

## APPENDIX H

### Summary of Consultee Comments to Masterplan January 2020

**Police Architectural Liaison Officer** - requests that security issues be addressed as early as possible in the design phase. This enables crime prevention strategies to be effectively integrated into the development and should be included in the Masterplan.

Given the scale of the scheme, it is likely that the development will create additional demand on local policing resources with calls for service. To reduce this risk all elements of this development should be built to the police preferred security specification Secured by Design.

Secured by Design has proven to reduce crime rates in crime types such as burglary, vehicle crime and criminal damage. Design guides for educational establishments, commercial use and residential schemes are available from [www.securedbydesign.com](http://www.securedbydesign.com)

**CCG/NHS Estates** - provided a list of GP Practices that will be affected by development of this site. They advised that the average number of patients per GP is approximately 1700 with the exception of the Village Surgery, all practices are exceeding the GP to patient ratio, meaning that the impact of Pickering's Farm will be felt severely by the practices

**Strategic Housing** - re-iterates the requirements of Policy C1 in the South Ribble Local Plan which requires the Masterplan to make provision for a range of land uses including residential, employment and commercial uses, green infrastructure and community facilities. Justification sets out that community facilities (including a nursery and primary education provision), a small local centre and health care provision will need to be included within the infrastructure delivery schedule and provided through developer contributions. This provision will help to ensure that the site is sustainable and support the delivery of market housing, affordable housing and specialist housing for older people.

Policy 7 of the Central Lancashire Adopted Core Strategy places a 30% target for affordable housing to be provided on sites of 15 homes or more. Given the proposed number of homes on this site is up to 1,100, it would be expected for this target to be achieved to ensure that the development can provide for a mix of housing including for people in housing need who cannot afford housing on the open market. Therefore, the Masterplan should ensure provision for the required affordable housing provision is met.

**LCC Archaeology** - confirm that The Lancashire County Council Historic Environment Team would agree with the conclusions reached in the December 2019 Masterplan document (Section 7.0 Environmental and Site Considerations) that the site could be considered to have a 'low potential for the presence of currently significant non-agricultural remains of all periods'. This should however not be taken to mean that there is a nil potential for such remains to be encountered, the site is a large one, nearly 54ha. in area, and one not previously subject to any formal archaeological investigation. Further post-permission (but pre-commencement) archaeological investigation of the site has been proposed in CgMs Heritage's *Historic Environment Desk-Based Assessment* (August 2019), comprising of at least a first stage of evaluation by means of geophysical survey and/or trial trenching. The need for any further archaeological investigation of the site would be then be dependent on the results of this first stage. This would, on the basis of what it currently known about the site, be considered an appropriate means of mitigating any adverse impacts of the proposed development.

It should however be noted, that in agreeing the Masterplan in advance of these works being undertaken, were significant or extensive archaeological remains to be found to survive within the proposed development, options either for their preservation in situ, or the potential ability to make changes to the layout in order to avoid the need for potentially expensive and time-consuming archaeological investigation of the site, will be greatly reduced, or lost entirely.

**LCC Highways** - highlight that the information presented is not in line with what has been discussed over several months. They confirm they will provide an initial response to the LPA on the Masterplan and whether it satisfies all local and wider needs including integration (into the neighbouring community), permeability (within and beyond), sustainability, having regard to existing local amenity and that impacts can be safely accommodated.

**Highways England** - are appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such HE work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England are concerned and need to ensure that an appropriate assessment of the development traffic impacts on the SRN is undertaken, with particular attention to the M6/M65 interchange, M6/A6/Church Road junction and proposed M65 Terminus roundabout.

**Environment Agency** - confirm that the site is located within Flood Zone 1 defined as having a low probability of flooding in the National Planning Practice Guidance. Based on the information currently available, the development raises no environmental concerns for the Agency. However, they do provide Technical Advice on the Use and Generation of Waste; Groundwater Protection; Fisheries and Biodiversity; and the disposal of surface water. The EA also refer to a number of publications which need to be taken into account. The consultation response includes web links to all these publications.

**Cadent Gas Limited, National Grid Electricity Transmission plc and National Grid Gas Transmission plc** - An assessment was carried out this has identified apparatus in the vicinity of the site:

- High or Intermediate pressure (above 2 bar) gas pipelines and associated equipment
- Low or Medium pressure (below 3 bar) gas pipes and associated equipment and likely that there are gas services and associated apparatus in the vicinity
- Electricity transmission overhead lines
- Above ground electricity sites and installations

As a result, they referred the consultation to the following for further assessment and also provided guidance and plans of the pipelines and overhead cables.

The Cadent Gas Plant Protection Team confirm there are Intermediate Pressure apparatus in the vicinity LOSTOCK HALL – PENWORTHAM 7BAR and Intermediate Pressure apparatus in the vicinity LOSTOCK HALL – KINGSFOLD 7BAR

The Protection Team consider that it is essential that access to the pipeline is not restricted, particularly in the event of an emergency. Therefore, there must be no obstructions within the pipeline's maintenance easement strip, which would limit or inhibit essential maintenance works on the pipeline. They also advise that individual 'service pipes' are not shown but their presence should be anticipated. Therefore, they require early contact at the planning stage is important to allow full discussion of proposals and to ensure the safety of plant and operators

National Grid raised no objections to the proposals which are in close proximity to a High Voltage Transmission Overhead Line – overhead electricity line, electricity town, low pressure gas mains, intermediated pressure gas mains. However, they advise that another enquiry should be submitted when more detailed plans become available.

**Network Rail** - Network Rail provided comment specifically on the two planning applications. However, they raise issues with the road scheme is going to significantly increase traffic utilising CGJ5 Bridge 113 as there is currently no through traffic, whereas following implementation of the scheme there would be significant traffic as the road scheme will be a link between A582 Penwortham Way and the B5254 Leyland Road. It is also noted that the bridge is suffering from

settlement, the condition of the bridge is likely to deteriorate if utilised for increased traffic. In its current state the bridge is unsuitable for a proposed link road.

**Health and Safety Executive** - Despite Network Rail advising that the railway is classed as a major hazard site, the HSE have no comments on the Masterplan and referred the LPA back to their on-line advice service in relation to the planning applications. This has been done in respect of both planning applications.

**Natural England** - considers that the proposed development of this site will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes. However, within Natural England's generic advice on other natural environment issues they identify that the initial screening indicates that one or more Impact Risk Zones have been triggered by the proposed development, indicating that impacts to SSSIs are possible and further assessment is required.

**Penwortham Town Council** - feel that the adoption of the Masterplan in its current format is not acceptable and raise a number of issues to be addressed. They consider that the site suffers quite extensively from flooding and it would appear from the Masterplan that whilst some consideration has been given to the water levels on the site, these go nowhere near addressing the problem, not only on the immediate site but also in the outlying areas surrounding this site. The Town Council feel that greater consideration should be given to this issue and assurances made that drainage from the site will not create further problems outside of the site area.

The Masterplan includes a proposal for building a new school, which the Town Council believes is supported by the Lancashire Education Authority. The Town Council do not have any great concerns regarding this proposal but are of the understanding that two local primary schools, Kingsfold and Broad Oak are both under capacity. Therefore they would wish to delay the building of the new school until such a time that the already existing local schools are at capacity.

Penwortham Town Council object to the access and egress of the site via a possible road through to Kingsfold Drive passing directly in front of Penwortham Community Centre. To dissect the community centre from the community centre car park would be disastrous and would make crossing from the car park for the elderly, carers with young children, children accessing the youth clubs, residents attending group activities etc. highly dangerous. The Town Council feel that this access and egress route should remain closed to traffic.

The Town Council have reservations regarding the building of a new community centre and highlight the requirements of The Penwortham Neighbourhood Development Plan Policy 5 – New Sporting Facilities. The provision of new sporting facilities adjacent to Penwortham Community Centre will be supported and Policy 6 – Penwortham Community Centre. The extension of Penwortham Community Centre, to include provision of a multi-use hall and cafeteria will be supported. The Town Council are of the opinion that this would be the preferred option moving forward and improvement works to the already existing centre would remove the need for a new centre being built. This area could be better used as green open space beside the water reservation areas. The Town Council would also like to see the playing fields adjacent to the Penwortham Community Centre extended enabling greater use of the site.

The Town Council consider that The Cross-Borough Link Road does not constitute a link road in the current Masterplan. The access to the site from the A582 leads perfectly onto the site but the junctions proposed onto Leyland Road are totally impractical. The Town Council are of the opinion that a junction on the existing bridge with give way signs and, in essence, a one-way traffic junction would not constitute a link road, and as such, feel that the only solution would have to be the building of a new bridge to ensure the smooth flowing of the CBLR.

The Town Council consider that Community Investment Monies (CIL) should not be used to fund the new road and bridge. A site the size of this proposal would need a major road network simply to deliver the proposal and as such the Town Council feel that the funding of this should most definitely be made by the developer.

The current infrastructure surrounding this site is simply not adequate and not able to support another 1100 properties and another possible 4000 road movement a day. The Town Council feel that the capacity of Leyland Road is already at its limits and the failure to dual carriage the A582 has meant that the current infrastructure cannot cope with any further developments.

**Preston City Council** - consider this development to be a significant part of the Preston, South Ribble and Lancashire City Deal, supporting the case for the much-needed continued improvement and widening of the A582. This is clearly a significant material consideration in favour of the development.

**Sport England** - have taken into account their current strategy and Planning for Sport guidance which sets out three key objectives:

- Protect - To protect the right opportunities in the right places;
- Enhance - To enhance opportunities through better use of existing provision;
- Provide - To provide new opportunities to meet the needs of current and future generations.

They also highlight Penwortham Neighbourhood Plan which sets out the communities' vision and aspirations for the town of Penwortham. There are a number of policies relating to the site within the Neighbourhood Plan, however Policy 5 specifically relates to the provision of new sporting facilities. The supporting text to accompany the policy links to policies G10 and G11 of the South Ribble Local Plan which sets out the standards and mechanisms for provision of open space and playing fields. The neighbourhood plan references the development at Pickering's Farm which is adjacent to the existing Penwortham Community Centre, which provides an existing focus for open space and sporting facilities. It is the communities desire to see the provision of open space including new sporting facilities arising from the Pickering's Farm development to be located adjacent to the Community Centre facilities.

The proposed masterplan sets out several opportunities for the site including:

- Providing a range of Character Areas, connected by a new network of well-defined streets and public spaces
- Extending the existing recreational space adjacent to Kingsfold Community Centre and linking this through green corridors to new public green spaces across the site
- The opportunity to enhance and supplement pedestrian/ cycle connections for the area, integrating the site within the existing network and public rights of way.
- The creation of a high quality and legible development; and
- The opportunity to promote and strengthen the green infrastructure providing a range of typologies across the development.

It is noted that the masterplan sets out under the principle of the development opportunities to deliver extensive green infrastructure across the site. The green infrastructure will have differing forms, functions and uses and will be connected by the extensive network of green links across the site. On-site green infrastructure provision will include amenity green space, equipped play areas, natural/ semi natural open space, playing fields and allotment provision. No further information in relation to what the formal recreation offer would be in either the masterplan or the outline application has been provided.

The objectives seek to provide legibility through the site and create a movement network for pedestrian and cyclist that promote the safe connectivity within the existing and proposed built and natural environment. The provision and enhanced legibility aim to be designed to ensure the safe movement of traffic.

The design principles therefore reinforce the importance of design and layout and the promotion of healthy living, including high quality green infrastructure, linking the internal elements of the site to the surrounding area. The importance of legibility is emphasised in the masterplan and therefore the structure of the streets will enable residents and visitors to intuitively find their way around and through the development between residential and non-residential elements.

Sport England welcomes the approach and principles set out in the draft masterplan in terms of active design, however limited information at this stage is presented in terms of how the linkages and legibility through and within the site will be implemented. It is also disappointing to note that the developer has not set out in either the outline planning application, masterplan document or the infrastructure plan how the developer is going to provide the formal recreation offer. As a result of this limited detail, Sport England provide further information regarding the additional demand for sport as a result of the proposed masterplan. Please see full consultation response.

**Greater Manchester Ecology Unit** - strongly recommended that the Masterplan and Design Codes are adjusted in order to provide a coherent scheme which provides for no net loss of biodiversity and Biodiversity Net Gain as signposted by both the applicant and emerging government guidance (Environment Bill 2019):

- The ES should be updated and all areas of the site surveyed, including the remaining 30% where no access has been allowed. As it stands, in ecological terms, it is not possible to fully assess the environmental and ecological impacts of the proposal and therefore plan adequately for avoidance, mitigation and compensation.
- The applicant and the Planning Authority should agree the percentage Biodiversity Net Gain that is to be achieved and the metric/method of calculation. At present in my view there is no planning confidence in the signposting of a “compensation package”.
- The Landscape Strategy and Green Infrastructure principles need to be more clearly defined in order to ensure that each phase of the development is built to the same approach. This should include:
  - Retention of the more than 125 year old orchard on Lord’s Lane
  - Clear proposals and design objectives relating to Hedgerows of which 29% of existing resource are classified as Important and >50% as species rich hedgerows.
  - Proposals to incorporate species rich hedgerows into the curtilages of properties is **not** acceptable, as there will be no long term control over the condition, management or retention of these features. Where hedgerows are incorporated into the boundaries of properties this should be considered a loss in the biodiversity calculation.
  - Landscape design focused on key known species resource and identified impacts for barn owl, bat roosts and bat foraging
  - Design principles for the Sustainable Drainage System (SuDS) to ensure areas of open water, wetlands and emergent biodiversity features are created **and** management is undertaken in an appropriate manner. This is to ensure that the SuDS can achieve the stated objective of surface water attenuation and biodiversity, and that this can be maintained through the operational lifetime of the development.
- It is not clear how the management of the Green Infrastructure estate is to be resourced or planned and this mechanism needs to be included within the Masterplan and passed through to the Outline submission for the avoidance of any future doubt.

**United Utilities** - In respect of Surface Water Drainage, UU comment that they welcome the consideration given to the management of flood risk and surface water within the masterplan document. Considering these matters at the outset, and identifying a site wide strategy, will ensure that the development is brought forward in a sustainable manner and can respond to matters and changing circumstances caused by climate change. UU encourage the applicant/ landowner to prepare a site wide sustainable drainage strategy for foul and surface water for the entirety of the scheme, taking account of the phased nature of delivery and how each phase will interact with each other. This strategy should clarify that all surface water will be discharged to one of the surrounding water courses, and no surface water will discharge to the public sewerage system either directly or indirectly.

United Utilities welcomes the inclusion of a preliminary drainage strategy within the masterplan document. The statement that surface water runoff from the site will be restricted with discharge to Mill Brook either directly or indirectly through the existing watercourses within the site or the culverted tributary to the north is supported, albeit UU will require further clarification on this. Furthermore, they require confirmation that no surface water will drain into the public sewerage

system either directly or indirectly. The drainage scheme for this site must be designed in accordance with the wider drainage discussions which have been held to date.

Given the various sustainable options available in relation to the drainage hierarchy for the discharge of surface water, the expectation will be that no surface water will discharge to the public sewer either directly or indirectly and we would welcome wording to this effect within the masterplan. The masterplan should clearly set out the need to follow the hierarchy of drainage options for surface water in the NPPG which identifies the public sewer as the least preferable option for the discharge of surface water. The masterplan states that based on anticipated ground conditions and the potential for shallow groundwater, infiltration is not considered to be a suitable method of surface water disposal. UU would welcome some further information regarding this as part of the site wide drainage strategy and prior to the detailed design stage.

United Utilities cannot emphasise highly enough the importance of including sustainable drainage systems and applying the surface water hierarchy for the discharge of surface water in a rigorous and consistent manner, especially in an era when the impacts of climate change are ever more present. This supports their recommendation to include sustainable drainage throughout the masterplan to ensure the applicant/landowner is addressing such concerns in future planning applications.

In respect of Sustainable Drainage and Green Infrastructure, UU welcome the consideration that has been given to surface water drainage and the inclusion of swales across the site. They support the inclusion of Sustainable Drainage Systems (SuDS) and would welcome the development of a SuDS strategy. They encourage the applicant to prepare a SuDS strategy in tandem with the site wide drainage strategy to ensure they are intrinsically linked through the detailed design process and to ensure that a site wide vision is achieved. Furthermore, the masterplan references that greenspaces could also naturally align with the sustainable drainage vision for the site, to create the opportunity for the delivery of ecological features including swales, wetlands and ponds. UU welcome the consideration of how green and blue corridors can ensure a fully integrated SuDS solution is achieved to provide multifunctional benefits as part of a high quality green and blue water environment. The detailed design stage should consider the topography of the site to understand any naturally occurring flow paths and any low lying areas within the proposal where water will naturally accumulate.

Sustainable surface water management should be used to support other principles and requirements of the masterplan, such as sustainable design and public realm improvements. There are opportunities to reduce the surface water run-off as part of the on-site public realm and landscaping proposals. The masterplan states that surface water runoff from the site will be restricted with discharge to Mill Brook either directly or indirectly through the existing watercourses within the site or the culverted tributary to the north. The masterplan proceeds to state that restricted rates, attenuation volumes and points of connection will be proposed once the Masterplan has been developed further. UU welcome further information to this effect and a site wide strategy that ensures all surface water is discharged into the surrounding watercourses and no surface water is discharged to the public sewer either directly or indirectly. For the avoidance of doubt, the expectation will be that only foul flows will communicate with the public sewer.

UU cannot stress enough the contribution that the design and landscaping of a site can make to reducing surface water discharge. UU welcome the references to surface water management within the masterplan and how this can be linked to the wider landscape, ecology and biodiversity strategies for the site.

UU look forward to seeing further information regarding how the scheme will incorporate genuine, above ground, sustainable drainage systems, landscaping features and permeable/porous hard surfacing materials to help reduce or maintain rates of surface water runoff. Consideration should also be given to how the delivery of water and waste water infrastructure can be incorporated into the wider infrastructure provision for the site to promote sustainable development and ensure efficiencies in delivery.

With regard to the provision of SuDS, UU also recommend a site wide management and maintenance plan for the lifetime of the development. This will ensure the continued effectiveness of the on-site systems through a thorough management and maintenance regime to prevent the systems not functioning properly, thereby undermining the site wide drainage strategy and increasing the risk of surface water flooding.

In respect of Foul Water Strategy, UU comment that the masterplan document does not make reference to an indicative foul water strategy. Any drainage proposals for the site must be designed in accordance with the wider drainage discussions which have been held to date. This includes discharging surface water to Mill Brook in the west, as set out above, and foul water flows to the 675mm diameter public combined sewer on Pope Lane.

Given the size of the masterplan site and the information provided regarding the phased delivery of the scheme, the site infrastructure will therefore also be delivered in phases. Due to the phased delivery of the on-site foul water system, it is imperative that a site-wide sustainable foul and surface water drainage strategy is prepared to cover the whole site. The site wide strategy will need to be upheld through the phased delivery of the scheme and the delivery of each phase will need to be fully compliant with that strategy. UU understand that foul pumping will be necessary and as per the discussions held to date with the applicant and UU request that the number of foul pumping stations are minimised to provide a single pumping station.

The experience of United Utilities is that where sites are brought forward in phases, and with multiple landowners, achievement of sustainable development can be compromised particularly when a site wide infrastructure strategy, including foul and surface water drainage, is not considered at the outset. This can result in interconnecting phases of development being brought forward in a piecemeal manner, with the interaction of phases not fully considered, undermining the broader infrastructure strategy for the site.

Any drainage as part of early phases of the development should have regard to future interconnecting development phases, ensuring unfettered access between the various parcels, preventing a piecemeal approach to drainage and demonstrating how the site delivers sustainable drainage as part of the interconnecting phases. The aim is to ensure the drainage and design principles set out within the masterplan are met through each development phase, irrespective of the timing of its delivery or the ownership status of the land.

UU would encourage a pro-active approach to sustainable drainage to ensure communication between phases so there is sufficient capacity to serve all the development sustainably in the development area and not just one phase. They believe that raising this point at this early stage in the preparation and evolution of the masterplan is in the best interest of delivering this scheme in the most sustainable and co-ordinated manner. Furthermore, a site wide sustainable drainage strategy will ensure that the delivery of the overall scheme is fully coordinated, notwithstanding multiple ownerships and phases.

In respect of Water Efficiency, UU comment that maintaining and improving water quality and the treatment of water and wastewater in the face of population growth, changing environmental legislation and climate change pressures will be an ongoing challenge for the development industry over the coming years. There is likely to be greater demand from customers for environmental improvements which in turn may be reflected in increased environmental standards over time. Consequently, development will need to enhance the environmental quality of the immediate area and manage the effects of climate change.

United Utilities encourages the use of systems such as rainwater harvesting and grey water recycling that help to reduce pressure on public water supply and the public sewerage system. Benefits include a reduction in environmental impact through the efficient use of valuable resources and a reduction in the costs associated with improving local water infrastructure for new

development as they require less mains water. An additional benefit is the reduction in future occupants' costs for both water bills and energy bills (through heating water).

**Design Code** – UU comment with regard to the Green Movement and Spaces section of the Design Code, UU welcome the consideration of how the sustainable drainage network can be interlinked with the wider landscape proposals for the site. The consideration of ecological features such as swales, wetlands and ponds to deliver the sustainable drainage vision for the site, and the proposals for the site's greenspaces, will ensure multifunctional benefits can be achieved. UU welcome the consideration of how green and blue corridors can ensure a fully integrated SuDS solution is achieved, providing multifunctional benefits as part of a high-quality green and blue water environment.

UU support the consideration of swales along the route of the CBLR corridor to provide surface water drainage and attenuation and the proposal to incorporate these swales into the surrounding land uses. Given the proposed location of the swales adjacent to the highway, debris can collect within them, preventing the system from functioning properly. UU therefore request that a thorough management and maintenance regime is imposed to ensure the continued efficient use of these swales, to prevent the systems not functioning properly and thereby undermining the site wide drainage strategy which in turn will increase the risk of surface water flooding.

**Infrastructure Delivery Schedule** – UU comment that the Infrastructure Delivery Schedule (IDS) does not specifically relate to the delivery of water and wastewater infrastructure and would welcome a holistic, site wide sustainable drainage strategy. This will ensure that the phasing set out within the IDS is achievable and a clear drainage strategy is in place from the outset. Where possible, the delivery of water and wastewater infrastructure should be considered alongside the broader infrastructure for the site to ensure efficiencies in design and to maximise opportunities for sustainable development. United Utilities will continue to work with the Council and the developers/landowners to identify any infrastructure issues and appropriate solutions.

**LCC Planning** - The Planning Manager at LCC provides comments relating to the planning applications in respect of Adaptable Homes, Air Quality and School Provision.

In respect of **Adaptable Homes**, LCC highlight The Central Lancashire Adopted Core Strategy Local Development Framework recognises the importance of 'adaptable homes', in particular at paragraph 8.25, and Policy 6: Housing Quality. LCC comment that the need for adaptable homes goes beyond accommodating for the housing needs of older people. Adaptable homes make dwellings usable by a wide range of householders, from families with young children to older less agile people and anyone living with a mobility impairment whether temporarily or on a longer term basis. It is also important to note that 'single storey homes' cannot necessarily be adapted to accommodate the needs of an ageing population, unless they are built in accordance with a recognised adaptability standard.

They raise the issue that there is a vague and uncertain commitment to the delivery of adaptable homes and request that all non-specialist homes on this development are as a minimum, built in accordance with 'Building Regulations M4(2) Category 2: Accessible and Adaptable Dwellings'. The Masterplan should recognise and highlight this requirement.

In respect of **Air Quality**, LCC highlights The Central Lancashire Adopted Core Strategy Local Development Framework which has a requirement in '*Policy 3: Travel*' to '*(i) Enabling the use of alternative fuels for transport purpose*'. Although, Paragraph 13.212 in the Environmental Statement submitted with the Planning Application lists some elements relating to sustainable travel and LCC welcome the consideration of these elements being incorporated into the development, they are concerned that discussions about how these aspects will affect viability and discussions about how they will be incorporated into the development will only be considered with SRBC prior to the completion of the proposed development. It is LCC's view that discussions about these elements, including viability, should be incorporated into the development as requirements at the master planning stage where appropriate. In particular, consideration about



contributions to low emission vehicle refuelling infrastructure, cycling and walking infrastructure, a detailed travel plan, cycle parking infrastructure and on-site shower facilities to encourage walking/cycling to work should be considered at this stage of the master planning process as they are central to the movement of people around the site and beyond.

In respect of **School Provision Planning**, LCC highlight the Education Contribution Methodology document which outlines the Lancashire County Council methodology for assessing the likely impact of new housing developments on school places, where necessary mitigating the impact, by securing education contributions from developers. Planning obligations will be sought for education places where primary schools within 2 miles and/or secondary schools within 3 miles of the development are:

- Already over-subscribed,
- Projected to become over-subscribed within 5 years, or
- A development results in demand for a school site to be provided.

LCC also wish to remind you of the DfE 'Securing Developer Contributions for Education' guidance that states that there should be an initial assumption that both land and funding for construction will be provided for new schools planned within housing developments, with the land provided on a peppercorn basis.

LCC comment that the proposed location of the school site adjoining the new road will have impacts regarding both air pollution and safe access. Access arrangements by vehicles into a school should be carefully considered to take into account the safety of pupils. Parking for staff and visitors only will be included within the site boundary, and inevitably, despite markings restricting it, some parents will temporarily park to drop and collect children close to the school entrance, causing potential safety issues.

Although there are likely to be other accesses for pupils and parents traveling by other means than vehicles, some will also approach on foot or bicycle from the new link road and their ability to access the school safely must be given high importance. The site entrance also appears to be proposed on a bend in the road which may reduce visibility for traffic emerging from the school.

More consideration should be given in the masterplan to the air quality around a school from excess vehicle traffic, and LCC believe that this should be a strong consideration regarding the location of the school from the Cross Borough Link Road access point. It is appreciated that green infrastructure has been indicated in the draft plan that may assist in reducing pollution from the link road.

The last formal response to the revised Draft Masterplan was November 2018. Within this draft LCC welcomed the change of the school site requirement from a one form entry primary school, to a two-form entry. The November 2019 draft masterplan includes the new site position for the school within the development. It is appreciated the South Ribble and the developer accepted the concerns raised by officers around drainage issues from the original location.

In terms of the feasibility of the proposed site, size details and site options were provided to you by officers in June 2019, making reference to issues which still required resolution and offering the earliest opportunity to meet and discuss with the planning authority and developer to avoid issues later in the planning process. These are still outstanding.

**LCC Education** - also provided comments separate from the LCC Planning but more relating to the planning applications. However, they re-iterate LCC comments that the impact and requirements of this development on school places should be considered in relation to the wider strategic site. The School Planning Team welcomes the inclusion of the 2FE school site to mitigate the impact of the Masterplan site. This requirement will be kept under review as the strategic site detail emerges. DfE Securing developer contributions for education guidance states that there

should be an initial assumption that both land and funding for construction will be provided for new schools planned within housing developments, with the land provided on a peppercorn basis.

In terms of the feasibility of the proposed site, the feasibility, site size detail and site options was provided to you by LCC's Capital Programme Team last year and highlight that this still requires resolution.

**Consultees still to respond at time of compiling this report:**

**Environmental Health  
Lancashire Fire and Rescue  
Lancashire Wildlife Trust  
Environment Agency  
Local Lead Flood Authority (LLFA)  
LCC Planning  
Arboriculturist  
CCG  
CPRE  
Strategic Housing  
Preston City Council  
Public Rights of Way  
Natural England**