requesting some changes to be made to the document. They identified that this site has been subject to coal mining which has left a legacy of unstable land which will need to be assessed and appropriate remedial works undertaken prior to site occupation. The requested additional text has been added to the site assessment. Reference is made to Green Belt policy in the document as it is a key reason why this is not a proposed site. Westhoughton Road has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.
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<tr>
<th>Rep No</th>
<th>GT146</th>
<th>Client ID</th>
<th>128</th>
</tr>
</thead>
</table>

**Title:** Mr  
**First Name:** Edward  
**Last Name:** Burton  
**Organisation:**

**Site/location**: 4. Westhoughton Road

**Paragraph/section**:  
**Modification**

1: Evidence why available/ suitable/ achievable?  
2: Agree with preferred site? Yes

3: Comments on document

4(1): Legally compliant? No
4(2): Sound? No
5(1): Not positively prepared? 
5(2): Not justified? ✓
5(3): Not effective? ✓
5(4): Not consistent with national policy? ✓

6: Reasons not legally compliant/unsound

The land is registered as Green Belt. Why is this land able to be taken off the Green Belt classification when other land owners around have been refused. The land is unsuitable as the A6 is a major road which becomes gridlocked when there is any kind of incident on the M61. With the canal at one side and the A6 on the other the site is unsafe for young children. The area is a quiet residential area with only five properties, this development would radically alter the area.

7: Necessary changes

8: Participate in examination? No

9: Reason participation necessary

**Councils response**

Reference is made to Green Belt policy in the document as it is a key reason why this is not a proposed site. Westhoughton Road has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

Lancashire County Council has commented for the proposal to be acceptable the following measures will be required; extension of the existing footways on the west side of the road past the site access to the existing layby; speed reduction measures either through road markings and coloured surfacing or extension of the 40mph speed restriction past the site towards north and measures to allow safe crossing of the road.
Four of the eight alternative sites have been subjected to coal mining which has left a legacy. Sites 4 (recorded mine entry); Site 5, 8 and 9 (probable shallow coal mining).

Whilst these coal mining hazards would not deem these sites to be automatically unsuitable; should the preferred site not be taken forward and an alternative site chosen, these risks should be identified as part of each of the sites constraints.

Whilst it has been acknowledged that Site 4 does not identify that the site contains former coal mine workings, it does highlight that a detailed site investigation would be required in advance of any development. The LPA must ensure that these site investigations include locating the mine entry and provide a remediation strategy on how the mine entry will be treated.

Change requested – Table 1, Site 4 “Policy 8 – A detailed site investigation is required under criterion (c) as there is potential ground contamination due to the historic land uses on the site." Add the following text "This site also has recorded coal mining legacy and the site investigation will need to locate and assess the recorded mine entry to establish its current condition and the remedial works required to ensure that any development activity within the vicinity will not be at risk from this existing feature."

Change requested – Site Information and Site Appraisal (Site 4 Land off Westhoughton Road, Heath Charnock) -Contamination: "Risk from contamination is unknown - detailed site investigation would be required in advance of any development." Add the following text "This site has a recorded mine entry, the current condition is unknown. If this site were to be developed then a site investigation should include the need to locate and assess the recorded mine entry to establish its current condition and the remedial works required to ensure that any development activity within the vicinity will not be at risk from this existing feature."

Reason - In accordance with local planning policy BNE7 of the Chorley Local Plan and the NPPF guidance (paras. 109, 120, 121 and 166), this would ensure that the policy that allocates potential development sites identify the necessary remediation or stabilisation prior to development.
8: Participate in examination?

9: Reason participation necessary

Councils response

Comments Noted. Amend Table 1, Site 4 Policy 8 to add text "This site also has recorded coal mining legacy and the site investigation will need to locate and assess the recorded mine entry to establish its current condition and the remedial works required to ensure that any development activity within the vicinity will not be at risk from this existing feature."

Amend Contamination section to add "This site has a recorded mine entry, the current condition is unknown. If this site were to be developed then a site investigation should include the need to locate and assess the recorded mine entry to establish its current condition and the remedial works required to ensure that any development activity within the vicinity will not be at risk from this existing feature."
Title: Mr
First Name: Brian
Last Name: Allman
Organisation: Ramblers Association

Site/location
4. Westhoughton Road

Paragraph/section
Modification
1: Evidence why available/suitable/achievable?
2: Agree with preferred site?
3: Comments on document
This is OK from Rambling point of view, but Lancashire County Council have traffic safety reservations.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes

8: Participate in examination?
9: Reason participation necessary
Councils response
Support noted.
Lancashire County Council Highways have stated that for the proposal to be acceptable, the following measures would be required, extension of the existing footway on the west side of the road past the site access to the existing layby; speed reduction measures either through road markings and coloured surfacing or extension of the 40mph speed limit restriction past the site towards the north and measures to allow safe crossing of the road.
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<td>1: Evidence why available/suitable/achievable?</td>
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<tr>
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<td>Yes</td>
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<td>3: Comments on document</td>
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</table>

Currently this is a quiet neighbourhood, with only five properties on this section of road. Doubling, or more, of this number will radically alter the area.

It has been established that this is an inappropriate development in the Green Belt. In order therefore for it to proceed, this area will have to be reclassified. What will cease to be Green Belt? Just this plot of land, or a wider area? It seems unjust if the Council can get an area of Green Belt lifted on land which it owns, or for one of its projects, when this action is not available to other landowners. If an area can be classified as brownfield, when is this valid from? Any point in history, or from when the Green Belt was introduced? The foundry was demolished before the adjacent houses were built, over 70 years ago.

Proposed site is on a narrow plot between a major road (A6), and the Leeds and Liverpool canal. This is unsuitable for any families with young children, unless it is securely fenced, particularly as at this point there is a drop down to the canal.

Normally the Canal and River Trust allow mooring where there is a residential property. Would mooring be allowed alongside this camp? If mooring, whether authorised or unauthorised, takes place then the number of families accommodated may well increase, if the boats are residential, thus increasing the load on the local infrastructure.

Currently Adlington Canoe Club have a building on site, and it is unclear whether this is still in use. Development of the site will preclude its use in the future.

The document states that the land was 'last used' by Lancashire County Council. This should read 'currently used'. The photographs show an empty site, but if they were taken today, a large quantity of chippings would be visible. Lancashire County Council use this land when they are carrying out road works in the area. If they had to find an alternative site, and this was further away, then this would add to costs, increase traffic, pollution etc.

Given that the site is above canal level, care will have to be taken to prevent any pollution.

The two houses on that side of the road are not on mains drainage. There will be a need to check that the sewer serving the other three properties is capable of supporting the additional load. Their mains drainage runs to the rear of the three houses. The electricity supply may also need upgrading. Currently the gas main stops short of the site.

According to the Coal Authority, there is a mineshaft in the area. We have had two possible locations for this, but when building works were undertaken no sign of it was found. It is possible therefore that it is on the land that was short listed for the Traveller's site. A local resident reports that before the land was flattened, there was a 'tunnel' on the site, which a mine worker said was full of gas. There was also a
quantity of asbestos sheeting on site at that time. A comprehensive study of the land should take place before any final decision is taken.

The failure to inform local residents of the sites on the shortlist, brings into question the viability of the whole consultation process. The Council was able to send out information to a very large number of local organisations, but residents had to find out about it via the local press, if they bought the Chorley Guardian, or via word of mouth from other concerned residents.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

Reference is made to Green Belt policy in the document as it is a key reason why this is not a proposed site. Westhoughton Road has been considered and discounted because it falls within the Green Belt and there are no ‘exceptional’ circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

The Green Belt was designated in the borough of Chorley in 1997. The land is considered brownfield because it is previously developed land. This is land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure (Source: NPPF Annex 2 page 55).

The Council is aware that Lancashire County Council use this land for storage and that there may be issues around site ownership. Only if the site was taken forward would issues around safety, services and utilities be explored further.

As stated in the report there are several historic land uses that could potentially have caused ground contamination. The Environment Agency has confirmed this site is located on top of a historic tip and would require an appropriate ground investigation report that will assess any potential impacts on controlled waters. The Coal Authority submitted representations requesting some changes to be made to the document. They identified that this site has been subject to coal mining which has left a legacy of unstable land which will need to be assessed and appropriate remedial works undertaken prior to site occupation. The requested additional text has been added to the site assessment.

Adlington Canoe Club do use the storage building located within the northern boundary of the site for their activities and have a separate access to this facility. The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups
received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of sites received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.
Mr Christopher Roberts

4. Westhoughton Road

1: Evidence why available/suitable/achievable?
Yes

3: Comments on document
a) The land is in the Green Belt area and previous plans to develop in this area have been recently rejected.
b) The access to this land is off the main A6 road, and this constitutes a safety issue.
c) This site is currently used by Lancashire County Council as a storage depot for materials used in road re-surfacing.
d) This is not a safe site for families with young children as it is bordered by the canal and the A6.

4(1): Legally compliant?
4(2): Sound?

5(1): Not positively prepared? No
5(2): Not justified? No
5(3): Not effective? No
5(4): Not consistent with national policy? No

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination? No

9: Reason participation necessary

Councils response
Reference is made to Green Belt policy in the document as it is a key reason why this is not a proposed site. Westhoughton Road has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt.

The Council is aware that Lancashire County Council use this land for storage and that there may be issues around site ownership. Only if the site was taken forward would issues around safety, services and utilities be explored further.

Lancashire County Council Highways has commented for the proposal to be acceptable the following measures will be required; extension of the existing footway on the west side of the road past the site access to the existing layby; speed reduction measures either through road markings and coloured surfacing or extension of the 40mph speed restriction past the site towards north and measures to allow safe crossing of the road.
Four of the eight alternative sites have been subjected to coal mining which has left a legacy. Sites 4 (recorded mine entry); Site 5, 8 and 9 (probable shallow coal mining). Whilst these coal mining hazards would not deem these sites to be automatically unsuitable; should the preferred site not be taken forward and an alternative site chosen, these risks should be identified as part of each of the sites constraints.

In relation to Site 5, there is no indication that site remediation will be required even though our information confirms that coal mining legacy may have led to ground instability.

Change requested – Site Information and Site Appraisal (Site 5 Land at Ackhurst Road, Chorley) - Contamination: "The site is historically classified as part of the sewage works. There is a potential for ground contamination." Add the following text "Former coal mining activity has left a legacy of unstable land which will need to be assessed and appropriate remedial works undertaken prior to site occupation."

Reason - In accordance with local planning policy BNE7 of the Chorley Local Plan and the NPPF guidance (paras. 109, 120, 121 and 166), this would ensure that the policy that allocates potential development sites identify the necessary remediation or stabilisation prior to development.

Comments Noted . Amend text "The Coal Authority records indicate that there was probable shallow coal mining activity on this site. If so, this unstable land which will need to be assessed and appropriate remedial works undertaken prior to site occupation."
This would seem best from Ramblers point of view. Although Common Bank Lane is Chorley Footpath 8, it is a metalled road, and (as the report says) it is safer than the busy Ackhurst Road. So it would suit us to have this as the best option.

Support Noted. Land at Ackhurst Road is an existing car park, serving adjacent employment uses and is leased from the Council on a long-term basis. Its allocation would require the legal issues to be addressed and would cause significant parking problems for the business that currently uses the land for parking and would potentially result in parking issues in the local area. Therefore, it has not been taken forward as a proposed allocation for a gypsy and traveller site.
We wish to object strongly. Having had past experience of Travellers who set up camp on a business park and staff could not park let alone be able to conduct business i.e. customers visiting, deliveries or collections being made to the premises.

Lancashire County Council Highways have stated 'there are no major highway implications for the location of this site; as such, there would be no objection to the proposal.'

Land at Ackhurst Road is an existing car park, serving adjacent employment uses and is leased from the Council on a long-term basis. Its allocation would require the legal issues to be addressed and would cause significant parking problems for the business that currently uses the land for parking and would potentially result in parking issues in the local area. Therefore, it has not been taken forward as a proposed allocation for a gypsy and traveller site.
The above site and indeed any site that may impact on the strategic road network would need to be agreed with the Agency as part of the planning process. We would wish to place conditions on any such application to protect the integrity and stability of the strategic road network.
I would like to object to the site being considered for use as a permanent Gypsy and Traveller site. The land in question is in close proximity to my property and other existing residential properties and will likely have a severe effect on my ability to sell or rent out my house. Property value will be adversely affected.

There are already problems with anti-social behaviour on Northgate and I believe the introduction of a Traveller community would only make matters worse, and potentially cause friction with the existing community due to being in such close proximity.

I believe access to Northgate Drive is also unsuitable for the movement of large vehicles and caravans on a regular basis. The road is narrow and regularly congested with parked vehicles, making access difficult. This would also be dangerous as there are large numbers of children that play on Northgate and the introduction of large vehicles on these roads will pose a danger to those children.

The proposed site is the only greenspace in the vicinity of Northgate Drive and the loss of this space would have a detrimental effect on the existing residents. The space is used by local children for play and by other residents for dog walking etc.

The Council considers that actual or perceived impact on property values is not a material planning consideration in the allocation of sites for development. Community cohesion issues will be considered as part of any allocation and the Council is liaising with the police on further detailed site assessment work. The proposed access is from Chorley North Industrial Estate. Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans. This site is not identified as greenspace in the emerging Chorley Local Plan 2012-26, rather it is a housing allocation. The adjacent open space is not allocated as open space in the Chorley Local Plan but it
is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value.

The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
I must strongly object to this proposal as I have just recently moved to Coltsfoot Drive with my young family so I can raise my children in a quiet, peaceful and friendly area.

I have experienced living near a Travellers site in Blackpool and if I had been aware this proposal was being considered I would have had second thoughts about moving to this area.

I have spoken to other neighbours and they are all against this, and if this area is put forward I will be contacting the MP to further our protests.

Objection noted. The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
Title: Mr  
First Name: B M  
Last Name: Grimshaw  
Organisation:  

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<thead>
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<th>Site/location</th>
<th>6. Northgate Drive</th>
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<tbody>
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<td>Paragraph/section</td>
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<tr>
<td>Modification</td>
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<tr>
<td>1: Evidence why available/suitable/achievable?</td>
<td>I think this goes without saying that this proposal causes me great concern as a home owner. It is my opinion that this site will reduce the value of my property. If in the future I decide to sell my house I believe it will also dissuade potential buyers. Therefore I strongly object to this proposal.</td>
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<td>2: Agree with preferred site?</td>
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<td>3: Comments on document</td>
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<td></td>
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<tr>
<td>Councils response</td>
<td>The Council considers that actual or perceived impact on property values is not a material planning consideration in the allocation of sites for development. The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).</td>
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</table>
Site/location
6. Northgate Drive

Paragraph/section
Modification
1: Evidence why available/suitable/achievable?
2: Agree with preferred site?
3: Comments on document
This is the only area of greenspace and acts as a buffer zone between Northgate and the motorway. The road is very narrow with cars parked on either side and would be very difficult for large vehicles to safely access the area. As it is a major route for children to access St Joseph's primary school this would cause road safety concerns.

4(1): Legally compliant?
4(2): Sound?

5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response
Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans. This site is not identified as greenspace in the emerging Chorley Local Plan 2012-26, rather it is a housing allocation. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value. The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
I wish to express my concerns about the proposal to put a Gypsy and Traveller site on the land adjacent to Northgate Drive. I feel the site is inappropriate. Access to the site will be through the estate roads, through a busy residential area with cars parked on both sides. This would make it virtually impossible for large vehicles to move safely. Children play in the area and make their way to school on these roads. The potential for accidents seems obvious. I urge you to reconsider this option.

Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans. This site is allocated for housing in the emerging Chorley Local Plan 2012-26. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value. The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
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Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans. This site is allocated for housing in the emerging Chorley Local Plan 2012-26. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value. The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
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Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans. This site is allocated for housing in the emerging Chorley Local Plan 2012-26. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value.

The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
I wish to express my concerns about the proposal to put a Gypsy and Traveller site on the land adjacent to Northgate Drive. I feel the site is inappropriate. Access to the site will be through the estate roads, through a busy residential area with cars parked on both sides. This would make it virtually impossible for large vehicles to move safely. Children play in the area and make their way to school on these roads. The potential for accidents seems obvious. I urge you to reconsider this option.

Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans.

This site is allocated for housing in the emerging Chorley Local Plan 2012-26. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value.

The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
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Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans. This site is allocated for housing in the emerging Chorley Local Plan 2012-26. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value. The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
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I write to advise you that we cannot envisage Northgate Drive as an agreeable location for Travellers be it as permanent or overnight resting places that are sought. Please be assured that I have taken into consideration that Travellers may require accommodating by provision of a new area to stay however this site is not in our opinion suitable for this purpose.

Firstly, our cul-de-sac is a child friendly area, all the neighbourhood children play outside on the pavements together running from garden to garden, all the neighbours know each other. Encouraging strangers into the area who frequently come and go would seriously impact on the safe environment that has been established. Furthermore, the introduction of Travellers to this immediate area would bring increased and unwelcome volumes of traffic to the narrow winding roads of our residential estate, again making the situation more hazardous for people crossing roads/playing outside etc.

Further concerns arise when the impact on the environment is considered i.e. where would all the waste/rubbish created by the Travellers be left? Then in regards to education if a proposed site were to be made permanent this would place an even greater strain on the already overcrowded and under resourced local schools, this would be unfair on our children. In addition to these facts and from an economic point of view the property value of the immediate area would reduce, this would be detrimental to homeowners.

From a personal point of view, my partner and I have recently moved to this quiet area for the peace and tranquillity. Our home is ideally placed for us with open fields to the rear and a discreet cul-de-sac to the front, due to us having two children and expecting a new baby. In addition I work night shifts and sleep during the day, meaning my wife is left in the house with young children at night. If Travellers were to move into the back of our garden if would leave my wife feeling very vulnerable with strangers looking into our house and insecure in her own home. Furthermore I would not be able to sleep in the day with the constant noise of people driving backwards and forwards from a site next to my home.

In conclusion if the area must be developed then making the site into secure play areas/parks for our local neighbourhood would be such a valuable asset to the area and would assist in stopping the children from playing on the roads, obviously with the far side of the site having hazardous industrial areas then suitable gates or railings would need to be installed. However, this would reassure us as local residents that our immediate area remains safe for our families to enjoy the outdoors.

I hope that our opinion is duly noted and considered before any decision is made with regards to the above matter. I do understand that the preferred site of Cowling Farm has been suggested for Travellers to avail themselves of however I do feel very strongly against the proposed site of Northgate Drive therefore thought it my duty to respond in writing.
Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans. This site is allocated for housing in the emerging Chorley Local Plan 2012-26. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value. The Council considers that actual or perceived impact on property values is not a material planning consideration.

Lancashire County Council Education Department contributed to the process of allocation for housing and did not raise any such issues. The existing Traveller community children already avail of school places in Chorley Borough. Any application for development on the site would have to satisfy Local Plan Policy BNE1: Design Criteria for New Development which protects general amenity and covers noise and landscaping/tree issues. The proposed allocation for housing has already been considered sound. As with any other development, the Council will liaise with the police authority in order to arrive at an appropriate design and layout and ensure that the site is fit for purpose. Measures will be implemented in order to help prevent crime and promote community safety.

The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
I wish to express my concerns regarding the proposal to put a Gypsy and Traveller site on the land adjacent to Northgate Drive.

I feel that the site would not be suitable as it is only a single road with cars parked on both sides of the road which is a very busy road to start with. Having big caravans moving on a narrow strip of land would cause havoc and with so many children on the estate I truly believe it would not be safe. It is a very dangerous road seeing as it has been put on a 20mph limit which is totally ignored. The children only have that bit of spare land to play on which they do as if they had to go to Harpers Rec it means crossing a major road (Harpers Lane). They cannot play in the street due to lots of traffic using it as a short cut to get to the Thornhill estate. I think it would be safer to let children play there instead of putting their safety at risk.

I urge you to reconsider this option for the safety of all on Northgate Drive.
<table>
<thead>
<tr>
<th>Rep No</th>
<th>Client ID</th>
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<tr>
<td>GT124</td>
<td>109</td>
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I wish to express my concerns of the possibility of a Gypsy and Traveller site on the land adjacent to Northgate Drive. I am concerned that access to this site would be through a busy road with cars parked on either side, therefore large vehicles would struggle to travel on this road safely.

I feel the safety of my children would be a concern when travelling to and from school as the road/area will have more traffic potentially causing accidents. This land in particular is popular with all the children on Northgate Drive and the rest of the estate as it is the safest area for them to play due to the closest recreation playground being across a busy main road.

For the safety of all the residents on Northgate Drive I urge you to reconsider this option and consider my concerns put forward to you.
We would like to express our views on this proposed site. We think that it is totally wrong to place caravans on this road. This is a major thoroughfare for all traffic now who use it to get from the Harpers Lane area to Botany Bay and it is used by all heavy lorries, vans, cars etc. constantly. The sharp bend at the bottom of the Northgate is extremely hazardous already with traffic whizzing round the corner so the last thing we need is extra cars and caravans there.

The proposed site is far too near to the houses and flats on the road. The Housing Association have just spent millions on the flats which now look lovely with nice gardens etc. and the last thing they need is a caravan site within yards of their homes.

The site is also used by all the utility services to park their vehicles and portacabins on when they are doing work on this estate. Without this site there would be nowhere around here to accommodate them.

The families in this area would think more highly of this Council if they used part of the site to make a small play area for the children of this estate who have nowhere to play. The kids are always on the road playing football, riding scooters etc. which is dangerous for them with the amount of traffic. Other estates in Chorley seem to have play areas to keep them safe so why can't the kids round here have one.

All in all the site is totally unsuitable for a caravan site which needs to be in more open country and we hope you take note of all the residents views on this.

Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans.

This site is allocated for housing in the emerging Chorley Local Plan 2012-26. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2.
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I have just been informed that the Council are considering this site for Gypsy and Traveller people. Do they pay community charge?

I must admit that in the short space of time that this has been known, I have never known such anger and disappointment amongst residents. I have lived in Northgate Drive 59 years and I know as fact that various people over the years have tried to get the land into some sort of play area for the many children around here. It is only last year that all the flats at the bottom of Northgate Drive had hundreds of thousands of pounds spent on them, also the housing association along with the Council moved on problem residents to the relief of everyone. Now I am proud of the area as it is a much better and nicer place to live.

I can see nothing but problems with this proposed idea, fly tipping, not enough room, mature trees cut down. Anyway the ball is rolling with the Northgate residents, we await further news before we have a mass meeting at St Joseph's Hall.

This site is allocated for housing in the emerging Chorley Local Plan 2012-26. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value.

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I wish to inform you that I do strongly object to this site being used for this purpose for the following reasons:

1. Cars are parked on opposite sides of the road already, any extra traffic would cause more congestion and risk injury to pedestrians and children who walk to and from St Peter’s and St Joseph’s schools.

2. This land is the only greenspace left in the area, the trees which serve to block out the noise and pollution of the adjacent motorway would have to be sacrificed in order to gain access to the land.

3. I think that it would, for the above reasons, devalue house prices.

4. I believe that there is already a problem with the sewage, it is already at full capacity with existing usage.

Therefore I would be very relieved and grateful if the land could be removed from the proposed options.

Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans.

This site is not identified as greenspace in the emerging Chorley Local Plan 2012-26, rather it is a housing allocation. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value.

The Council considers that actual or perceived impact on property values is not a
material planning consideration.
Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria f) protects important natural habitats and landscape features such as mature trees and hedgerows. Policy BNE9: - Trees also protects trees.
United Utilities has indicated for housing use there are some issues in terms of overloading and some issues with flooding in Merefield/Long Copse. Any input into this system will affect Botany Bay Ww pumping station and this will have to be considered when establishing the impact upon the station.
The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
I am writing as a resident to object to the proposed possible site of Northgate Drive as a permanent site for the Travelling community. I object on the grounds of health and safety.

1. The road is narrow and when cars are parked it would be dangerous for the children who use the road to walk to school if a large vehicle was trying to pass. It is already difficult for traffic passing.

2. For the Travellers as its too near a very busy motorway, the noise and possible fumes from the vehicles could cause a health problem especially to children.

Also it is the only green patch of land on Northgate Drive for children to play on and for myself and other residents to enjoy.

I am also very surprised that the residents of Northgate Drive have not been informed by yourselves about the preferred options. I would have appreciated a letter. Neither was normal protocol observed by posting notices in the area.

I am however pleased that the Council is looking to provide a permanent site for Travellers.

I only found out by a third party today.

Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans. This site is not identified as greenspace in the emerging Chorley Local Plan 2012-26, rather it is a housing allocation. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport
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When considering applications for planning permission the Council will take into account the criteria set out in Local Plan 2012-2026 - Policy BNE1: Design criteria for new development.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of North gate Road received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
<table>
<thead>
<tr>
<th>Site/location</th>
<th>6. Northgate Drive</th>
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<tr>
<td>Paragraph/section</td>
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<tr>
<td>Modification</td>
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<tr>
<td>1: Evidence why available/suitable/achievable?</td>
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<tr>
<td>2: Agree with preferred site?</td>
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<tr>
<td>3: Comments on document</td>
<td>Petition in objection to this site - signed by 187 people.</td>
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<td>4: Legally compliant?</td>
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<td>5(1): Not positively prepared?</td>
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<td>5(2): Not justified?</td>
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<td>7: Necessary changes</td>
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I am writing in response to the above, which I became aware of only as a result of reading an article today in this week’s Chorley Guardian (15 July 2014 edition).

CCH wishes to object to any proposal to site permanent Traveller pitches at Northgate Drive, Chorley as this is in close proximity to the Association’s housing stock in this area.

Please note that, as a major stock owning landlord, we would appreciate it if we could be consulted directly on proposals that affect our housing stock.

Chorley Community Housing are on our database and were consulted about this consultation on 5 June 2014.

The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).

This site is allocated for housing in the emerging Chorley Local Plan 2012-26.
Title: Mr  First Name: Brian  Last Name: Allman  Organisation: Ramblers Association

Site/location  6. Northgate Drive

Paragraph/section

Modification

1: Evidence why available/suitable/achievable?
2: Agree with preferred site?
3: Comments on document

This affects Chorley Footpath 25.

4(1): Legally compliant?
4(2): Sound?

5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?
9: Reason participation necessary

Councils response

The site is allocated for housing in the emerging Local Plan. Policy ST1 covers new provision or improvement of footpaths and their associated facilities in existing networks and new developments. Proposals should provide for the retention or appropriate diversion of existing footpaths.

The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
I would like to make known my strong objection to a Gypsy site being on Northgate or Cabbage Hall Fields Chorley.

Objection noted. The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
We would like to object against the proposed site. These are the reasons for our objections:

Environmental - The road at the bottom of Northgate Drive is currently heavily used for traffic. This becomes increasingly heavy in the evening and it is hazardous to drive around as parking is a particular problem. The addition of extra traffic being introduced would deem the area even harder to navigate and parking spaces would become a premium. Currently children do play around the estate and this would make this more of a no go area. We have constant problems with speeding even though a 20mph limit has been introduced.

Further environmental impact. Currently the area at the bottom of Northgate Drive has a large vista of trees. This goes towards lessening the impact of noise from the adjacent M61 motorway as well as providing an attractive vista whilst approaching the estate. If a permanent camp were to be situated there, then noise would increase as well established trees and bushes were knocked down. Not only would this make the area unattractive but noise would increase from both traffic, caravans and also from motorway noise. Would CBC be compensating houses for this inconvenience by wall insulation and extra glazing?

Further environmental impact. Extra drains etc. would have to be installed, making one of the only access roads onto the estate virtually impassable during such works. Already overcrowded roads and extra drains would make for further potential problems.

Issue over who owns the land. There has been a lot of speculation over who owns the land at the bottom of Northgate Drive after the motorway was built and effectively truncating previous roads. Would it be legal to build there?

Previous attempts to change the land. As a long standing resident of Northgate Drive, I have seen over the years previous attempts to change the land for the benefit of local residents. Such as suggested play areas or even allotments. Sadly this has never seen fruition for local residents due to lack of funding or other reasons. We are disappointed to find that local residents needs have not been fully explored.
Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans. The Council considers that actual or perceived impact on property values is not a material planning consideration. This site is allocated for housing in the emerging Chorley Local Plan 2012-26 and is owned by Chorley Council. Any application would have to satisfy Local Plan Policies BNE1:Design Criteria for New Development, protecting general amenity and covering noise and landscaping/tree issues. The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
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I understand that Northgate Drive and Cabbage Hall Fields could be potential sites to provide a permanent site for Travellers. As a resident of Coltsfoot Drive, I would not like either of these sites to be considered as the area is already quite built up and a low-cost residential area where families tend to set up house and I do not think that this would be suitable for Travellers or for the current residents of the area.

I would think that a more open space not near to any community should be considered and should be grateful if you would note my comments.

Allowing Travellers to occupy an area near Coltsfoot Drive would only result in problems for the current residents and the reduction of property values.

Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans.

The Council considers that actual or perceived impact on property values is not a material planning consideration.

This site is allocated for housing in the emerging Chorley Local Plan 2012-26. The adjacent open space is not allocated as open space in the Chorley Local Plan but it is an area of amenity green space that is protected in accordance with Policy HW2 (Protection of Existing Open Space, Sport and Recreational Facilities). The site was not assessed by the Open Space Study because it is below the 0.2 hectare threshold but is considered to provide amenity value.

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<th>Ms</th>
<th>First Name:</th>
<th>Justine</th>
<th>Last Name:</th>
<th>Makin</th>
<th>Organisation:</th>
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<td>Site/location</td>
<td>6. Northgate Drive</td>
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<td>1: Evidence why available/ suitable/ achievable?</td>
<td>I do not feel that it would be appropriate to provide a permanent site at Northgate Drive. I have lived in this area now for 20 years. The area is quiet, calm, clean and houses a lot of old people, also a lot of young families with young children.</td>
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<td>2: Agree with preferred site?</td>
<td>I feel that this 'proposal' would cause a major disturbance to this area and I feel that it is completely inappropriate to even consider this kind of site in these two areas. I feel it would make the area noisy, disruptive and I am completely against it in every single way! I do not want to have to live with such a major disruption. I suffer from anxiety and depression and I feel this would make my life even harder than it is now to have to put up with this annoyance.</td>
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<td>3: Comments on document</td>
<td>I am sure there are many other sights within Chorley and its surrounding areas which are remote where you could provide a site. I am deeply appalled that you are even considering a site within this community where I live. So NO! I do not approve!</td>
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<td>4(1): Legally compliant?</td>
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<td>7: Necessary changes</td>
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<td>9: Reason participation necessary</td>
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**Councils response**

Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans.

The Council considers that actual or perceived impact on property values is not a material planning consideration.

This site is allocated for housing in the emerging Chorley Local Plan 2012-26. The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
We are strongly against this proposal. This would no doubt affect the residents and the value of their properties, which is extremely unfair.

This simply cannot happen.

Our preferred site is also Cowling Farm.

Support and preference for the Cowling Farm site is noted.
The Council considers that actual or perceived impact on property values is not a material planning consideration.
Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building.
The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
Title: Mr  First Name: Phil  Last Name: Harris  Organisation:

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<td>9: Reason participation necessary</td>
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Councils response
Support and preference for the Cowling Farm site is noted. The Council considers that actual or perceived impact on property values is not a material planning consideration. Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building. The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
I strongly object to the siting of a Traveller park on Northgate Drive on the grounds of extra traffic. This would seriously devalue properties and make them impossible to sell.

Lancashire County Council has stated that it has no highways objections in principle provided measures can be taken to limit the use of the residential access by large vehicles and caravans. The Council considers that actual or perceived impact on property values is not a material planning consideration. This site is allocated for housing in the emerging Chorley Local Plan 2012-26. The Council has discounted this site as a Gypsy and Traveller site because as a linear site it may not be able to accommodate 5 pitches and there may not be sufficient land to provide an adequate buffer to protect environmental quality, which could result in a detrimental impact on the immediate surrounding area and therefore fail to satisfy Core Strategy Policy 8, criterion (d).
One of the sites being considered is named Crosse Hall Lane when in fact the site is actually on Haworth Road. We were in the process of selling our property until the prospective purchaser was told that Travellers were coming to Crosse Hall Lane. When he learned that he pulled out of the purchase. I would be most grateful if you could correct all your literature concerning this site and put it under its correct address of Haworth Road.

The site is not suitable. This is a residential area and the site is on the entrance to a new estate which has not even been completed yet. I am sure most of the people who have come to live there would not have moved there had they known the site would be developed as a Gypsy and Traveller site. It is extremely unfair to these residents.

It is not possible to alter the name of the road in the Preferred Options document and associated documents as they are already out for consultation. The Council will make this appropriate amendment to add Haworth Road before submitting the document to the Local Plan Inspector (September 2014). It will also amend the Local Plan accordingly.

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
I would like to oppose this site as an option to house Gypsies and Travellers. My reasons are as follows:

1. I live in the Rivington View estate adjacent to the proposed site and can confirm there is already a traffic problem on Crosse Hall Lane due to the primary school that is located on the same road. The problem would be made worse with the addition of a site housing Gypsies and Travellers.

2. Housing Gypsies and Travellers at this site would make it extremely difficult to sell our property causing the value of houses on the estate to decrease dramatically. This is unacceptable.

Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.

The Council considers that actual or perceived impact on property value is not a material planning consideration.

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
I would like to make a formal objection to the Traveller site on Crosse Hall Lane, having myself previously lived near a Traveller site I can't begin to tell you the issues Chorley Council will have. I am especially concerned at how close to St James's Primary School this proposed site is.

Objection noted. Proximity to School has been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
My family live on Rivington View estate and I lived there for several years and its where I spent my youth years. I am distressed at the news that Travellers might be moving in at the top of the estate next to a school. It will totally change our community. I have spoken to many neighbours and we all have the same opinion about this matter and hope our voices are heard. It will not be good for any of us who live round here. Please think about this decision. Hopefully you will make the right choice and not move Travellers on the opening of our lovely estate.

Objection noted. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
I am writing to object to this proposal for many different reasons, one reason in particular is that this proposed site is directly next to a primary school. This is asking for all kinds of trouble.

Councils response

Objection noted. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
I’m sure that you will have been inundated with communications in respect of this proposal. I would expect a fair amount of NIMBY’ism has been reflected in those objections, certainly that is true of a number of missives I have seen on the subject. However, in the light of the reason, I would like to express a rational de facto objection to this proposal. This is based on easily evidenced information. The assessment of the site fails to acknowledge that the Crosse Hall Lane entrance is the sole entrance and exit to the Rivington View housing development, as well as a number of dwellings and farmstead. Had the site assessment had the forethought to examine the proposed site correctly, and over an extended period of time, they would have noticed that this is the single access to a large number of dwellings, also this single access has to manage the flow of dairy tankers collecting milk, farm machinery (including but not limited to tractors, slurry bowsers, animal feed trailers and general farm paraphernalia). This is not to mention the daily throughput traffic associated with utility vehicles, delivery vans and trucks and contractors and development site equipment.

Furthermore, the bus garage adjacent to the entrance to Crosse Hall Lane frequently, as in at least twice a day through the week, has early morning dispatch of the bus fleet which returns early evening. This can be further compounded by the often illegal parking of private hire cabs and taxis that wait, often on double yellow lines, awaiting the decantation of merry imbibers from the Shepherd’s Arms public house situated directly at the junction of Crosse Hall Lane and the main road. This added to the assessment which uncharacteristically accurately referenced the school run, and hyper congestion of abandoned vehicles on both sides of the road at school collection times.

Without wishing to add further to this already sporadic chaotic situation, I feel that I must present the full impact of this ill conceived proposition. The addition of the suggested caravan site will cause absolute gridlock. Why might this be the case? Because with each Traveller and his/her mobile dwelling and entourage comes the inevitable necessary tow vehicle. These are almost inevitably far from the normal four door saloon car, often being three ton trucks and transit type vans. I would guess that the pitches for the caravans will not have been or will be designed to accommodate commercial vehicles, these therefore will unavoidably spill onto the sole access carriageway into and from the area. God forbid this is further impacted by the addition of livestock of the equine variety.

I would urge you to assist the residents and add your full weight behind our quest to turn down this ill-conceived proposition.
Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
1: Evidence why available/suitable/achievable? Yes

2: Agree with preferred site? Yes

3: Comments on document

We are residents of Chorley East and would like to address a strong concern that we and our fellow neighbours have regarding the most recent report of the Chorley Local Plan 2012-2026 Gypsy and Traveller and Travelling Showpeople Preferred Options. We occupy a residence on Haworth Road near one of the sites under consideration for permanent Gypsy and Traveller provision at Crosse Hall Lane. We vehemently oppose this Council owned site being repurposed for use by Gypsies and Travellers for two main reasons:

1. It would greatly diminish the beautifully crafted aesthetics of the Morris Homes development (aesthetics that local residents have paid for in good faith that they will be preserved) which would decrease the potential resale value of our property.

2. Its close proximity to St James’s school which already causes heavy traffic congestion on Crosse Hall Lane and Haworth Road.

I would appreciate your immediate support in this matter and would welcome any action from Chorley Council to oppose the choosing of Crosse Hall Lane as a site for Gypsy and Traveller provision and endorse the Cowling Farm site as the most appropriate alternative.

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared? □

5(2): Not justified? □

5(3): Not effective? □

5(4): Not consistent with national policy? □

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response

Support for Cowling Farm noted. Local Plan Policies are in place to protect the general amenity of an area and the perceived detrimental impact on property values is not a planning policy consideration. The proximity to the school has been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council
acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
We are writing to inform you of our objections to the proposed development of a permanent Gypsy and Traveller site at the entrance to the Rivington View housing estate on Crosse Hall Lane. We are concerned that this development will not be in-keeping with the surroundings of Rivington View, which has been carefully landscaped and which we all pay a maintenance fee for. The installation of caravans and vehicles such as vans and trucks right at the entrance to the estate will be extremely detrimental to this landscaped environment. The proposed parcel of land also appears to be too small to incorporate both the site for caravans as well as the numbers of vehicles which are normally associated with these and it is inevitable that this will lead to additional on road parking.

We are also concerned that the entrance to the estate from Eaves Lane is very narrow and will be insufficient to cope with the increased vehicle traffic that any new development will create. This is particularly significant as it is proposed to be sited next to a school, which already creates congestion at start and finish times during the week. We also feel that this will create an increased risk to the safety of the children entering and leaving the school at these times.

We trust that you will listen carefully to the residents of Rivington View and note these objections when making your decision to grant or deny this planning permission.

Local Plan Policies are in place to protect the general amenity of an area. Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision
of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
I am in the process of buying a new property on Morris Homes Rivington View site, but to my dismay find out Chorley Council is proposing to put a permanent Gypsy/Traveller site next to St James’s school on the entrance to Rivington View. I will be paying a large amount of Council Tax and ground rent to Chorley Council and strongly object to this proposed site.

Objection noted. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
I am writing to strongly object to the proposed Gypsy/Traveller site proposed for Crosse Hall Lane. I am in the process of buying a new build with Morris Homes at Rivington View, hoping to complete in late August looking forward to my new home has now taken on a different meaning. The residents who live there pay money for the upkeep and tidiness of the area. It is a beautiful housing estate and now I feel it would be tainted with unnecessary upset. Please help Chorley Council by stopping this proposed site in becoming a reality.

Objection noted. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
We are writing to strongly object to the possible Gypsy/Traveller site proposed for Crosse Hall Lane, Chorley. When we recently purchased our property, we bought it on the understanding that it would develop as was expected. Now, with the current proposal, the future of the environment of our new, beautiful housing estate is in jeopardy. Please help us, Chorley Council, by stopping this proposed site in becoming a reality.

Objection noted. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
Title: Mrs
First Name: Dorothy
Last Name: Birchall
Organisation:

Site/location
7. Crosse Hall Lane

Paragraph/section

Modification

1: Evidence why available/suitable/achievable?
2: Agree with preferred site?
3: Comments on document
I have had leaflets posted through my letterbox telling me about a proposed development for a Gypsy and Travellers site in Haworth Road and Crosse Hall Lane, which I strongly object to as it is near to a lot of property and a school.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes

8: Participate in examination?
9: Reason participation necessary

Council's response
Objection noted. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8. Appropriate design would ensure that proximity to property would not be an issue. Highways issues relating to proximity to the school have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.
Title: Dr  
First Name: Lauren  
Last Name: Murphy  
Organisation:  

Site/location: 7. Crosse Hall Lane  

Paragraph/section  
Modification  
1: Evidence why available/suitable/achievable?  
Yes  

2: Agree with preferred site?  
Yes  

3: Comments on document  
This site is very small and I am concerned regarding the impact that a potential Travellers site could have if placed here. Rivington View is a large housing development with the only access road being Crosse Hall Lane, continuing onto Haworth Road. I am concerned that Travellers caravans etc. could block this already narrow road. The site is also highly visible and adjacent to a primary school with multiple care and pedestrians here at school times. Also, as is frequently reported in the press, Travellers sites can become an eyesore and cause friction with local residents. Should this occur, living on Rivington View may become very unpleasant and could negatively impact on property prices. Considering the preferred option, this site is very expensive given the potential number of pitches it could provide.

4(1): Legally compliant?  
Yes  

4(2): Sound?  
Yes  

5(1): Not positively prepared?  

5(2): Not justified?  

5(3): Not effective?  

5(4): Not consistent with national policy?  

6: Reasons not legally compliant/unsound  

7: Necessary changes  

8: Participate in examination?  
Yes  

9: Reason participation necessary  

Councils response  
Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site. The Council will work with the police and local community in seeking to tackle community cohesion matters as part of the progression of its final site to planning application/delivery stage. The Council considers that actual or perceived impact on property value is not a material planning consideration. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
We wish to object to the possible creation of a Traveller site on Crosse Hall Lane, Chorley. There are 4 principal reasons why we think the suggested site is unsuitable for such a site:-

1) The field on which the Traveller site is proposed is immediately adjacent to St James’ Primary School, and in particular to one of the school’s fields it regularly uses for outdoor physical education. We feel that a field full of caravans with their attendant vehicles and the necessary facilities – toilets, rubbish collection, water supply, and the like – would seriously impact upon the school’s own facility. Additional security might be needed to separate the school grounds from the site, and the Travellers themselves might be concerned about their own privacy when children are playing on the adjacent field.

2) Access to Crosse Hall Lane is already restricted at the narrow entrance to the road. At busy times, we often have to give way to traffic coming in the opposite direction. This is particularly the case at times when parents arrive either to drop off or pick up their children from the school; at these times the road, and its continuation into Haworth Road, is particularly congested. Additional traffic generated by caravans arriving and leaving would further exacerbate this situation, and would certainly pose extra danger to the many children who cross the road at this point, or descend from their parents’ cars.

3) The Rivington View estate, on which we live, and to which Crosse Hall Lane is the only access, has been very carefully designed with aesthetics in mind. The builders, Morris Homes, have given great care to the look and feel of the estate, and they maintain it meticulously. We feel that the siting of a Travellers’ site along the access road would seriously detract from the lovely environment that the builders have created. Residents must pay an annual maintenance fee to the builders to maintain the grounds and the look of the estate:- presumably the Council will reimburse residents this fee if the Travellers’ site goes ahead on Crosse Hall Lane?

4) The suggested site itself is very small, and would be even smaller once toilet facilities and the like, and an entrance / access road are provided.
8: Participate in examination?

9: Reason participation necessary

Councils response

Any allocation would be subject to detailed design considerations and the Council would seek views from the police architectural liaison officer in respect of measures to promote community cohesion.

Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.

Local Plan Policies are in place to protect the general amenity of an area. It is acknowledged that the site is not large enough to accommodate a 5 pitch facility. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
Following extensive consideration of the Councils' proposal to consider Rivington View as a permanent site for the Traveller's community, I alongside my family urge you to reconsider.

Essentially, as I understand the site is to 'house' at least 5 units which if I understand correctly the Rivington View plot of land would not meet the criteria to provide parking, amenities nor the units.

Additionally, given this plot is next to a primary school & Traveller’s move constantly so are probably not registered residents I would like some confirmation that those families proposing to use the site are not registered as criminal offenders.

Furthermore, I do wonder what this will do to the site of Rivington View, given people here have purchased the property in good faith & it is yet still under development.

Finally, we also have the following in mind:

- increased noise and traffic congestion; this is already a challenge especially during school runs & bad weather
- our rural environment costs - we do pay extensively each year to maintain the upkeep. Is this a charge that will also be the responsibility of the Traveller community or are the residents going to be expected to pay increased fees?
- how will pollution of the canal, fly tipping, the potential increase of crime or related activity to either the Travellers and/or the current residents be managed?
- these are not dwellings in keeping with the aesthetic appeal of Rivington View; as stated residents pay for maintenance of the land, also lease hold fees etc.? clean & healthy environment; where will the waste & excrement be stored/moved and or disposed of as these will not be units of bricks & mortar with built in sanitation - will dogs & pets be kept on leads throughout the estate, on the land & what or how will penalties for those who do not clean up after them be managed/policed?.

It is a relatively young estate with young children so I am conscious to know what responsibilities will be enforced to manage safety, environmental, cleanliness and people within the new community

As you can appreciate this has not been received well nor has the lack of correspondence regarding the consultation.

It is difficult to conceive such a thought that dwellings/units can be placed in such a small area, next to a primary school with little access and no communication to residents or parents.

I know everyone is entitled to reside somewhere. However, surely this needs to be an appropriate place, managed, communicated and more importantly not compromised.

4(1): Legally compliant?
The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.

Chorley Local Plan 2012-2026 Policy BNE1 - Design Criteria for New Development criteria g) seeks to ensure that any new development will not cause ‘an unacceptable degree of noise disturbance to surrounding land uses’. Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.

Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and buildings. There are planning policies and environmental health legislation that would cover this issue e.g. Core Strategy Policy 29: Water Management

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of sites received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.
The Preferred Options exercise is in direct response to the short-term need for a minimum of five permanent pitches within the Borough. Any site must be capable of accommodating at least this number of pitches and must be immediately achievable, suitable and available. As outlined above, the site-specific requirements for a Gypsy and Traveller permanent pitch extend far beyond providing adequate space for the accommodation of five traditional trailers. The Gypsy community itself specifically requires that the site accommodates two mobile homes, five touring caravans, utility block, parking facilities, garden areas and a play area. This requirement ties in with the recommendations outlined in the DCLG Guidance (2008) and the Homes and Communities Agency Review (2012), although these documents also advocate the need for amenity buildings for each pitch, together with a warden’s office. Those separation distances set out in the DCLG Guidance (2008), which relate to health and safety and are referred to earlier in this letter, should also be provided. The site at Crosse Hall Lane extends only to a maximum width of approximately 55m; it has a depth of between approximately 23m and 45m. Allowing for adequate manoeuvring space and separation distances for health and safety purposes, the site barely has adequate room for the accommodation of three or four traditional trailers (up to 15m length) and this does not account for outdoor garden areas, amenity building, communal buildings and wardens’ office, larger mobile homes (up to 25m length) and separate sleeping accommodation for older children. The site is in direct conflict with the accommodation needs of the Gypsy and Traveller community and its identification as a potential site is therefore contrary to the Government’s Planning Policy for Traveller Sites (PPTS).

Location:
This site is one of the furthest away from both Adlington Primary School and Southlands High School. A site in this location would result in a 5.8km walk to the former and a 3.5km to the latter which is beyond a reasonable walking distance, particularly with regard to those children of primary school age. This would compromise a key requirement of the Gypsy and Traveller community. With regards to other locational factors that the Gypsy and Traveller community consider important, the site does not perform well in relation to access to GP services or post office services, when compared with other sites in the Preferred Options Report. The site is a short distance from a main road and is reasonably placed with regard to public transport but these factors are not considered to form a sound basis for identifying a potential Gypsy and Traveller site with Policy A of the PPTS in mind.

Visual impact:
Any scheme to provide permanent pitches would necessitate significant changes to the visual appearance of the area. The structures and paraphernalia associated with a permanent Gypsy and Traveller site would appear incongruous and out of keeping with the general built form of the surrounding area. Furthermore, the erection of robust and defensible boundary treatment between pitches and to the outer boundaries of the site, as a response to the Gypsy and Traveller community’s requirement for safety and security, is likely to appear stark in relation to the
character of the area. Due to the temporary appearance and nature of the structures and paraphernalia associated with a permanent Gypsy and Traveller site, such a scheme in this particular location is likely to detract from the character and appearance of the general area, as well as the setting of the Leeds-Liverpool canal.

Other sites:
The Council notes that all the other eight sites set out in the Preferred Options Report are large enough to accommodate a minimum of five permanent pitches, with the exception being Hut Lane in Heath Charnock. We understand that Hut Lane has been included as a potential site as it accommodates existing pitches on a temporary basis. However, having regard to size and location we do not understand the justification for Crosse Hall Lane being included as an option. The sites listed no. 1 – 9 within the Preferred Options Report appear to be listed sequentially with the Council’s most preferred option being no. 1 (Cowling Farm) and least preferred site being no. 9 (Hut Lane, Heath Charnock). The site at Crosse Hall Lane is listed at no. 7. We support the Council’s position that those sites listed as no. 1 – 6 are sequentially more preferable to Crosse Hall Lane, primarily due to them being of an adequate size. However, we do not understand the justification for the site at Harrisons Farm in Adlington being listed as sequentially less preferable than Crosse Hall Lane and this is discussed below. The site at Harrisons Farm in Adlington is approximately 400m walking distance from Adlington Primary School. Being able to keep their children enrolled at Adlington Primary School is one of the key requests made by the Gypsy and Traveller community (GTAA 2014). This compares to a 5.8km walk to the primary school from the site at Crosse Hall Lane, which is beyond a reasonable walking distance for children of primary school age. In addition to the above, Harrisons Farm is within easy walking distance of Adlington Train Station (approx. 400m walking distance) with good access to bus services along both Chorley Road and The Common. When compared with the site at Crosse Hall Lane, Harrisons Farm has better access to public transport, is closer to a post office and the same distance to GP services. In terms of location, Harrisons Farm is better suited to the accommodation needs of the Gypsy and Traveller community than Cross Hall Lane. Harrisons Farm extends to approximately 11.7ha in size with space to comfortably accommodate those needs of the Gypsy and Traveller community. It would also allow for those families to expand and for additional pitches should the additional GTAA study work identify such a need. The site has already been identified as potentially developable as a Safeguarded site in the Local Plan Policies Map. Having regard to the above, we consider that Harrisons Farm is sequentially more preferable than Crosse Hall Lane as a potential Gypsy and Traveller site for the purposes of the Preferred Options Report. Unfortunately, we are not able to comment on the sites suggested by the existing Traveller community at Hut Lane (Appendix 2 of the Preferred Options Report) given that no location plans are provided.

Conclusion:
We do not understand the rationale for the site at Crosse Hall Lane being identified as a potential site within the Preferred Options Report. It is inappropriate in terms of both size and location and does not reflect the accommodation needs of the Gypsy and Traveller community and is therefore, contrary to Planning Policy for Travellers and Showpeople (PPTS), Policy 8 of the Joint Core Strategy and the guidance set out by DCLG and Homes and Communities Agency on the design and layout of permanent pitches. Furthermore, a permanent Gypsy and Traveller site at Crosse Hall Lane would undermine the character and appearance of the site. We support the Council’s position that the other sites listed no. 1 – 6 in the Preferred Options Report are sequentially preferable but consider that Harrisons Farm is also sequentially preferable to Crosse Hall Lane. Should the need arise for additional permanent pitches as a result of the forthcoming additional GTAA study work, it is considered that the Council should expand their search parameters with a more updated Call for Sites exercise across the Central Lancashire sub-region. We should be grateful if the Council would
give full consideration to the above points and request that they are brought to the Local Plan Inspector’s attention.

4(1): Legally compliant? □
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

Comments noted.
The site falls within sustainability band B. It has good access to public transport with frequent bus and rail services and is in close proximity to all local services and facilities with the exception of a GP surgery and post office. It has poor access to a motorway junction which is over 3km away.
The sites are not listed in order of preference, rather, one site is highlighted as a preferred option and the others have been assessed and discounted for a variety of reasons as detailed in the main report.
The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
I believe that if provision should be made it should be in consideration of all stakeholders and in doing so, promoting co-existence and the difficulties in achieving this, no site within a direct vicinity of existing residential dwellings should be considered. However, based on all the criteria set out, the site at Cowling Farm meets this more than the site at Crosse Hall Lane which is the focus of my objections.

The document is well prepared in meeting the objectives it sets out to do and gives a brief overview of the national policies and what it is trying to achieve. However, it is obvious that prior to completion of this document engagement and consultation has already taken place with the Travelling community and their wishes are clearly documented within. I personally have not, nor is it documented whereby existing communities or stakeholders have been engaged thus far and the opportunity to document their wishes in the document has been missed.

Para 5.2 - Given the importance that the Government and therefore local Council's attribute to Greenfield sites, is it not justified in suggesting that there are many more brownfield sites which could be considered and which meet the suggested criteria?

Para 5.8 - Is it not fair to suggest that integrated co-existence just cannot be achieved given the volume of resistance to the proposal from the local community?

Para 6.11 - How does fencing the site promote peaceful and integrated co-existence? Is it fair to suggest the Travelling community themselves are expecting a degree of hostility given planning approval against such local opposition?

Part of the desire to move to the Rivington View development of Morris homes and the associated lease, in which we all accepted the terms to ensure that lease holder had a legal obligation to ensure that the buildings, land and landscape are maintained in a correct manner. We as residents have made efforts to contribute to the thoughtful aesthetics created by Morris homes and have built a community based on these values. We continue to pay service charges in efforts to maintain this and the character in which the properties were and continue to be designed and built. Any approval to allow a permanent Traveller site in the direct vicinity is a contradiction and is actually highlighted in the consultation document which states “no unacceptable impact on the immediate surrounding areas and the wider landscape” I do believe that the re-sale value of our property and for that matter, existing financial affairs of Morris homes, who continue with construction on this site will have already been affected, by just the mention of Gypsy/Travellers and Crosse Hall Lane in the same sentence.

Furthermore, is it considerate that plans should be considered given the vicinity to the school, whereby at drop off times congestion and parking is difficult, unnecessary increases in traffic can only serve to add to this and any potential negative impact to congestion and road safety concerns for children's movements should be minimised.

Furthermore, what provision will the Council make in its consideration of the plans for the school and responsible authorities to allow for effective monitoring of known
offenders, which may reside permanently or not within the site, and by their own admission can be a nomadic existence due to the nature of the work they undertake. Personally, I am disappointed given the lack of direct communication on the subject from the Council, who must be aware this is a contentious issue. Like it or not there is a stigma attached to Travellers, of course we respect their wishes, by having a democratic society we allow the consultation process, due diligence and decisions, however this must be fair and the wishes of the majority must also be considered.

4(1): Legally compliant? Yes
4(2): Sound? No
5(1): Not positively prepared? 
5(2): Not justified? ✓
5(3): Not effective? 
5(4): Not consistent with national policy? 
6: Reasons not legally compliant/unsound
I do not consider the Preferred Options document is sound as it is not justified because:

Evidence of participation of the local community and others with a stake in the local area in the preparation of the Local Plan - The wishes, opinions of others with a stake in the local area should have been taken into consideration and documented within, to my knowledge, and in direct association with my objection to site 7 Crosse Hall Lane, local residents, businesses and St James's school, important stakeholders have not been engaged and there is no evidence in the document of their and others participation. It is also worth noting that the address used as Crosse Hall Lane in respect of the physical address (Haworth Road) is incorrect and open to misinterpretation.

Whether the Local Plan provides the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal - There are numerous realistic brownfield site alternatives which should be considered. Due to the importance of Greenfield sites and the wishes of the existing residents, consideration of these sites should be given a higher priority above the wishes of the Travelling community and in respect of developing Greenfield sites and the wishes of existing residents.

7: Necessary changes
The document should take into consideration the wishes of all stakeholders, this should include not just the Travelling community but those wishes and opinions of all stakeholders (schools, businesses and existing residents) and should be documented within the plan.

8: Participate in examination? Yes

9: Reason participation necessary

Councils response
The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.

Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.

The Council considers that actual or perceived impact on property value is not a
material planning consideration. The Council will make this appropriate amendment to add Haworth Road before submitting the document to the Local Plan Inspector (September 2014).

Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria g) seeks to ensure that any new development will not cause 'an unacceptable degree of noise disturbance to surrounding land uses'.

Chorley Local Plan 2012-2026 Policy BNE1: Design Criteria for new development promotes high quality design and a good standard of amenity for all existing and future occupants of land and building. There are planning policies and environmental health legislation that would cover this issue e.g. Core Strategy Policy 29: Water Management.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of sites received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.
We write to register our objections to this proposal document. In particular we feel that the timescale, the approach and the proposal outcome are flawed and do not represent a sound basis on which to proceed. Specifically, we believe that the nearest site to us mentioned in the Proposal – Site 7: Crosse Hall Lane is completely unsatisfactory related to the following and other points:

1. Impact on the Adjacent Residential Area
Development of this site will result in an unacceptable impact on the adjacent residential area and school.

2. Location next to a school
In the future there will be a need for expansion of the school which will no longer be possible.

3. Insufficient Size
Does not meet the criteria for selection as it is too small.

4. Visual amenity
The site is completely out of keeping with the surroundings.

5. Highway safety and adequacy of parking/loading/turning
The location on the bend will create a hazard and potential safety risk that presently does not exist.

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8. Highways issues have been considered by Lancashire County Council Highways, who
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<table>
<thead>
<tr>
<th>Title: Mr</th>
<th>First Name: Adam</th>
<th>Last Name: Wilk</th>
<th>Organisation:</th>
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<tbody>
<tr>
<td>Site/location</td>
<td>7. Crosse Hall Lane</td>
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<td>Paragraph/section</td>
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<td>Modification</td>
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<td>1: Evidence why available/ suitable/ achievable?</td>
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<td>2: Agree with preferred site?</td>
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<tr>
<td>3: Comments on document</td>
<td>Petition against developing Crosse Hall Lane as a Gypsy and Traveller site - signed by 419 people.</td>
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<td>4(1): Legally compliant?</td>
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<td>Councils response</td>
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Site/location: 7. Crosse Hall Lane

Paragraph/section: Modification

1: Evidence why available/suitable/achievable?
As a teacher safeguarding is a massive issue which shouts out to me as the site is directly next to a school, as you are aware all staff are strictly vetted before working in a school but this would put a potential hole in this. You could not monitor those that lived/visited the site.

2: Agree with preferred site?
Yes

3: Comments on document
Traffic is constantly a problem already around the school, this is already an accident waiting to happen without the extra traffic further development would potentially cause.

4(1): Legally compliant?
Yes

4(2): Sound?
Yes

5(1): Not positively prepared?
No

5(2): Not justified?
No

5(3): Not effective?
No

5(4): Not consistent with national policy?
No

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response
As with any other development proposal, BNE1: Design Criteria for New Development criterion h) requires measures to help prevent crime and promote community safety. The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.
Firstly I was made aware of this consultation by chance. How do you expect a fair and open consultation to happen if local residents are not directly involved, especially with a short timeframe to prepare responses?

Secondly, the site is not on Crosse Hall Lane and this is very misleading. The site is definitely located on land immediately next to Haworth Road, land that the residents of Rivington View estate currently pay a service charge to upkeep.

Thirdly, your consultation document representation form is far too restrictive and complicated to complete. It focuses on only one area per form, is mainly aimed at the preferred site and does not provide opportunity to fully explain objections.

My objections to this site being considered as any sort of option are as follows:

The site is on the only approach to the Rivington View estate, therefore the added congestion of caravans and associated vehicles will worsen the existing congestion along this road. Every day the road has parked vehicles along the stretch where the development would be, along with multiple parked vehicles at school times. The top of the road has a priority system which would only add to these issues with increased weight of traffic. Your document states less than five pitches but I see no reference to the vehicles expected with these five caravans, do you believe there to be only one vehicle with each, or the more likely answer of two or three per caravan, where are the extra vehicles expected to park? The road on approach to Rivington View estate is relatively narrow. Section 5.8 of your document mentions avoiding pressure on local infrastructure. 5.12 details suitable road access and turning space, parking and storage. This site does not cover these at all.

The land proposed is greenfield as stated in your documentation. The reason has been used to discount other sites under consideration but not this site. Development of this site would be directly contravene to the NPPF which is very strict about greenfield sites. This is echoed in your documentation 5.9. 5.12 details no unacceptable impact on the immediate surrounding areas and the wider landscape. Part of the land is fenced off at present and appears to be a well established wildlife habitat with semi mature trees and grasses filling the area.

Adding these two points together I seriously doubt you would ever approve housebuilding on this site with the associated vehicles/traffic issues that it would bring.

Your documentation asks for a site with a minimum 5 spaces and estimates this as 0.4ha. This site is not big enough for this requirement and has a potential of less than 5 pitches yet remains on the list.

This site is also used regularly by children from the surrounding housing to play, dog walkers and people to access the canal.
Will the Council be ensuring that the residents of this Traveller site, should it ever become one, are suitable to be placed within metres of a primary school? People with certain convictions are not allowed within a specified distance of a school, I struggle to see how this can be maintained with a regularly rotating population.

I do not think this site should be considered as an option for the reasons explained above. There is an active petition regarding this site being considered, Our Councillor has been contacted and Morris Homes who are currently developing the Rivington View estate are aware.

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared?

5(2): Not justified?

5(3): Not effective?

5(4): Not consistent with national policy?

6: Reasons not legally compliant/unsound

National planning policy states Green Belt land should be protected. This site is Green Belt as per your document but not discounted and remains on your list as a possible site/future site. Other sites have been discounted as not suitable based on being Green Belt. The plan is therefore contradictory. Your document states 'Traveller sites in the Green Belt are inappropriate development.'

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.

The site is greenfield and located within Chorley Settlement. In order to be allocated Local Plan policy HW2: Protection of Existing Open Space, Sport and Recreation Facilities would need to be satisfied.

The Council will alter the name of the road to Howarth Road before submitting the document and associated documents to the Local Plan Inspector (September 2014). The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.
It has been brought to my attention that Chorley Council are proposing Crosse Hall Lane Rivington View to be a potential permanent site for Gypsy Travellers.

As a resident of Rivington View I would like to contest this, on the grounds of:

There is only one entrance to the estate which is a priority road and in peak hours this is already heavily congested in peak times due to school drop offs.

I have concerns for the safety of the Travellers moving their caravans up and down the road as currently the road is owned by Morris Homes and so in bad weather conditions it doesn’t get gritted by the Council. This could lead to safety issues for children and also the Travellers.

Another main issue with having the site here is the lack of space. I don’t think the site is spacious enough to hold 5+ pitches and additional Traveller needs such as parking and washrooms to be built. Also this wouldn’t allow any room for expansion if more Travellers needed permanent residence on this site.

All schools in Chorley are already nearly at capacity and may need to expand in the near future. The land purposefully for the Traveller site would be ideal to expand on.

The preferred site at Cowling Farm seems like a more ideal spot as it offers a lot more space for the Travellers and has potential room for growth in the future.

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.

Highways issues have been considered by Lancashire County Council Highways, who
have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.
Lancashire County Council Education Department contributed to the process of allocation for housing in the borough and did not raise an issue about the need to expand the local school.
Comments on the preferred site at Cowling Farm being a more ideal spot are noted.
As a resident at Rivington View I would like to strongly contest this proposal. Below are a few points I would like to raise in my objection.

Coming on and off the estate can be quite difficult in peak hours, especially weekends and school drop offs. As there is only one access route into the estate it can be quite difficult to move up and down the road due to cars parked up for the school/ residents in the homes. This will only get more congested with the introduction of a Traveller site. This could also prove difficult for emergency vehicles such as ambulances, fire engines to accessing the estate which is home to over 200 homes.

I also have great concerns for the safety of the Travellers moving their caravans up and down the road in poor weather conditions. As the road is currently owned by Morris Homes the road therefore does not get gritted and could make the road unstable for the caravans while children play on the street, or grass nearby.

Another issue that concerns me is the size of the plot. I don’t believe it is big enough to contain 5 pitches as proposed as well as washrooms and car parks. Also if the Travellers family decided to grow there is no extra space to accommodate this.

I’ve also been led to believe from my Councillor that most of the schools in Chorley are almost at full capacity, and some schools may need to expand to allow for more children. The land proposed at Crosse Hall could be ideal if St James Primary needed to extend their playing fields, this seems like a more useful purpose for the plot.

Finally I would like to point out that the preferred site at Cowling Farm seems like a more ideal plot as it can offer the Travellers more space, as it is a lot more spacious and can offer the family more room to expand in the future. Also the road is owned by the Council so would be gritted in poor weather which wouldn’t affect the safety of the Travellers.

I hope my points will be considered, and once again I do strongly contest against the proposed settlement of a Traveller family on Crosse Hall Lane.
8: Participate in examination?

9: Reason participation necessary

Councils response

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.

Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.

Lancashire County Council Education Department contributed to the process of allocation for housing in the borough and did not raise an issue about the need to expand the local school.

Comments on the preferred site at Cowling Farm being a more ideal spot are noted.
I would ask that the following are taken into consideration for the proposed Travellers site at Crosse Hall Lane:

1. This land is actually on Haworth Road rather than Crosse Hall Lane.

2. The land is almost half the size of the stated minimum size required (0.4 hectares), and would require a second site in order to meet the minimum 5 households - at additional cost to the Council tax payer.

3. The site would not be in-keeping with the local street scene, and would be visible from the road.

4. Should this site be used, it would not allow any future expansion of St James’ Primary School, which I understand is nearing over capacity - as schools are not allowed to build on their playing fields.

5. The road is very busy - especially at school time, causing a danger to pedestrians and other road users. This additional building will increase traffic volume.

6. The cost of this site is prohibitively expensive, in comparison to the preferred Cowling Farm site.

7. The consultation has not taken place in a fair manner to existing residents living in surrounding areas to proposed sites. Residents have not been informed directly by letter. One article has appeared in local press, and the planning documents have not been placed in a prominent position on the Council website. This has limited our opportunity to investigate our options and legal position, and to respond within the allotted consultation period.

8. The site is located on an unadopted road - it is therefore not in control of the Council, and it being maintained at the cost of the local Morris Homes development. This additional traffic will cause wear and tear (especially given the size and weight of a large caravan). The expense of repairs would be borne by local Morris Homes residents until such a time as the Council is in a position to adopt the road. As residents, we have no control over this Travellers’ development, and the type of vehicles that will be used on the site. In addition, this road is not gritted and therefore is likely to be unsafe in winter conditions, for private cars, let alone large caravans and mobile homes.

9. The existing Rivington View site has only one access road (Haworth Road), leading to circa 200 homes. Should this be blocked for any reason, this causes a real safety problem, given the size of the vehicles which could use the road. We have particular concerns regarding access for emergency and refuse vehicles.

10. The palisade fencing will not screen the proposed Travellers’ development from view. Given that this would be a highly visible site from the road, it would be not in
keeping with the local surroundings and street scene.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

The Council will make this appropriate amendment to add Haworth Road before submitting the document to the Local Plan Inspector (September 2014).

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.

Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site. Detailed highways matters would be considered at planning application stage. Lancashire County Council Education Department contributed to the process of additional school places in Chorley and did not raise any such issues in respect of the expansion of St James' Primary School.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of sites received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.
I am a resident of the Rivington View estate Chorley. It has recently come to my attention that there are a number of proposed Gypsy/Traveller sites in my local area. I am therefore emailing you to express my objection to the proposed permanent Gypsy and Traveller site on Crosse Hall Lane, Chorley for the following reasons:

The site does not appear to provide the required size to support the Gypsy/Traveller community as requested e.g. regarding accommodating size of pitches/trailers.

The site is attached directly to a school preventing expansion requirements considering the increase of potential attendees from the Rivington View Estate.

Road safety may be an issue considering the access road is currently unadopted, especially at peak times when parents drop / pick up children from school.

I believe that the alternative proposed sites provide more satisfactory accommodation than the one on Crosse Hall Lane e.g. Cabbage Hall Fields, Cowling Farm and Yarrow Bridge depot (if removed from the Green Belt) and should therefore be considered for development.

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.

Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.

Lancashire County Council Education Department contributed to the process of
additional school places in Chorley and did not raise any such issues in respect of the expansion of St James' Primary School. Comments on the preferred site at Cowling Farm being a more ideal spot are noted.
I am writing this letter in respect of the Gypsy and Traveller and Travelling Showpeople preferred options (June 2014) document. The majority of the households oppose the proposed “Crosse Hall Lane” site described in the Gypsy and Traveller and Travelling Showpeople Preferred Options June 2014 report. The following arguments opposing this site have been developed giving a strong and coherent reason for the site not being suitable.

Reasons for not adopting Crosse Hall Lane as a Gypsy and Traveller site:

Design and Location of Gypsy and Traveller sites - The following information is taken from Central Lancashire’s Joint LDF Officer Team Report, dated 26 March 2014, sections 26, 27 and 28 - In addition to the provision of hot and cold water and electricity, there should be space on the site for the provision of a separate community building and community open space and grazing. The average Trailer size is 15 metres but some are as long as 25 metres. The study is based on Leighton Street, Preston. The site covers an area of 0.3 ha (3000 sqm) where five pitches have been installed each measuring 15 metres by 11 metres. Using the above information the total area for five pitches would equate to 825 sqm; all other amenities, therefore, are housed on 2175 sqm. If provision had been made for the larger trailers, which are approximately 25 metres by 11 metres, and area of 1375 sqm this leaves only 1625 sqm to house all other amenities; this would not be enough space.

The Crosse Hall Lane Site - Applying the Preston criteria to the Crosse Hall Lane site which is 0.23 hectares (2300 sqm), then five pitches at 15 metres by 11 metres, 825 sqm, would only leave 1475 sqm, 9% less than the Preston site, with not enough room for the recommended other requirements. In a worst case scenario, providing room for the larger trailers, only 1245 sqm is available for communal activity. This is a smaller area than the total of the pitch bases. In conclusion the Crosse Hall Lane site is unsuitable as a permanent Gypsy/Traveller site.

Other Considerations - A case could be made for a site with fewer than five trailers. However, the relative costs of providing two or more sites far outweighs that of a single site, especially as the local taxpayers would possibly be asked to help foot the bill. Additionally, it would be advantageous to the Gypsy/Traveller families to have a single site this is especially important where children are concerned.

The use of palisade fencing against the backdrop of the Rivington View estate is not in keeping with the general aesthetic of the surrounding area, and therefore does not meet criterion d of Central Lancashire Publication Core Strategy Local Development Framework Policy 8.

Finally, when preparing the site initially, some provision could be made to accommodate the larger trailer. The Chorley Local Plan 2012-2026 published in February 2012 states that the total 14 year requirement for pitches is five. Taking a longer timeline there is the possibility that more pitches may be required. This helps the case for looking at a larger site where the infrastructure can easily be extended.
I await your response regarding our objections.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
Please accept this email as a notified OBJECTION to the planned Gypsy/Travellers site location at Crosse Hall Lane in Chorley.

I must draw your attention to the following concerns:

Land Use: this planned development is on one of the last few open spaces in this local area. By building on this Green Belt location will only be a detriment to the surroundings. Developing this small Green Belt location for the plans indicated will be unsightly, and be out of keeping with the rest of the local area, given the more suitable locations elsewhere.

Land size (space): the space for this development is much too small to meet the criteria set out in the Council planning document, and does not fit the needs of the development.

Congestion: There is a school next to this plot, and at school peak times in the morning and afternoon, the area is already heavily congested. To consider manoeuvring caravans and larger vehicles into or out of such a small space next to the school is potentially dangerous.

Local Services: The plan does not meet the most important of criteria, which is the proximity to local GP services. Nor is it close to motorway junctions. The increase in larger vehicles not only impacts the area around Crosse Hall Lane, but also the roads between the motorway junctions and the planned development.

It must also be drawn to your attention that the residents of Rivington View have committed (legal covenants and financially) to maintain the high standard of the local area as developed by Morris Homes. This site plan will be highly visible at the top of the Rivington View development, be unsightly - and potentially goes against the agreements of the hundreds of surrounding residential properties. (It is worth highlighting that all of the residents of Rivington View have signed an agreement NOT to park/display any caravans/mobile homes etc. that they may own on their properties so as to detract from the local environment)

By your own planning document statements, this location is simply not fit for purpose. It is highly unsuitable for the requirements indicated, and ultimately will provide no benefits to either Travellers wishing to base here, or to the existing residents in the surrounding area.

I do hope that the planning department will see the inappropriateness of this location’s size, and reject Crosse Hall Lane from the siting list.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.

The site is not designated as Green Belt, the site is within the settlement of Chorley. The Sustainability Appraisal for the site notes the site is in close proximity to all local services with the exception of a GP surgery which is 0.81 to 1.6km away and distance to a motorway junction is over 3km. These are 2 of 42 sustainability indicators, which when taken together the site scores a sustainability band "B".

Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.
Although the Crosse Hall Lane site has been discounted, we wish to put forward our views in case this is reconsidered at any point. The site is in a highly visible location as mentioned by Highways and would impact on the surrounding landscape.

It seems short-sighted to use Council owned land directly next to a school for this when it could be needed for expansion of the school in future, especially when there is a shortage of primary school places in the area. The fact that the site adjoins the school grounds makes it unsuitable for keeping horses etc. The road outside the school gets very congested at drop off and pick up times and the entrance from Eaves Lane is very narrow. If large vehicles need to access the site regularly, both these factors would need to be considered.

We feel that the Preferred Options document is not justified for several reasons:

Inadequate consultation process - residents of the neighbourhoods affected by the proposed options were not directly notified of the consultation either by letter or by notices being put up in the area. Letters went out to some residents but not all. This meant that many people who wished to respond had very little time as they didn’t know about it until well into the 6 week consultation period.

No clear justification for the preferred site - although indicators for each site have been compared, there is nothing to explain why Cowling Farm has been chosen as the preferred site over others which scored far higher in the sustainability scoring and seem more suitable. Cabbage Hall Fields has scored green on all but 3 indicators yet Cowling has 12 indicators flagged as yellow or orange but has been chosen above Cabbage Hall Fields.

Unsound scoring system - the scoring system does not appear to be sound and has therefore given misleading results. No weighting has been given to the more important indicators. For example Ackhurst Road has a red indicator because it is more than 1.2km from a convenience store, yet there is a supermarket which is less than 0.8km away, making the proximity of a convenience store irrelevant.

Inclusion of unsuitable sites in the consultation - the conclusion of unrealistic sites in the options paper means that people are likely to say yes to the Cowling Farm site just to ensure that another site is not chosen rather than because they think Cowling Farm is the most suitable location.
The Traveller community's suggestions not given any weighting - the Traveller community at Hut Lane have suggested the Yarrow Bridge depot site. This has been discounted but it isn't clear why. The site is Green Belt and this is the main constraint, but the Cowling Farm option may also involve use of Green Belt land for access. Surely the fact that the Traveller community who have been consulted on this are in support of the Yarrow Bridge site should give it some weighting.

7: Necessary changes
8: Participate in examination? No
9: Reason participation necessary

Councils response

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.

Lancashire County Council Education Department contributed to the process of additional school places in Chorley and did not raise any such issues in respect of the expansion of St James' Primary School.

Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.

The Council's Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of sites received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

The approach to assessing sustainability has been used in all the housing and employment sites allocated in the Chorley Local Plan 2012-26 and has been considered robust by the Local Plan Inspector.

Yarrow Bridge has been considered and discounted because it falls within the Green Belt and there are no 'exceptional' circumstances which would warrant its allocation as the Council has identified other potential sites that do not fall within the Green Belt. Under Para 90 of the Framework, certain forms of development are 'not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in the Green Belt'. These include 'local transport infrastructure which can demonstrate a requirement for Green Belt location.'

In light of more detailed comments from Lancashire County Council Highways it is not necessary to pursue the access in the Green Belt to the south of Cowling Farm.
I would like to express my concerns about the proposed permanent Travellers site on Cabbage Hall Fields. I am against the proposition.

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site's size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
I oppose the proposed site on the following grounds:

1. The site is wrongly identified, it is in Haworth Road.
2. The consultation process is flawed. No local residents were notified.
3. The site is too small. I can supply the calculations if necessary.
4. The requirement to screen a site to create privacy will not fit in with the street scene.
5. The junction of Crosse Hall Lane and Eaves Lane, with the presence of the bus depot creates congestion.
6. The site could provide income if sold for housing both as a one off purchase fee and ongoing Council tax.

The Council will make this appropriate amendment to add Haworth Road before submitting the document to the Local Plan Inspector (September 2014).

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.

The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of sites
received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.
We are writing to raise our further concerns over the potential change of use from a Greenfield site to a permanent Gypsy/Traveller site. The land which is accessed from Haworth Road and not Crosse Hall Lane as detailed within the report is currently the responsibility of Morris Homes Ltd and has yet to be completed to Highways Agency standards and as such has not been adopted by the Council. We have suffered for over 4 years with a lack of gritting and in winter the road often becomes unsafe for road users and sometimes impassable due to snow and ice. This issue will be further exaggerated if towed vehicles/caravans are encouraged to use this section of roadway.

Furthermore, to provide a site capable of supporting 5 caravan pitches with associated car parking spaces, amenity buildings, suitable turning spaces without being overcrowded is not possible on a 0.23ha site. Especially as there is a requirement to provide a perimeter barrier i.e. stone wall that will obscure the visibility of the site and is in keeping with the existing street scene.

In addition, there is already regular congestion at the junction of Crosse Hall Lane and Eaves Lane due to the entry/egress of buses from the Stagecoach bus depot, the introduction of articulated vehicles will only cause further congestion.

Finally, the potential cost of developing this site, in excess of £300k coupled with the land costs c. £200k will effectively mean there will be a requirement for an 8.5% rise in Council tax within the ward to recover these costs.

The Council will make this appropriate amendment to add Haworth Road before submitting the document to the Local Plan Inspector (September 2014).

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
The cheapest site is Haworth Road (previously named Crosse Hall Lane) which has an estimated cost of £380,000 but it is too small to accommodate 5 pitches. The estimated cost of the remaining sites ranges from £480,000 to £600,000. Funding may be available from the Homes and Communities Agency.

Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.
119 letters containing 191 signatures submitted.

Reasons for not adopting Crosse Hall Lane as a Gypsy and Traveller site:

Design and Location of Gypsy and Traveller sites - The following information is taken from Central Lancashire's Joint LDF Officer Team Report, dated 26 March 2014, sections 26, 27 and 28 - In addition to the provision of hot and cold water and electricity, there should be space on the site for the provision of a separate community building and community open space and grazing. The average Trailer size is 15 metres but some are as long as 25 metres. The study is based on Leighton Street, Preston. The site covers an area of 0.3 ha (3000 sqm) where five pitches have been installed each measuring 15 metres by 11 metres. Using the above information the total area for five pitches would equate to 825 sqm; all other amenities, therefore, are housed on 2175 sqm. If provision had been made for the larger trailers, which are approximately 25 metres by 11 metres, and area of 1375 sqm this leaves only 1625 sqm to house all other amenities; this would not be enough space.

The Crosse Hall Lane Site - Applying the Preston criteria to the Crosse Hall Lane site which is 0.23 hectares (2300 sqm), then five pitches at 15 metres by 11 metres, 825 sqm, would only leave 1475 sqm, 9% less than the Preston site, with not enough room for the recommended other requirements. In a worst case scenario, providing room for the larger trailers, only 1245 sqm is available for communal activity. This is a smaller area than the total of the pitch bases. In conclusion the Crosse Hall Lane site is unsuitable as a permanent Gypsy/Traveller site.

Other Considerations - A case could be made for a site with fewer than five trailers. However, the relative costs of providing two or more sites far outweighs that of a single site, especially as the local taxpayers would possibly be asked to help foot the bill. Additionally, it would be advantageous to the Gypsy/Traveller families to have a single site this is especially important where children are concerned.

The use of palisade fencing against the backdrop of the Rivington View estate is not in keeping with the general aesthetic of the surrounding area, and therefore does not meet criterion d of Central Lancashire Publication Core Strategy Local Development Framework Policy 8.

Finally, when preparing the site initially, some provision could be made to accommodate the larger trailer. The Chorley Local Plan 2012-2026 published in February 2012 states that the total 14 year requirement for pitches is five. Taking a longer timeline there is the possibility that more pitches may be required. This helps the case for looking at a larger site where the infrastructure can easily be extended.

The site is directly attached to the playing field of St James's primary school. According to Ofsted the number of pupils has been rising steadily between 2011 and 2013 and the school themselves have proclaimed themselves as a growing school. Despite this the Department for Education states the school's maximum operational capacity is
only 180. It is natural to expect that the school would want to expand its operational capacity to include more pupils from the increasingly populated Rivington View estate.

Perhaps the most crucial point is one of safety. As the site is only accessible via Haworth Road which remains unadopted, the Council cannot ensure that the road:
- will be gritted regularly in winter
- will be kept clear for emergency access at all times
- remains as uncongested as possible during peak times.
A remedy for the last point could be possibly to add additional parking for parents on the site in order to lessen the existing problem with parents parking at the top of Haworth Road and preventing the smooth flow of traffic into and out of the Rivington View estate.

I believe that of the preferred options detailed in the report only the Yarrow Bridge depot, Cabbage Hall Fields and Cowling Farm sites completely satisfy all of Core Strategy Policy 8 criteria and therefore should be the only sites considered for development moving forward.

I await your response regarding our objections, which I will forward to all signatories at their behest.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

The Council has discounted this site as a Gypsy and Traveller site because the site is too small to accommodate the minimum 5 permanent pitches required. The Council acknowledges that the site’s size would restrict the number of plots and the provision of any amenity space. It is on a main access road and is highly visible. It would not satisfy Core Strategy Policy 8.
Lancashire County Council Education have been consulted as part of the local plan allocation process and have not raised issues in relation to St James’ primary school expansion.
Support for Yarrow Bridge depot, Cabbage Hall Fields and Cowling Farm sites noted. Highways issues have been considered by Lancashire County Council Highways, who have stated that the junction of Eaves Lane and Crosse Hall Lane could safely allow passage of caravans and that although the junction can get congested during school pick up and drop off periods, there would be no highway objections to the location of this site.
The options report fails to identify that the site is adjacent to two Grade II listed buildings - the Old School House to the south west and Red House Bridge to the east. The NPPF considers that any substantial harm to or loss to the significance of a Grade II listed asset (including setting) should be exceptional. The site's close proximity to two designated heritage assets will require development proposals for the site to demonstrate that they conserve those elements that contribute to their significance and setting.

The Plan needs to be amended to recognise the need for development to minimise the harm to the significance of the historic environment. The Plan should also make it clear that a heritage impact assessment needs to be undertaken and without such information, it cannot be demonstrated that the site is developable without unacceptable impact on the historic environment and this may put a risk to the development of the site.

English Heritage agreed that if the Council undertakes a heritage impact assessment and expanded on the potential impact and mitigation relating to the heritage assets close to the proposed sites in the document, they would withdraw their objection. A heritage impact assessment has been undertaken in co-operation with English Heritage and they agree that mitigation would secure an acceptable relationship between development at Harrisons Farm and the designated heritage assets. New text has been added to the Harrisons Farm section of the Proposed Allocation Document in order to satisfy the points raised.

On 21 August 2014 English Heritage confirmed "English Heritage welcomes the approach taken on the sites and broadly accepts the conclusions and proposed mitigation measures in the heritage impact assessment (to be included within the Appendix of the Sustainability Appraisal), as well as the amendments to the Plan itself. In view of the above, English Heritage wish to withdraw their objection to these matters with regards the soundness of the Plan".
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**Councils response**

Additional comments are included in the Sustainability Assessment in the Proposed Allocation Document to recognise the proximity to the heritage assets and to ensure a positive approach is taken to the historic environment. On 21 August 2014 English Heritage confirmed "English Heritage welcomes the approach taken on the sites and broadly accepts the conclusions and proposed mitigation measures in the heritage impact assessment (to be included within the Appendix of the Sustainability Appraisal), as well as the amendments to the Plan itself. In view of the above, English Heritage wish to withdraw their objection to these matters with regards the soundness of the Plan".
We would like to object to the proposed Gypsy/Traveller site for Harrison's Farm, Adlington. We do not consider this to be acceptable.

Objection Noted. Harrison's Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
Access to the site is not good either via the bridge or over the canal (not suitable for caravans) or via Park Road due to parked vehicles on both sides of the road, which has now reached saturation point and also the effect on the value of property in the area.

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

The Council considers that actual or perceived impact on property value is not a material planning consideration.

Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
Following my phone call, as requested please make a note that the map of Harrison's Farm is not marked correctly. The Farmhouse, buildings, yards and garden area are privately owned and this is not clear on the map.

I object to this site for Gypsy, Travellers and Travelling Showpeople. I was asked by your office to use a representation form or a letter, I am sorry but I find the form very difficult.

Harrison's farm and area is an excellent asset to the Borough and widely used by both local walkers, families, cyclists, dog walkers and longer distance walkers on route to the canal towpath, many would cease to use it for the above uses because of the proximity of the development.

Park Road being a great concern for everyone's safety, any additional traffic would cause chaos. Below are bullet points raised by local residents, I must agree they are a major problem and all should be considered. There is a particular point to be considered on Old School Lane, a widening of the road would encroach on the mature oak trees protected root zone of which there are many along the whole lane and farm track.

Comments in relation to site:

1. Access to the site is via Park Road, The Common and Old School Lane. Access is already difficult in a car and more so in a larger vehicle because of parked cars. Park Road is already seriously overloaded with parked cars and traffic presenting a nuisance and a hazard for vehicles travelling to and from the A6. Every resident or visitor to this area must travel down this road and negotiate the parked cars. Access for emergency service vehicles is already difficult.

2. Any increase in traffic must be avoided, particularly large trailers, large caravans and the like. Because of the frequent need to pull into a small gap and wait to let other vehicles through, there are times when it would be impossible to get these types of vehicles down these roads because of parked vehicles.

3. The Park Road area has been a '20 is plenty' zone with speed humps for some years reflecting existing concerns regarding traffic in a residential area. Any increase in traffic through Park Road would have significant impact on risks to people from traffic. This was a factor in the recent decision not to create allotments near The Common.

4. Old School Lane is a quiet residential road and the turning left from it into the access to Harrison's Farm is a tight corner and not suitable for large vehicles. There is a Grade II listed building located on the inside corner further restricting the scope for improvement of the access.

5. The canal bridge at Red House is a Grade II listed structure. Access to Harrison's Farm across this bridge is restricted as the bridge is narrow and steep and has already
been damaged by vehicles attempting to cross. Satellite navigation systems frequently
direct people to Lower Adlington along Harrison Road and across this bridge and any
new residents could also attempt to come this way and damage the bridge.

6. The rainwater drains have historically been a problem in this area, particularly in
Crawford Avenue, and any additional paved areas will necessitate connections to the
existing infrastructure adding to the load particularly under storm conditions,
potentially increasing the likelihood of flooding. Other services such as gas and
electricity will also need to be introduced to the site at additional cost.

7. There will be a loss of good productive farmland at a time when the nation requires
such land to be used effectively.

8. Such a development will blight surrounding land affecting existing property prices,
but also having a potentially adverse impact on any future proposals to develop the
land. This would be detrimental to both the Council and Chorley Borough residents in
that it would represent a lost opportunity cost for the land in question, if say at some
point in the future the land was potentially subject to residential development.

9. The land outlined on the map attached to the proposal is not all owned by Chorley
Council. There are strips of land in private ownership and there are two private
residences in this area, one of which is privately owned. The map is therefore
misleading to anyone examining the proposal and cannot be used as a basis for making
a sound decision on this matter.

10. Any change of use of this land could lead to the loss of an amenity area. The
current public footpath across the land is widely used by both local residents and
people from farther afield. Local people walk, cycle, walk their dogs often with families
and exercise horses. Many others use it as a route on longer distance walks and cycle
journeys. This is an excellent asset to the Borough which would be threatened by the
proposal. Many people would cease to use it for the above uses because of the
proximity of such a development which would make it a less attractive route through
to the canal towpath which is also used by many people.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? ☐
5(2): Not justified? ☐
5(3): Not effective? ☐
5(4): Not consistent with national policy? ☐
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary
Councils response

Harrison’s Farm is allocated as an area of land safeguarded for future development
needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26,
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be made to deliver this proposal. It is recognised that the canal bridge is a Grade II
listed structure and an impact assessment has been undertaken. It is considered that
this bridge would not be a suitable access.
Trees are protected under Chorley Local Plan 2012-2026 - policies BNE1 - Design Criteria for New Development and BNE9 - Trees. The Council considers that actual or perceived impact on property value is not a material planning consideration. It is recognised that not all of the land is in Council ownership hence the expression 'predominantly in Chorley Council ownership'. The site is 11.8ha in total. Part of the site is allocated for allotments and a cemetery extension. Of the remaining land the Council own 7.9ha, therefore the site could be delivered on Council owned land. United Utilities have provided further information on this site and state 'Foul and clean water pipes run through the site, therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree. We would seek the disposal of surface water via the nearest watercourse (or should this be demonstrated as not feasible, through other sustainable means). The location of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure.'

In addition to this form the Council has accepted comments by letter and email. A direct link was placed on the homepage of the Council's website when concerns were raised about the accessibility of the information. The Council also made an online consultation form available through Survey Monkey. Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
The representation form is confusing. Points 4-7 ask specialist questions which the general public are not qualified to answer. You the Council should satisfy yourself that the Preferred Options document is fit for purpose for which it is intended and is legally compliant. Paragraph 182 of the NPPF is meaningless in isolation and is no use in clarifying this question. I do not think it is appropriate for lay people to answer these questions. The confusion inherent in the form is deterring local residents from using it and as a result they could be excluded from a legitimate consultation process. You should review the use of the form forthwith. The Council should satisfy itself on the legality of the documents and publish a new form for the general public to use which allows for comments on the various options which is what most members of the public are interested in.

In addition, what purpose does the attached monitoring questions serve? It is stated that the Council is committed to making sure that it takes into account the views of everyone in the Borough. How does this document contribute towards this aim? It is a vacuous form that has no place in this exercise. You know who residents are, or should do, so what purpose does this serve? It is a waste of your time and effort as well as Council Tax payers money.

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7. There will be a loss of good productive farmland at a time when the nation requires such land to be used effectively.

8. Such a development will blight surrounding land affecting existing property prices, but also having a potentially adverse impact on any future proposals to develop the land. This would be detrimental to both the Council and Chorley Borough residents in that it would represent a lost opportunity cost for the land in question, if say at some point in the future the land was potentially subject to residential development.

9. The land outlined on the map attached to the proposal is not all owned by Chorley Council. There are strips of land in private ownership and there are two private residences in this area, one of which is privately owned. The map is therefore misleading to anyone examining the proposal and cannot be used as a basis for making a sound decision on this matter.

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4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? [ ]
5(2): Not justified? [ ]
5(3): Not effective? [ ]
5(4): Not consistent with national policy? [ ]
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

The Council considers the process of arriving at an allocation to be legally compliant and sound.

The Council is committed to making sure that it takes into account the views of everyone in the borough hence the monitoring questions which give a profile of who has submitted representations which allows this to be assessed and inform future consultations. In addition to the representation form the Council has accepted comments by letter and email. A direct link was placed on the homepage of the Council’s website when concerns were raised about the accessibility of the
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The representation form is confusing. Points 4-7 ask specialist questions which the general public are not qualified to answer. You the Council should satisfy yourself that the Preferred Options document is fit for purpose for which it is intended and is legally compliant. Paragraph 182 of the NPPF is meaningless in isolation and is no use in clarifying this question. I do not think it is appropriate for lay people to answer these questions. The confusion inherent in the form is deterring local residents from using it and as a result they could be excluded from a legitimate consultation process. You should review the use of the form forthwith. The Council should satisfy itself on the legality of the documents and publish a new form for the general public to use which allows for comments on the various options which is what most members of the public are interested in.

In addition, what purpose does the attached monitoring questions serve? It is stated that the Council is committed to making sure that it takes into account the views of everyone in the Borough. How does this document contribute towards this aim? It is a vacuous form that has no place in this exercise. You know who residents are, or should do, so what purpose does this serve? It is a waste of your time and effort as well as Council Tax payers money.

Comments in relation to site:

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direct people to Lower Adlington along Harrison Road and across this bridge and any new residents could also attempt to come this way and damage the bridge.

6. The rainwater drains have historically been a problem in this area, particularly in Crawford Avenue, and any additional paved areas will necessitate connections to the existing infrastructure adding to the load particularly under storm conditions, potentially increasing the likelihood of flooding. Other services such as gas and electricity will also need to be introduced to the site at additional cost.

7. There will be a loss of good productive farmland at a time when the nation requires such land to be used effectively.

8. Such a development will blight surrounding land affecting existing property prices, but also having a potentially adverse impact on any future proposals to develop the land. This would be detrimental to both the Council and Chorley Borough residents in that it would represent a lost opportunity cost for the land in question, if say at some point in the future the land was potentially subject to residential development.

9. The land outlined on the map attached to the proposal is not all owned by Chorley Council. There are strips of land in private ownership and there are two private residences in this area, one of which is privately owned. The map is therefore misleading to anyone examining the proposal and cannot be used as a basis for making a sound decision on this matter.

10. Any change of use of this land could lead to the loss of an amenity area. The current public footpath across the land is widely used by both local residents and people from farther afield. Local people walk, cycle, walk their dogs often with families and exercise horses. Many others use it as a route on longer distance walks and cycle journeys. This is an excellent asset to the Borough which would be threatened by the proposal. Many people would cease to use it for the above uses because of the proximity of such a development which would make it a less attractive route through to the canal towpath which is also used by many people.

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared?  

5(2): Not justified?  

5(3): Not effective?  

5(4): Not consistent with national policy?

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?  Yes

9: Reason participation necessary

I am not seeking a change. However I do wish to be a legitimate part of the local planning process, and be aware of issues raised and views presented in this case.

Councils response

The Council considers the process of arriving at an allocation to be legally compliant and sound.

The Council is committed to making sure that it takes into account the views of everyone in the borough hence the monitoring questions which give a profile of who has submitted representations which allows this to be assessed and inform future consultations.

Harrison's Farm is allocated as an area of land safeguarded for future development
needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

Trees are protected under Chorley Local Plan 2012-2026 - policies BNE1 - Design Criteria for New Development and BNE9 - Trees.

The Council considers that actual or perceived impact on property value is not a material planning consideration.

It is recognised that not all of the land is in Council ownership hence the expression 'predominantly in Chorley Council ownership'. The site is 11.8ha in total. Part of the site is allocated for allotments and a cemetery extension. Of the remaining land the Council own 7.9ha, therefore the site could be delivered on Council owned land.

United Utilities have provided further information on this site and state 'Foul and clean water pipes run through the site, therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree. We would seek the disposal of surface water via the nearest watercourse (or should this be demonstrated as not feasible, through other sustainable means). The location of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure.'

Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
We wish to submit the following points in objection to the above proposal:

1. Access to the site is via Park Road, The Common and Old School Lane. Access is already difficult in a car and more so in a larger vehicle because of parked cars. Park Road is already seriously overloaded with parked cars and traffic presenting a nuisance and a hazard for vehicles travelling to and from the A6. Every resident or visitor to this area must travel down this road and negotiate the parked cars. Access for emergency service vehicles is already difficult.

2. Any increase in traffic should be avoided, particularly vehicles such as large trailers and caravans.

3. The Park Road area has been a '20 is plenty' zone with speed bumps for several years. We assume this was implemented to mitigate danger to pedestrians. This was a factor in the recent decision not to create allotments on The Common.

4. The left bend from Old School Lane into the access to Harrison's Farm is narrow and tight with a Grade II listed building located on the inside corner.

5. Access to the site via Harrison Road involves negotiation of a narrow, steep Grade II listed bridge over the canal which has already suffered damage from passing traffic.

6. Surface water drainage in the Crawford Avenue area has historically been a problem. Any additional paved area will exacerbate the situation.

7. Utilisation of this site will result in the loss of productive farmland. This fact would not apply if the site chosen were to be a brownfield site.

8. The development of this site in the proposed manner will have a detrimental effect on surrounding residential property prices. This has the potential for reduction in revenue from Council Tax.

9. The plan attached to the proposal outlining the proposed site is flawed in as much as it encompasses two privately owned areas which contain dwellings. This is misleading to anyone examining the proposal.

10. Any change of use of this land will lead to the loss of an important amenity area, of which Lower Adlington already has a dearth. The current right of way past Harrison's Farm is well used by walkers, cyclists and horse riders travelling in both directions to reach the canal towpath and Jubilee Park in one direction and Common End and the woods beyond in the other direction. Such use would be detrimentally affected by the proximity to the Gypsy/Traveller site.
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination? Yes
9: Reason participation necessary To raise objection to the proposal.

Councils response

The Council considers the process of arriving at an allocation to be legally compliant and sound.

The Council is committed to making sure that it takes into account the views of everyone in the borough hence the monitoring questions which give a profile of who has submitted representations which allows this to be assessed and inform future consultations.

Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

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Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
I am writing regarding the proposed site for the Gypsies in Adlington. I am very much against this proposal. I have lived in Adlington all my life and on The Common for 47 years. We have over the years seen many changes in Adlington not all for the good of the village but this latest proposal which seemed to come from nowhere has caused much anxiety amongst many of the residents particularly the elderly.

Objection noted.

Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
The representation form is confusing. Points 4-7 ask specialist questions which the general public are not qualified to answer. You the Council should satisfy yourself that the Preferred Options document is fit for purpose for which it is intended and is legally compliant. Paragraph 182 of the NPPF is meaningless in isolation and is no use in clarifying this question. I do not think it is appropriate for lay people to answer these questions. The confusion inherent in the form is deterring local residents from using it and as a result they could be excluded from a legitimate consultation process. You should review the use of the form forthwith. The Council should satisfy itself on the legality of the documents and publish a new form for the general public to use which allows for comments on the various options which is what most members of the public are interested in.

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7: Necessary changes
8: Participate in examination?
9: Reason participation necessary
Councils response

The representation form and guidance notes provides information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning Policy Framework. In addition to this form the Council has accepted comments by letter and email. A direct link was placed on the homepage of the Council’s website when concerns were raised about the accessibility of the information. The Council also made an online consultation form available through Survey Monkey. The Council considers the process of arriving at an allocation to be legally compliant and sound.
It is standard practice to include a monitoring questions form with any Council representation form. The Council is committed to making sure that it takes into account the views of everyone in the borough hence the monitoring questions which give a profile of who has submitted representations which allows this to be assessed and inform future consultations.

Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

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The Council considers that actual or perceived impact on property value is not a material planning consideration.

It is recognised that not all of the land is in Council ownership hence the expression 'predominantly in Chorley Council ownership'. The site is 11.8ha in total. Part of the site is allocated for allotments and a cemetery extension. Of the remaining land the Council own 7.9ha, therefore the site could be delivered on Council owned land.

United Utilities have provided further information on this site and state 'Foul and clean water pipes run through the site, therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree. We would seek the disposal of surface water via the nearest watercourse (or should this be demonstrated as not feasible, through other sustainable means). The location of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure.'

Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
1: Evidence why available/ suitable/ achievable? Not suitable - Green Belt land with lots of wildlife. If not Green Belt it should be.

2: Agree with preferred site? Yes

3: Comments on document

The representation form is confusing. Points 4-7 ask specialist questions which the general public are not qualified to answer. You the Council should satisfy yourself that the Preferred Options document is fit for purpose for which it is intended and is legally compliant. Paragraph 182 of the NPPF is meaningless in isolation and is no use in clarifying this question. I do not think it is appropriate for lay people to answer these questions. The confusion inherent in the form is deterring local residents from using it and as a result they could be excluded from a legitimate consultation process. You should review the use of the form forthwith. The Council should satisfy itself on the legality of the documents and publish a new form for the general public to use which allows for comments on the various options which is what most members of the public are interested in.

In addition, what purpose does the attached monitoring questions serve? It is stated that the Council is committed to making sure that it takes into account the views of everyone in the Borough. How does this document contribute towards this aim? It is a vacuous form that has no place in this exercise. You know who residents are, or should do, so what purpose does this serve? It is a waste of your time and effort as well as Council Tax payers money.

Comments in relation to site:

1. Access to the site is via Park Road, The Common and Old School Lane. Access is already difficult in a car and more so in a larger vehicle because of parked cars. Park Road is already seriously overloaded with parked cars and traffic presenting a nuisance and a hazard for vehicles travelling to and from the A6. Every resident or visitor to this area must travel down this road and negotiate the parked cars. Access for emergency service vehicles is already difficult.

2. Any increase in traffic must be avoided, particularly large trailers, large caravans and the like. Because of the frequent need to pull into a small gap and wait to let other vehicles through, there are times when it would be impossible to get these types of vehicles down these roads because of parked vehicles.

3. The Park Road area has been a '20 is plenty' zone with speed humps for some years reflecting existing concerns regarding traffic in a residential area. Any increase in traffic through Park Road would have significant impact on risks to people from traffic. This was a factor in the recent decision not to create allotments near The Common.

4. Old School Lane is a quiet residential road and the turning left from it into the access to Harrison's Farm is a tight corner and not suitable for large vehicles. There is a Grade II listed building located on the inside corner further restricting the scope for improvement of the access.

5. The canal bridge at Red House is a Grade II listed structure. Access to Harrison's Farm across this bridge is restricted as the bridge is narrow and steep and has already been damaged by vehicles attempting to cross. Satellite navigation systems frequently
direct people to Lower Adlington along Harrison Road and across this bridge and any new residents could also attempt to come this way and damage the bridge.

6. The rainwater drains have historically been a problem in this area, particularly in Crawford Avenue, and any additional paved areas will necessitate connections to the existing infrastructure adding to the load particularly under storm conditions, potentially increasing the likelihood of flooding. Other services such as gas and electricity will also need to be introduced to the site at additional cost.

7. There will be a loss of good productive farmland at a time when the nation requires such land to be used effectively.

8. Such a development will blight surrounding land affecting existing property prices, but also having a potentially adverse impact on any future proposals to develop the land. This would be detrimental to both the Council and Chorley Borough residents in that it would represent a lost opportunity cost for the land in question, if say at some point in the future the land was potentially subject to residential development.

9. The land outlined on the map attached to the proposal is not all owned by Chorley Council. There are strips of land in private ownership and there are two private residences in this area, one of which is privately owned. The map is therefore misleading to anyone examining the proposal and cannot be used as a basis for making a sound decision on this matter.

10. Any change of use of this land could lead to the loss of an amenity area. The current public footpath across the land is widely used by both local residents and people from farther afield. Local people walk, cycle, walk their dogs often with families and exercise horses. Many others use it as a route on longer distance walks and cycle journeys. This is an excellent asset to the Borough which would be threatened by the proposal. Many people would cease to use it for the above uses because of the proximity of such a development which would make it a less attractive route through to the canal towpath which is also used by many people.

**Councils response**
The Council considers the process of arriving at an allocation to be legally compliant and sound.
The Council is committed to making sure that it takes into account the views of everyone in the borough hence the monitoring questions which give a profile of who has submitted representations which allows this to be assessed and inform future consultations.
Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26,
therefore the principal of future development is established. Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

Trees are protected under Chorley Local Plan 2012-2026- policies BNE1 - Design Criteria for New Development and BNE9 - Trees. The Council considers that actual or perceived impact on property value is not a material planning consideration.

It is recognised that not all of the land is in Council ownership hence the expression 'predominantly in Chorley Council ownership'. The site is 11.8ha in total. Part of the site is allocated for allotments and a cemetery extension. Of the remaining land the Council own 7.9ha, therefore the site could be delivered on Council owned land.

United Utilities have provided further information on this site and state 'Foul and clean water pipes run through the site, therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree. We would seek the disposal of surface water via the nearest watercourse (or should this be demonstrated as not feasible, through other sustainable means). The location of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure.'

Harrison's Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
We would like to register our extreme objections to the plans to provide Travellers with the access to the above site. We feel they could cause deep concern for other residents who live close by. Also, once they realise that Red House Bridge leads to the site, Harrison Road will see an increase of vehicles, not something we need.

Please can you provide information regarding the following:

1. How will the Travellers get water?
2. How will they dispose of their rubbish and toilet waste?
3. Will they use electricity or generators?
4. Who will provide and pay for these services?
5. Will it be coming from our Council Tax payments?
6. If the latter, will we be getting a reduction in our rates?

We have worked so hard and paid our way over the years but feel now, as pensioners, we are still having to pay. We sincerely hope you can pass on our reservations at a Council meeting that will, in the end, reject the plan to turn the site into a Travellers site.

Objection noted. Services - electricity, water and sewage - would have to be secured as part of any planning application. The residents would be able to avail of council services in respect of rubbish collection.

The Council considers that actual or perceived impact on property value is not a material planning consideration.

There are a number of delivery models currently being considered. In terms of the impact upon the public purse or taxpayer in allocating a site, the Council is charged with assessing the objectively met needs of its area, which includes the needs of Gypsies & Travellers. The model for delivery could be a Council owned and managed site, or a private site. The Council may be eligible for grant funding. However, the prospect of achieving funding of a site per se by the Council or any party, including the
potential for grant funding, is a matter that may be relevant to the deliverability of a proposed allocation in a development plan document. Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
8. Harrison's Farm

1. Access to the site is via Park Road, The Common and Old School Lane. Access is already difficult in a car and more so in a larger vehicle because of parked cars. Park Road is already seriously overloaded with parked cars and traffic presenting a nuisance and a hazard for vehicles travelling to and from the A6. Every resident or visitor to this area must travel down this road and negotiate the parked cars. Access for emergency service vehicles is already difficult.

2. Any increase in traffic must be avoided, particularly large trailers, large caravans and the like. Because of the frequent need to pull into a small gap and wait to let other vehicles through, there are times when it would be impossible to get these types of vehicles down these roads because of parked vehicles.

3. The Park Road area has been a '20 is plenty' zone with speed humps for some years reflecting existing concerns regarding traffic in a residential area. Any increase in traffic through Park Road would have significant impact on risks to people from traffic. This was a factor in the recent decision not to create allotments near The Common.

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6. The rainwater drains have historically been a problem in this area, particularly in Crawford Avenue, and any additional paved areas will necessitate connections to the existing infrastructure adding to the load particularly under storm conditions, potentially increasing the likelihood of flooding. Other services such as gas and electricity will also need to be introduced to the site at additional cost.

7. There will be a loss of good productive farmland at a time when the nation requires such land to be used effectively.

8. Such a development will blight surrounding land affecting existing property prices, but also having a potentially adverse impact on any future proposals to develop the land. This would be detrimental to both the Council and Chorley Borough residents in that it would represent a lost opportunity cost for the land in question, if say at some point in the future the land was potentially subject to residential development.

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misleading to anyone examining the proposal and cannot be used as a basis for making a sound decision on this matter.

10. Any change of use of this land could lead to the loss of an amenity area. The current public footpath across the land is widely used by both local residents and people from farther afield. Local people walk, cycle, walk their dogs often with families and exercise horses. Many others use it as a route on longer distance walks and cycle journeys. This is an excellent asset to the Borough which would be threatened by the proposal. Many people would cease to use it for the above uses because of the proximity of such a development which would make it a less attractive route through to the canal towpath which is also used by many people.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? □
5(2): Not justified? □
5(3): Not effective? □
5(4): Not consistent with national policy? □
6: Reasons not legally compliant/unsound
I do not feel that I have enough knowledge and professional training to answer questions 4, 5, 6 and 7.

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

Councils response

Harrison's Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.
Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken in cooperation with English Heritage. It is considered that this bridge would not be a suitable access.
Trees and general amenity are protected under Chorley Local Plan 2012-2026 policies BNE1 - Design Criteria for New Development and BNE9 - Trees.
The Council considers that actual or perceived impact on property value is not a material planning consideration.
It is recognised that not all of the land is in Council ownership hence the expression 'predominantly in Chorley Council ownership'.
United Utilities have stated 'Foul and clean water pipes run through the site, therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree.
We would seek the disposal of surface water via the nearest watercourse (or should this be demonstrated as not feasible, through other sustainable means). The location of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure.'
Harrison's Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
I am writing in protest of the possibility of you going ahead with this project. It is the top end of a bottle neck situation i.e. traffic up Park Road. You have already robbed us of two sites and built houses on Acresfield. Please leave us alone on this occasion.

Objection noted.

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken in cooperation with English Heritage. It is considered that this bridge would not be a suitable access. Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
Object to Harrison’s Farm as one of the preferred options for a permanent Gypsy, Traveller and Travelling Showpeople site.

I strongly object to including this site as any additional traffic on Park Road would add to the chaos and cause an adverse impact. Parking adjacent to the terraced houses makes the road a single track most of the time. Should there be an accident blocking Park Road there is no emergency exit for larger vehicles including fire engines etc.

Many residents use Old School Lane and Harrison’s Farm track as an access route to the canal tow path and the park, as it stands this is a care free walk where it is safe for children to walk on ahead in a country setting, again any increase in traffic would take away this pleasure.

There are a number of historic borrow pits in the vicinity of the site. The majority are unrecorded on the historical maps as they were excavated and backfilled with the waste between map revisions, however this was common practice at the bottom of Adlington where sand was extracted.

I trust my objection will be put before the Planning Committee.

Councils response

Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established. Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

Comments noted. Chorley Local Plan 2012-26 Policy BNE7: Unstable Land would ensure that any application on unstable or potentially unstable land was accompanied by a stability report identifying the relevant issues and how they could be overcome.
The Coal Authority submitted representations requesting some changes to be made to the document. They identified that this site has been subject to coal mining which has left a legacy of unstable land which will need to be assessed and appropriate remedial works undertaken prior to site occupation. The requested additional text has been added to the site assessment.

Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
8. Harrison’s Farm

I believe the Harrison’s Farm site is inappropriate for development due to the following reasons:

1. It is already proposed to use this site for extension to the local cemetery/allotments.
2. Development of the road via Park Road/School Lane etc. to access the site is inappropriate in costs, safety to users and adds to already congestion problems.
3. Part of the land is privately owned.
4. Disruption to country pathways.

Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26. Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

It is recognised that not all of the land is in Council ownership hence the expression 'predominantly in Chorley Council ownership'. The site is 11.8ha in total. Part of the site is allocated for allotments and a cemetery extension. Of the remaining land the Council own 7.9ha, therefore the site could be delivered on Council owned land.

Chorley Local Plan Policy ST1: New Provision or Improvement of Footpaths, Cycleways, Bridleways and their associated facilities in existing networks and new development would ensure that pathways are protected.

Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
I feel I must object to the inclusion of the above site in your consultation, a number of reasons occur to me in this regard which I hope you will consider:

1. Firstly is access to the site, this will be only via Park Road, The Common and Old School Lane. This route is severely restricted for normal motor vehicles let alone large HGV lorries with 40 foot and more trailers. These highways are currently overcrowded and obstructed with parked vehicles which cause many hazards to passing and repassing vehicles including the emergency services. Your traffic department must already be aware of these facts since traffic calming measures were introduced some time ago with a twenty mile per hour speed limit. I am afraid that increasing the traffic along this route would constitute a further danger to residents and the school children that use this way five days a week. I understand that excess traffic was a major factor in rejecting the decision to create allotments in this area. The part through Old School Lane in parts could be widened to create more space for large vehicles via a grass verge, this would require the moving of street lighting/furniture and drains at significant extra cost to Chorley ratepayers. The left turn into the said lane is used as a reversing/turning area for the local buses, although infrequent, this would cause further hazard and the left turn at Old School House is very narrow with a Grade II listed structure on the inside including the perimeter wall. The land at this junction is now 4.6 metres wide, with a field gate and access to a public footpath on the right which leads to the Douglas Valley Way walking route. This would make access with a HGV with trailer nigh on impossible. I also note that no pedestrian pavement is available there, just after the junction with Crawford Avenue. The only other access to the site is via Red House Bridge at the end of Harrison Road. A Grade II listed structure totally unsuitable for vehicular access. This bridge has been damaged in the past and I am sure that British Waterways will confirm these facts for you with regard to traffic.

2. The use of this area would cause the loss of valuable agricultural land when we need all we get with an expanding population and a Traveller park is not effective use of this land.

3. The amenity value of the area and its environs cannot be overstressed, with horse riders, walkers and ramblers, cyclists and dog walkers with families using it and an unsightly site, for that is what I fear it will become, will deter Chorley residents from using it in the future by making an unattractive passage to the canal towpath. I note that Lancashire County Council Highways would object if a cycle/walking path was not linked to the Leeds/Liverpool towpath to meet up with Park Road, to encourage school journeys by sustainable modes of transport, are you proposing to illuminate this section of the towpath in winter time or will you consider it is safe enough for unaccompanied children to negotiate in the dark on a cycle, with icy puddles along most of the path and ropes from tied up water craft encroaching onto the path, causing further hazards?

3. The drainage to the area in question is also suspect and needs some upgrading, a further tax on residents of the Borough. Some areas of Crawford Avenue that abuts the proposed site have had problems with drainage, with floods at times of heavy rain,
a feature of our weather that seems to occur more often these days. The provision of services and hard standing would incur considerable cost on an already cash strapped Council and I fear that it is not currently included in the Council budget and would fall once again on us, the rate payer and I suspect that the costs could be greatly reduced by using one of the other proposed sites.

4. The map that the Council has been distributing via their offices and via electronic means is flawed, it shows areas of land not belonging to the Borough, as a consequence this cannot be used by lay people to make a decision on the proposal.

5. Also your representation form distributed as above is asking for planning decisions that are far beyond the average residents' scope of understanding. Your monitoring questionnaire, I am not sure what value it represents in assessing equality and so I have not returned this, but I feel that at Q5 the submission is not properly prepared, not justified, not effective and not consistent with national policy in that only Chorley and Preston have been considered and this is supposed to be a site for Travellers. It cannot be legally compliant if you are issuing incorrect documents and National Planning Policy Framework documents have not been issued, so I have no reason to consider the proposal sound or not.

6. Policy E says that sites within Green Belt are inappropriate and should not be approved and Harrison’s Farm is Green Belt with a current designation of Safeguarded Land BNE3.2.

I hope you take some of these points into consideration.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? ✓
5(2): Not justified? ✓
5(3): Not effective? ✓
5(4): Not consistent with national policy?
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

Harrison’s Farm is not Green Belt land. Rather it is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

Trees and general amenity are protected under Chorley Local Plan 2012-2026 policies BNE1 - Design Criteria for New Development and BNE9 - Trees.

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We would seek the disposal of surface water via the nearest watercourse (or should this be demonstrated as not feasible, through other sustainable means). The location
of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure.

It is recognised that not all of the land is in Council ownership hence the expression 'predominantly in Chorley Council ownership'. The site is 11.8ha in total. Part of the site is allocated for allotments and a cemetery extension. Of the remaining land the Council own 7.9ha, therefore the site could be delivered on Council owned land. The Council is committed to making sure that it takes into account the views of everyone in the borough hence the monitoring questions which give a profile of who has submitted representations which allows this to be assessed and inform future consultations.

Harrison's Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
The land outlined on the map attached to the proposal is not all owned by Chorley Council. There are strips of land in private ownership, and there are two private residencies in this area, one of which is privately owned. The map is therefore misleading to anyone examining the proposal and cannot be used as a basis for making a sound decision on this matter.

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<th>Rep No</th>
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<th>087</th>
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**Title:** Mr & M  
**First Name:** A & B M  
**Last Name:** Hazlehurst  
**Organisation:**

**Site/location**  
8. Harrison's Farm

**Paragraph/section**

**Modification**

1: Evidence why available/suitable/achievable?

2: Agree with preferred site?

3: Comments on document  
We are writing to put in our objections to this proposal. Harrison Road - The Common is not a suitable site for a Gypsy site, this is a large residential area, the doctors, schools and other services are already oversubscribed. Travellers moving into the area would cause a lot of social problems.

4(1): Legally compliant?

4(2): Sound?

5(1): Not positively prepared?  
☐

5(2): Not justified?  
☐

5(3): Not effective?  
☐

5(4): Not consistent with national policy?

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination?

9: Reason participation necessary

**Councils response**  
Harrison's Farm is not Green Belt land. Rather it is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

Harrison's Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
1: Evidence why available/suitable/achievable?

This site at Harrison's Farm is totally unsuitable.

2: Agree with preferred site?

The representation form is confusing. Points 4-7 ask specialist questions which the general public are not qualified to answer. You the Council should satisfy yourself that the Preferred Options document is fit for purpose for which it is intended and is legally compliant. Paragraph 182 of the NPPF is meaningless in isolation and is no use in clarifying this question. I do not think it is appropriate for lay people to answer these questions. The confusion inherent in the form is deterring local residents from using it and as a result they could be excluded from a legitimate consultation process. You should review the use of the form forthwith. The Council should satisfy itself on the legality of the documents and publish a new form for the general public to use which allows for comments on the various options which is what most members of the public are interested in.

In addition, what purpose does the attached monitoring questions serve? It is stated that the Council is committed to making sure that it takes into account the views of everyone in the Borough. How does this document contribute towards this aim? It is a vacuous form that has no place in this exercise. You know who residents are, or should do, so what purpose does this serve? It is a waste of your time and effort as well as Council Tax payers money.

Object for the following reasons:

1. There are only 2 access points to the site. One of them, Red House Canal Bridge No 68 is a listed structure and is incapable of accommodating large vehicles and caravans and fairground equipment. That only leaves Park Road and The Common. Access along Park Road is already extremely difficult mainly due to parked cars. Every resident or visitor must use this road to gain access to the A6. At some time in the recent past this road was considered so dangerous by the Highways Authority that a 20mph speed limit was imposed along with many speed calming measures. On 21st June 2014, I contacted Chorley Council and was promised a reply by 4th July. I asked for a copy of the report that deemed Park Road to be so dangerous and still await a reply.

2. Residents and visitors facilitate the free movement of vehicle by the courteous pulling into small gaps to allow vehicles to pass. This will be increasingly difficult if not impossible with lorries pulling caravans.

3. Old School Lane is a quiet residential road and turning left from it into Harrison's Farm is unsuitable for large vehicles and trailers. On the corner is a listed building, The Old School House built in 1815.

4. The existing rainwater drains in Crawford Avenue are at a maximum usage and any additional paved areas will only exacerbate the problem, possibly leading to flooding.

5. The site at Harrison's Farm is protected land within a Green Belt context. Even I know what protected means. Furthermore the land at this site is still productive and in constant use.
6. The map outlined in the proposal is misleading as some of the area is in private ownership making the map unsafe to make judgements thereon.

7. Any change of use would be a severe loss of amenity area. The current footpath across the land is widely used by residents, ramblers, cyclists, dog walkers and horse riders. The footpath gives ready access to the towpath of the nearby Leeds and Liverpool canal. Canals are coming to prominence in recent years and considerable sums of money are being spent on upgrading and recommissioning many canals. A Gypsy and Traveller site would be extremely detrimental.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared?
5(2): Not justified?
5(3): Not effective?
5(4): Not consistent with national policy?
6: Reasons not legally compliant/unsound
I am not qualified to judge the legality of this document.
7: Necessary changes
I am not qualified to judge the legality of this document.
8: Participate in examination?
Yes
9: Reason participation necessary
I wish to make objections to Harrison's Farm being suitable for this proposal.

Councils response

The representation form and guidance notes provides information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning Policy Framework. In addition to this form the Council has accepted comments by letter and email. A direct link was placed on the homepage of the Council’s website when concerns were raised about the accessibility of the information. The Council also made an online consultation form available through Survey Monkey. The Council considers the process of arriving at an allocation to be legally compliant and sound. It is standard practice to include a monitoring questions form with any Council representation form. The Council is committed to making sure that it takes into account the views of everyone in the borough hence the monitoring questions which give a profile of who has submitted representations which allows this to be assessed. Harrison's Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

Trees are protected under Chorley Local Plan 2012-2026- policies BNE1 - Design Criteria for New Development and BNE9 - Trees.

The Council considers that actual or perceived impact on property value is not a material planning consideration.

It is recognised that not all of the land is in Council ownership hence the expression 'predominantly in Chorley Council ownership'. The site is 11.8ha in total. Part of the site is allocated for allotments and a cemetery extension. Of the remaining land the Council own 7.9ha, therefore the site could be delivered on Council owned land. United Utilities have stated 'Foul and clean water pipes run through the site, therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree.

We would seek the disposal of surface water via the nearest watercourse (or should
this be demonstrated as not feasible, through other sustainable means). The location of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure.'

Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
I write to express my deep concern of this site being used for a Gypsy and Traveller and Travelling Showpeople site. Having lived in Adlington my whole life, I find it hard to believe that a small residential area at the lower end of Adlington is being subjected to this proposal. I have detailed my concerns below:

Park Road has parked cars on both sides of the road making passing extremely difficult and congested at busy periods of the day. Satellite navigation systems often send many heavy goods vehicles the wrong route down Park Road, The Common and Old School Lane and unless you are a resident in the area you have no idea the amount of congestion and problems this causes particularly when people are trying to get to work. How on earth can this road be considered safe for further traffic?

The fields which you show on your map are home to an extensive range of wildlife, we have seen deer, pheasants, foxes and a vast variety of birds and insects. The area is an unspoilt beauty spot which is used by most of the local residents as they exercise, walk their dogs and enjoy time with their children. Surely in this day and age when so much wildlife is becoming non-existent a local Council should be striving to protect it. I strongly believe a change in purpose for this land would destroy not only the wildlife but the local community spirit.

Local people are all appalled by this proposal and hope and pray that the Council will consider one of the other proposed sites that are not home to such rare wildlife and more easily accessible by main roads which are better equipped to deal with Gypsy and Traveller Showpeople.

Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II
listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria f) protects important natural habitats and landscape features such as mature trees and hedgerows. Policy BNE9: - Trees also protects trees. Policy BNE11 gives priority to the in situ conservation of protected species which can often be achieved through careful design, landscaping, timing and method of development.

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Park Road, I consider this road to be an accident waiting to happen due to the amount of traffic. Parked cars on both sides of the road make passing extremely difficult and congested at busy periods of the day. How on earth can this road cope with more traffic?

The fields which you show on your map are home to an extensive range of wildlife, my children have been blessed with being able to see deer, pheasants, foxes and a vast variety of birds and insects. The area is an unspoilt beauty spot which is used by most of the local residents as they exercise, walk their dogs and enjoy time with their children. Lancashire County Council are striving to improve their schools by improving education. I believe a change in purpose for this land would destroy not only the wildlife but the local community spirit.

Myself, family and neighbours are all appalled by this proposal and hope and pray that the Council will consider one of the other proposed sites that are not home to such rare wildlife and more easily accessible by main roads which are better equipped to deal with Gypsy and Traveller Showpeople.

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I am unable to complete the representation form as it is extremely misleading and I do not consider it appropriate for completion. I wish to express my objection to this site being used for this purpose and detail my reasons below:

- The sites main access would have to be via Park Road, as the alternative you mention via Harrison Road is over a small grade II listed bridge that is unsuitable for vehicles of this nature. Park Road has been deemed unsafe in the past and has warranted a 20mph speed restriction and costly speed bump to be installed in an attempt to reduce the risk to both pedestrians and traffic. How on earth then can this road that is already to maximum capacity cope with more traffic and particularly the heavy goods type that Gypsy and Traveller and Travelling Showpeople would attract.

- My house is located directly in front of the grass verge that is mentioned could be widened. I have reported on several occasions now the inadequate drain that floods causing a big dip in the road. Again how can a road that is unable to cope with a very low level of traffic stand the weight of heavy goods vehicles?

- Rainwater drains in the area have historically been a problem, particularly on Old School Lane and Crawford Avenue, any additional paved areas will necessitate connections to the existing infrastructure adding to the load particularly under storm conditions. This would increase the likelihood of flooding.

- Not all the land that is indicated on the map on the consultation document is owned by the Council, I feel this makes the consultation document invalid as the correct information has not been supplied. How can decisions be reached when presented with inaccurate information, I can only assume a legal opinion would need to be sought on this if this site was pursued further?

- Having ongoing communication with the Environment Agency regarding the inadequate sewage system that is currently in place, which overspills into the River Douglas. I have grave concerns as to how adding more waste to this will impact on the local environment. The local area is currently heavily populated with owls, bats, hares, deer, foxes and pheasants, many of which are occupying the land you wish to develop.

- I have paid a price to live in the area that I live, how can it be justifiable that people who have contributed to the their local Council and Government over many years be subjected to their property prices falling.

- The public footpaths and unadopted roads around this area used frequently by walkers, cyclists, runners and people generally enjoying quality family time together in a natural beauty spot. To what lengths will Chorley Borough Council go to keep people cooped up in homes as they have no local beauty spots to enjoy.
The representation form and guidance notes provide information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning Policy Framework. In addition to this form the Council has accepted comments by letter and email. The Council considers the process of arriving at an allocation to be legally compliant and sound.

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United Utilities have commented that: Foul and clean water pipes run through the site, therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree.

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<td>Councils response</td>
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It is standard practice to include a monitoring questions form with any Council representation form. The Council is committed to making sure that it takes into account the views of everyone in the borough hence the monitoring questions which give a profile of who has submitted representations which allows this to be assessed.

Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

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We would seek the disposal of surface water via the nearest watercourse (or should this be demonstrated as not feasible, through other sustainable means). The location of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure.

Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
Four of the eight alternative sites have been subjected to coal mining which has left a legacy. Sites 4 (recorded mine entry); Site 5, 8 and 9 (probable shallow coal mining).

Whilst these coal mining hazards would not deem these sites to be automatically unsuitable; should the preferred site not be taken forward and an alternative site chosen, these risks should be identified as part of each of the sites constraints.

In relation to Site 8 there is no indication that site remediation will be required even though our information confirms that coal mining legacy may have led to ground instability.

Change requested – Site Information and Site Appraisal (Site 8 Safeguarded Land BNE3.2 Harrison's Farm, Adlington) - Contamination: "No known contamination issues. There is low likelihood of any potential contamination." Add the following text "Former coal mining activity has left a legacy of unstable land which will need to be assessed and appropriate remedial works undertaken prior to site occupation."

Reason - In accordance with local planning policy BNE7 of the Chorley Local Plan and the NPPF guidance (paras. 109, 120, 121 and 166), this would ensure that the policy that allocates potential development sites identify the necessary remediation or stabilisation prior to development.
The points we would like to make are about traffic on Park Road and Old School Lane. Our house is a listed property and part of our home is on the road side. It is not protected by a footpath at the side of our house and is a great threat to us, if larger vehicles are allowed to pass by.

The bridge (Red House bridge) will not stand larger traffic, so it brings us back to Park Road and Old School Lane. Also rainwater drains have been another problem in this area. We are both against any Gypsy and Traveller and Travelling Showpeople on this site.

Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

English Heritage submitted representations identifying the need for a heritage impact assessment to be undertaken for Harrison’s Farm as it is located in close proximity to a listed building. They agreed that if this work was undertaken they would withdraw their objection. The Council have now prepared a heritage impact assessment for the site in co-operation with English Heritage and they have agreed that mitigation will secure an acceptable relationship between development on the proposed site and the designated heritage asset.

United Utilities have stated ‘Foul and clean water pipes run through the site, therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree.

We would seek the disposal of surface water via the nearest watercourse (or should this be demonstrated as not feasible, through other sustainable means). The location of our existing assets within the site may restrict the layout of the development and/or
make the site unviable as protection measures will need to be agreed for our infrastructure."
Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
Title: Ms
First Name: Mollie
Last Name: Hoole
Organisation: 

Site/location
8. Harrison's Farm

Paragraph/section
Modification
1: Evidence why available/suitable/achievable?
2: Agree with preferred site?
3: Comments on document

Every night I go home, get changed and play with my friends on the fields around Harrison's Farm. Sometimes we look for different types of nature! My birthday was in July 2014 (I was 10) and a lovely present would be for you to let me know that the Gypsy and Travellers site will not be put on our fields.

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared?  □
5(2): Not justified?  □
5(3): Not effective?  □
5(4): Not consistent with national policy?  □
6: Reasons not legally compliant/unsound
7: Necessary changes
8: Participate in examination?
9: Reason participation necessary

Councils response
Harrison's Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.
Local Plan Policy BNE11 (2012 -2026) gives priority to the in situ conservation of protected species which can often be achieved through careful design, landscaping, timing and method of development.
Harrison's Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison's Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
Please find enclosed my representation form which I'm afraid I can only fill in the front page as it doesn't seem fit for purpose, either the questions appear irrelevant or confusing - points 4-7 especially! So I have put a few points that I would like you to note that could have a bearing on when you come to decide on which site you choose.

We live on Crawford Avenue, Adlington with Harrison's Farm across the field from us, this is at the end of The Common an already very busy road and cul-de-sac. Here are my points I would like you to consider with having Harrison's Farm as one of the preferred options you have listed as a site:

Access is via park Road, The Common and Old School Lane, already difficult for a car because of parked vehicles. This is already a 20mph zone with speed humps.
- The only other access is the narrow Grade II listed bridge at the end of Harrison Rd at Red House (this is damaged now following a vehicle hitting it).
- The site is worked farmland with much demand for this compared to other sites which lie unused.
- Not all the land outlined is Council owned on the drawing leading to confusion as to where or what land could be used.
- The wildlife, from nesting Owls - Hares, even deer seen in the fields would be lost to this site.
- Access on Old School Lane around the Listed Old School House would have to be addressed at some cost.
- No utilities are nearby, again raising the cost of bringing in the infrastructure.
- Drainage is an issue already without further demand on it.
- Maybe selfishly but the impact on house prices and where we choose to live in a quiet residential cul-de-sac would be changed forever, where we enjoy a very friendly and close neighbourhood spirit.
- Every day no matter what the weather the track around the field down to the canal past Harrison's Farm is used by all ages from mums with prams to pensioners enjoying this bit of countryside, children on bicycles to horse-riding.

Then as now as I write this letter at 8pm the only sound is nature you can hear from outside!
8: Participate in examination?

9: Reason participation necessary

Councils response

The representation form and guidance notes provides information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning Policy Framework. In addition to this form the Council has accepted comments by letter and email. The Council considers the process of arriving at an allocation to be legally compliant and sound.

Harrisons Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

The Council considers that actual or perceived impact on property value is not a material planning consideration.

Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria f) protects important natural habitats and landscape features such as mature trees and hedgerows. Policy BNE9: - Trees also protects trees.

Policy BNE11 gives priority to the in situ conservation of protected species which can often be achieved through careful design, landscaping, timing and method of development.

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United Utilities have stated 'We would seek the disposal of surface water via the nearest watercourse (or should this be demonstrated as not feasible, through other sustainable means). Access to our infrastructure for foul and clean water services may be possible but will require further detailed discussions with United Utilities to agree.'

Harrison's Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
We strongly object to including Harrison's Farm, Adlington, as one of the preferred options for a permanent Gypsy and Traveller site on the following grounds:

Access: The existing access on to Harrison Farm off Park Road and at the end of Old School Lane, is a single track road. Currently there is only light traffic, the occasional tractor / horse box plus the Harrison Farm owner's cars and the people who use the stable facilities. The additional increase in traffic associated with the Gypsy site will increase the risk of collision between vehicles entering and leaving this area. In particular there is a pinch point near to the old school. Widening the road at this section would encroach on a mature oak tree's protected root zone. Those of you who know the area will appreciate the oak trees along Old School Lane provide habitats of great bio-diversity including owls and bats.

Furthermore, the additional traffic generated by the Gypsy site would greatly exceed the tracks design capacity. In particular where the track unsealed, the road will become rutted and no doubt will become dangerous to walk and drive down. Many of the residents from the bottom of Adlington use School Lane & Harrison Farm track as an access route to the canal and to Harrison Road, then on to the main road. As it stands, this is a 'care free' walk, where it is safe for young children to walk on ahead, in a country setting. Again, the increase traffic would take away this amenity.

Prior to getting to Old School Road, the additional traffic would have to come along Park Road. The parking along this road, in particular adjacent to the terrace houses, turns this road into a dangerous single lane. More often than not, cars park on the footpaths to create more space on the road. We personally have been forced to walk on the road where cars have taken up the majority of the footpath. The size of the caravans likely to be used by the residents of the proposed site will without doubt add to the danger and have an adverse impact.

As it stands, being a no-through road very few HGV type vehicles use this road. Nevertheless, when they have entered (in most instances when they have gone the wrong way), there is absolute mayhem. Similar to that described above, the size of the caravans likely to be used by the residents of the proposed site will add to the problem.

On Park Road, tension is often expressed between motorist when they are forced to wait a significant amount of time before they can pass. I am also aware that numerous cars have been damaged, wing mirrors knocked off etc., where cars are forced to pass along the narrowed sections of road caused by the parked cars. Park Road already has traffic calming measures, which doesn't really help issues, the additional traffic along this road would just make things much worse.

The approach from Harrison Road isn't any better. Access to the fields on the other side of the canal is via an old stone single carriage road. This bridge hasn't been designed to take the loads created by the caravan traffic. Widening and strengthening the bridge would ruin the aesthetics of the area. Again the road passes through a
residential area where children are often seen playing on the road.

Incorrect Plans: The plans relating to the proposed area are incorrect. There are portions of land / dwellings privately owned and not by the Local Authority as depicted.

Contamination: There are a number of historic borrow pits in the vicinity of the site, i.e. the pond adjacent to Common Farm. The majority are unrecorded on the historical maps as they were excavated and backfilled with waste between map revisions. However, this was common practice at the bottom of Adlington, where sand was extracted.

Although anecdotal, it is local knowledge that the land at the back of Red Brick House was used by local industry to dump their waste. It would be prudent before this site is considered as an option a thorough intrusive investigation is undertaken to determine the extent of any pollution caused by this waste. Similarly, there are disused sewage treatment works within the near vicinity of this site.

We trust our objections will be put before the Planning Committee in due course prior

4(1): Legally compliant?
4(2): Sound?
5(1): Not positively prepared? ☐
5(2): Not justified? ☐
5(3): Not effective? ☐
5(4): Not consistent with national policy? ☐
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Councls response

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The report states that there are no known contamination issues and a low likelihood of contamination, however further checks are needed to confirm this. The representor's views as to the nature of contamination would be verified through ground investigation works that would be undertaken as part of any proposed
allocation and appropriate mitigation measures undertaken. The Coal Authority submitted representations requesting some changes to be made to the document. They identified that this site has been subject to coal mining which has left a legacy of unstable land which will need to be assessed and appropriate remedial works undertaken prior to site occupation. The requested additional text has been added to the site assessment.

Chorley Local Plan 2012-26 Policy BNE7: Unstable Land would ensure that any application on unstable or potentially unstable land was accompanied by a stability report identifying the relevant issues and how they could be overcome.

Harrison's Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
Title: Mrs  First Name: Julie  Last Name: Hatch

Site/location: 8. Harrison’s Farm

Modification

1: Evidence why available/suitable/achievable?

2: Agree with preferred site?

3: Comments on document

I am unable to complete the representation form as it is extremely misleading and I do not consider it appropriate for completion for the above site at this time.

Petition submitted listing the names of local residents (327 people) that are objecting to the site being used for the above purpose for the reasons listed below:

- The site’s main access would have to be via Park Road, as the alternative you mention via Harrison Road is over a small grade II listed bridge that is unsuitable for vehicles of this nature. Park Road has been deemed unsafe in the past and has warranted a 20mph speed restriction and costly speed bump to be installed in an attempt to reduce the risk to both pedestrians and traffic. How on earth then can this road that is already to maximum capacity cope with more traffic and particularly the heavy goods type that Gypsy and Traveller and Travelling Showpeople would attract.

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- Having ongoing communication with the Environment Agency regarding the inadequate sewage system that is currently in place, which overspills into the River Douglas. I have grave concerns as to how adding more waste to this will impact on the local environment. The local area is currently heavily populated with owls, bats, hares, deer, foxes and pheasants, many of which are occupying the land you wish to develop.

- The public footpaths and unadopted roads around this area used frequently by walkers, cyclists, runners and people generally enjoying quality family time together in a natural beauty spot. To what lengths will Chorley Borough Council go to keep people cooped up in homes as they have no local beauty spots to enjoy.

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5(2): Not justified? ☐

5(3): Not effective? ☐

5(4): Not consistent with national policy? ☐
The representation form and guidance notes provides information and questions which cover the legal requirements required under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the guidance in the National Planning Policy Framework. In addition to this form the Council has accepted comments by letter and email. The Council considers the process of arriving at an allocation to be legally compliant and sound.

It is standard practice to include a monitoring questions form with any Council representation form. The Council is committed to making sure that it takes into account the views of everyone in the borough hence the monitoring questions which give a profile of who has submitted representations which allows this to be assessed. Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

Trees are protected under Chorley Local Plan 2012-2026- policies BNE1 - Design Criteria for New Development and BNE9 - Trees.

The Council considers that actual or perceived impact on property value is not a material planning consideration.

It is recognised that not all of the land is in Council ownership hence the expression 'predominantly in Chorley Council ownership'. The site is 11.8ha in total. Part of the site is allocated for allotments and a cemetery extension. Of the remaining land the Council own 7.9ha, therefore the site could be delivered on Council owned land.

United Utilities have stated: Foul and clean water pipes run through the site, therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree.

We would seek the disposal of surface water via the nearest watercourse (or should this be demonstrated as not feasible, through other sustainable means). The location of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure.

Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
Title: Mrs  First Name: Julia  Last Name: Mather  Organisation: 

Site/location: 8. Harrison's Farm

Paragraph/section: Modification

1: Evidence why available/suitable/achievable?  
2: Agree with preferred site? Yes

3: Comments on document
The road is busy enough. We have allocated parking but people still park on the side of road. The road isn't wide and this causes obstruction to transport going to the Company's. Also the bridge which has access to this field is very narrow and has a weight limit on although there's no signs on it stating so. There's also a few children around this area who play up and down the road. The road is also used re parking for people going for walks and for football teams.

4(1): Legally compliant?
4(2): Sound?

5(1): Not positively prepared?  
5(2): Not justified?  
5(3): Not effective?  
5(4): Not consistent with national policy?  

6: Reasons not legally compliant/unsound

7: Necessary changes

8: Participate in examination? No

9: Reason participation necessary

Councils response:
Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established. Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access. Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
This site is totally unsuitable as a site for Gypsy provision because: 1. Very poor access to the site. Park Road - parking on either side of the road causes traffic problems already. 2. Flooding potential in Crawford Road area. 3. Loss of good productive farmland.

2: Agree with preferred site? Yes

Councils response

Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation. Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access. United Utilities have stated: Foul and clean water pipes run through the site, therefore access to our infrastructure may be possible but will require further detailed discussions with United Utilities to agree. We would seek the disposal of surface water via the nearest watercourse (or should this be demonstrated as not feasible, through other sustainable means). The location of our existing assets within the site may restrict the layout of the development and/or make the site unviable as protection measures will need to be agreed for our infrastructure. Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.
Title: Ms  
First Name: Michelle  
Last Name: Casey  
Organisation:  

| Site/location | 8. Harrison’s Farm |
| Paragraph/section |  
| Modification |  
| 1: Evidence why available/suitable/achievable? | Yes |
| 2: Agree with preferred site? | Yes |
| 3: Comments on document | Harrison Road is a quiet area with a listed 2 bridge which leads to the proposed site. Bridge 68 Red Bridge also only has a less than 3 tonne weight limit. Even if restrictions were put on not to use the bridge who would police it?

The proposed site is also home to a lot of natural/nature which again would be disturbed by this.

There are older people on the road which would be affected by constant stream of traffic which could be generated. |

| 4(1): Legally compliant? | No |
| 4(2): Sound? | No |
| 5(1): Not positively prepared? | No |
| 5(2): Not justified? | No |
| 5(3): Not effective? | No |
| 5(4): Not consistent with national policy? | No |
| 6: Reasons not legally compliant/unsound |  
| 7: Necessary changes |  
| 8: Participate in examination? |  
| 9: Reason participation necessary |  

Councils response

Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

Local Plan Policy BNE11 (2012-2026) gives priority to the in situ conservation of protected species which can often be achieved through careful design, landscaping, timing and method of development. Trees are protected under Chorley Local Plan 2012-2026 - policies BNE1 - Design Criteria for New Development and BNE9 - Trees. Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
<table>
<thead>
<tr>
<th>Site/location</th>
<th>8. Harrison’s Farm</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paragraph/section</td>
<td></td>
</tr>
<tr>
<td>Modification</td>
<td></td>
</tr>
<tr>
<td>1: Evidence why available/suitable/achievable?</td>
<td>Yes</td>
</tr>
<tr>
<td>2: Agree with preferred site?</td>
<td>Yes</td>
</tr>
<tr>
<td>3: Comments on document</td>
<td>I find it absolutely amazing that this site was ever considered as I was duly informed by the Council some years ago that Park Road was totally unsuitable to have even touring caravans on it. This came about because I own some land off Park Road and a planning application was entered on the basis of holding up to six touring caravans in storage for local people who wanted to get them off their drives. All of which lived on housing estates in the Park Road area. After explaining this, appealing and after a site visit by the Council I was allowed to have four caravans stored on the site with numerous rules and criteria - no gas bottles, not to be lived in, no sales from the site. Even though this application was granted it does not get round the fact that I still have the documentation that states Park Road is unsuitable for caravans. It was allowed because of the tiny number of movements per year to and from the site which would have been done anyway to the prospective owners homes. Yet you are now even considering Park Road as an access route for Gypsy/Traveller caravans which are significantly larger and on an overnight basis. Should this planned site go ahead I will be asking for Chorley Borough to reimburse my losses.</td>
</tr>
<tr>
<td>4(1): Legally compliant?</td>
<td></td>
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<tr>
<td>4(2): Sound?</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>8: Participate in examination?</td>
<td>Yes</td>
</tr>
<tr>
<td>9: Reason participation necessary</td>
<td>On the grounds Park Road is inadequate to carry the number of caravans and their size on a daily or 48 hour basis i.e. five caravans is equal to 10 large or long vehicle movements per 48 hours or less.</td>
</tr>
</tbody>
</table>

**Councils response**

Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established. Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access. The Council considers that actual or perceived impact on property value is not a material planning consideration. Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller caravans.
provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
Title: Mr & M  
First Name: Paul & Elaine  
Last Name: Garstang  
Organisation:  

Site/location  
8. Harrison’s Farm  

Paragraph/section  
Modification  

1: Evidence why available/ suitable/ achievable?  
No  

2: Agree with preferred site?  
No  

3: Comments on document  
The LA does not need to consider / provide Traveller sites. Private concerns can apply for the funding to buy and prepare land for these sites.

Complete lack of communication by Chorley Council to advise local residents of the proposals. Local residents had to ‘find out’ from headlines in a local newspaper.

Discrimination against local residents through lack of consultation about their preferred option prior to the preparation of proposal document- preferred options, whilst the Travelling family were asked for their preferred option / wish list months earlier.

4(1): Legally compliant?  
No  

4(2): Sound?  
No  

5(1): Not positively prepared?  

5(2): Not justified?  
✓  

5(3): Not effective?  

5(4): Not consistent with national policy?  

6: Reasons not legally compliant/unsound  
The document is not consistent with National policy which points towards a preference for private applications using private land in preference to Greenfield sites. The L.A. need not consider the provision of sites. There is already a private Gypsy site within the Adlington area.

Social:  
By definition "Travellers" have their own transport so access to local transport and rail networks need not be a major consideration.  
The existing site and others in the proposals are closer to Chorley Town Centre than site 8.  
There are more shops in Chorley than Adlington.  
Adlington does not offer as many employment opportunities as Chorley. Travellers do not seek (permanent) employment in the types of businesses found in Adlington.  
Adlington does not have a secondary school nor does it have the full spectrum of services afforded by Chorley.  
The preferred options document does not comment on the impact of the site on residents.

The potential for noise (caravans are not sound insulated like houses are) in an area that is a popular leisure area for walking by families (often with their pets), generators, use of toilet block at all hours, running of businesses.  
A potential for access over the canal bridge leading to the farm track. An escalation of heavy vehicles traffic down Park Road/The Common pulling large wide caravans that by law should be pulled by large vehicles down a roadway that is often double-parked.
Escalated risk of damage to residents vehicles, and disruption to bus services that will be generated with the escalated risk of friction with local rate paying residents. The site will impact on adjacent homes - visibly with an aspect that is out of keeping with the environs of rural/semi rural well tended and well maintained upper price bracket houses. The decision to propose this site sits at odds with Chorley Council having previously placed restrictions on farms in the immediate vicinity from using and operating heavy plant. Local residents will suffer a loss of privacy and the ability to move around freely. If this was to go ahead numerous local people will be aggrieved at the decision - it would not bode well for the good community relations enjoyed at the moment. Light pollution - The night sky across fields and towards the southern areas of Adlington would be affected by this proposed development.

Environmental:
Removal of grass verges is proposed - this will be a massive detriment to the local amenity.
Disruption to wildlife / nature
Introduction of traffic to areas that has no traffic presently.
Removal of a green field
Noise pollution

Economical:
Impact upon house values - the proposal alone has already blighted potential interest in house sales in the area.
The application for reduction of rateable values of existing houses due to the depreciation of amenities provided by the area.
Maintenance of roads/verges due to damage caused by potential increased frequency of larger vehicles-verges are already affected in the southern end of The Common/Old School Lane

7: Necessary changes
The change we propose is that Site 8 Harrison Farm be removed from the proposals. No other changes would make this proposal legally compliant or sound.

8: Participate in examination?
Yes

9: Reason participation necessary
Should our written objections not be taken into account we would find it necessary to adamantly object to this ill thought out proposal that has shown blatant disregard to the well being of local residents while proposing a site that sits at odds with the actual needs of Travellers. There is significant potential should this proposal go ahead for friction between locals and Travellers.

Councils response
The Council’s Statement of Community Involvement sets out the approach to consultation on planning policy documents. It does not require residents/businesses that are in the vicinity of a proposed allocation to be consulted on an individual basis. Such policy proposals are publicised by other means such as press releases, updates to
the Council website, informing local Councillors, and parish Councils where they exist. In addition, for Local Plan consultations, the Council consults directly with everybody that is listed on our Local Plan consultation database. Individuals or interested groups received a Preferred Options consultation letter if they had requested their names are added to the Local Plan consultation database. Others notified about the Preferred Options consultation were those who made representations to the Local Plan at an earlier stage. (For example, a number of residents living in the vicinity of Cowling Farm received letters because they had made comments at earlier stages of the Local Plan process and were therefore on the database). The Statement of Consultation Supplement identifies the consultation which has been undertaken during the preparation of the Gypsy and Traveller and Travelling Showpeople Preferred Options which forms part of the Chorley Local Plan 2012-2026.

Harrison’s Farm is allocated as an area of land safeguarded for future development needs and for allotments and a cemetery extension in the Chorley Local Plan 2012-26, therefore the principal of future development is established.

Lancashire County Council highways have stated that local safety improvements could be made to deliver this proposal. It is recognised that the canal bridge is a Grade II listed structure and an impact assessment has been undertaken. It is considered that this bridge would not be a suitable access.

The Council considers that actual or perceived impact on property value is not a material planning consideration.

Chorley Local Plan 2012-26 Policy BNE1 - Design Criteria for New Development criteria g) seeks to ensure that any new development will not cause ‘an unacceptable degree of noise disturbance to surrounding land uses’. Criteria f) protects important natural habitats and landscape features such as mature trees and hedgerows. Policy BNE9: - Trees also protects trees.

Chorley Local Plan 2012-2026 Policy BNE6 - Light Pollution identifies applications for development requiring or likely to require external lighting must include details of the lighting scheme as part of the application.

Harrison’s Farm has not been selected as the proposed site for Gypsy and Traveller provision because Harrison’s Farm falls within SA Band C and is a less sustainable option than the Chorley Town sites, so is not proposed for allocation.
The above site and indeed any site that may impact on the strategic road network would need to be agreed with the Agency as part of the planning process. We would wish to place conditions on any such application to protect the integrity and stability of the strategic road network.

The Highways Agency will be consulted on any planning application for Gypsy and Traveller provision.
Four of the eight alternative sites have been subjected to coal mining which has left a legacy. Sites 4 (recorded mine entry); Site 5, 8 and 9 (probable shallow coal mining). Whilst these coal mining hazards would not deem these sites to be automatically unsuitable; should the preferred site not be taken forward and an alternative site chosen, these risks should be identified as part of each of the sites constraints.

In relation to Site 9 there is no indication that site remediation will be required even though our information confirms that coal mining legacy may have led to ground instability.

Change requested – Site Information and Site Appraisal (Site 9 Hut Lane, Heath Charnock) - Contamination: "There are currently no known or suspected contamination issues at this site." Add the following text "Former coal mining activity has left a legacy of unstable land which will need to be assessed and appropriate remedial works undertaken prior to site occupation."

Reason - In accordance with local planning policy BNE7 of the Chorley Local Plan and the NPPF guidance (paras. 109, 120, 121 and 166), this would ensure that the policy that allocates potential development sites identify the necessary remediation or stabilisation prior to development.

Councils response

Comments Noted. Amend text "The Coal Authority records indicate that there was probable shallow coal mining activity on this site. If so, this unstable land which will need to be assessed and appropriate remedial works undertaken prior to site occupation."
The evidence clearly demonstrates that this site is NOT suitable for Gypsy provision. Additional to the evidence used by the LPA in the Preferred Options document are the facts: 1. There is a long history of conflict between the Gypsies living on the site and the adjoining settled community arising from the cavalier and duplicitous manner in which the site was originally occupied and reinforced by continuing friction between the settled and Gypsy families. This is contrary to the first bullet point of paragraph 5.8 of the Preferred Options document; 2. The site is correctly assessed as unsustainable by the LPA and therefore if national planning policy on Green Belts is to be complied with account must be taken of the Framework paragraph 84 which requires LPA's in reviewing Green Belt boundaries to promote sustainable patterns of development. Modifying the Green Belt to make an isolated exclusion from it for this site would offend that policy requirement and allocating the site for Gypsies in such circumstances would conflict with very clear national planning policy relating to inappropriate development in the Green Belt.

Whilst the principle of locating the Gypsy site at Cowling Farm is accepted, the allocation proposed is 9.5ha in extent and there is therefore considerable uncertainty on where the requirement for 5 pitches would be met, the impact it would have on heritage and ecological considerations and on its access. This uncertainty impacts on the deliverability of the site which is an essential consideration in making the allocation.

Although in the Green Belt, the Hut Lane site has been included in the Council's assessment because it received temporary permission in July 2013 for 2 years and Planning Policy for Traveller sites states that the merits of using it permanently should be assessed against the new sites. A planning Inspector in May 2012 (Appeal Ref: APP/D2320/A11/2159688) confirmed the site is greenfield.

The Hut Lane site is not considered suitable for allocation primarily because it has a poor sustainability score - Band D - representing the least sustainable site considered. Hut Lane is located in the Green Belt and in accordance with national policy is discounted because there are no very special circumstances to warrant selection of a site in the Green Belt.

It is acknowledged the site is adjacent to a residential area where there have been...
continued objections to the use of the site to accommodate Travellers. The acceptance of the principle of locating the Gypsy site at Cowling Farm is noted. The Preferred Options document is explicit and refers that the site area required for Cowling Farm is estimated at 0.4 hectares. The site will be located within the 9.5 hectare site allocated in the Chorley Local Plan for a mix of employment and housing. If a specific part of the allocation is identified now for the Gypsy and Traveller element it will prejudice:

• Community engagement between the settled and Traveller community.
• The masterplanning process.
• Highways options in relation to the delivery of the mixed use site.