

## List of Representations Received at Regulation 16 – Barton NDP

- 1) National Highways
- 2) Coal Authority
- 3) Sport England
- 4) Natural England
- 5) Canal & Rivers Trust
- 6) United Utilities
- 7) Cassidy + Ashton
- 8) Historic England
- 9) National Grid
- 10) Story Homes
- 11) National Farmers Union North West
- 12) Defence Infrastructure Organisation – Ministry of Defence
- 13) Environment Agency
- 14) Preston City Council
- 15) Wyre Borough Council
- 16) Homes England
- 17) Lancashire County Council
- 18) PWA Planning
- 19) Representations from Members of the Public x17 (*incl. duplicated / errors*)



**Total Number of Responses Received = 35**

**Table 1: Schedule of Representations**

Name of Consultee:	Comment Received:
National Highways	<p>Thank you for contacting National Highways to make us aware of the draft Barton Village Neighbourhood Plan consultation. Having looked at the draft Plan, there are no comments we feel we need to make and of course support the ethos behind Policy BNDP03 to attempt to encourage travel by sustainable modes when possible.</p>
Coal Authority	<p>Preston City Council lies outside the coalfield, there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.</p>
Sport England	<p>Thank you for consulting Sport England on the above neighbourhood plan. It is noted that this consultation includes presenting evidence collected to date and potential policy options going forward.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Paragraphs 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document - <a href="http://www.sportengland.org/playingfieldspolicy">http://www.sportengland.org/playingfieldspolicy</a></p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded - <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 98 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should</p>

look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy, such as the Central Lancashire Playing Pitch Strategy (2018). If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work -

<http://www.sportengland.org/planningtoolsandguidance>

If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes - <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

**Draft Policy BNDP 02** -Local Green Spaces of the neighbourhood plan is noted, which protects a number of green spaces within the neighbourhood area, including the following outdoor sports pitches and facilities:

1. Village Hall, Bowling Green, Tennis Club
2. St. Lawrences School Field, Jepps Avenue.
5. St. Marys and St. Andrews school playing field, Station Lane
7. King George Playing Field, Station Lane

	<p>Whilst Sport England can see the logic of this approach, it is not uncommon for sports clubs to relocate to alternative sites when they experience growth. The designation of existing sports sites as 'Local Green Spaces' would effectively stifle and restrict any potential future growth of a sports club owing to the fact they may need the necessary facilities to improve the use and viability of the playing field for sport or to release the existing site to enable them to grow. On this basis, Sport England would request that the proposed 'Local Green Spaces' designations are reconsidered in light of the above and in accordance with Sport England's Playing Field Policy and Guidance document. <b>Sport England are not supportive of this policy</b> approach going forward through the emerging Neighbourhood Plan.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals and it would be beneficial if <b>Policy BNDP 03 – Active Travel</b> and <b>Policy BNDP 05 – New Housing in Barton</b> makes due reference to the Active Design guidance.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p> <p>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</p>
Natural England	Natural England does not have any specific comments on this draft Regulation 16 for the Barton Village neighbourhood plan.
Canal & Rivers Trust	The Canal & River Trust have reviewed the submission version of the Barton neighbourhood plan and have no comments to make.

<p>United Utilities</p>	<p><b>Policy BNDP 04 – Drainage and Water Management</b></p> <p>UUW is pleased to see the recommended wording from our previous response dated 19th October 2022 included in policy BNDP 04 - Drainage and Water Management.</p> <p><b>Policy BNDP 05 – New Housing in Barton</b></p> <p>UUW is pleased to see the recommended wording from our previous response dated 19th October 2022 included in policy BNDP 05 – New Housing in Barton.</p> <p><b>Policy BNDP 06 – Areas of Separation</b></p> <p>We note that Policy BNDP 06 includes areas of separation in the north and south of Barton. The area of separation to the south appears to be located directly adjacent to Barton Wastewater Treatment Works. Whilst being supportive of the principle of this policy, we request that the policy acknowledges that investment in utility infrastructure may be necessary in the areas of separation.</p> <p>It is worth noting that the Environment Act 2021 places an obligation on sewerage undertakers in England to secure a progressive reduction in the adverse impacts of discharges from storm overflows to reduce the impacts on the environment and public health. This obligation will increase the need for future investment in wastewater assets (treatment and network). The investment response will often be constrained by engineering circumstances, which will determine the most appropriate location for additional storage to reduce spills. This may necessitate investment in new infrastructure in the green belt, the open countryside and existing green areas. Consistent with meeting this obligation, UUW requests that Policy BNDP 06 includes flexibility so that investment in utility infrastructure that is ultimately beneficial to the environment, biodiversity and our watercourses can be delivered in the most timely and effective manner.</p> <p><b>Policy BNDP 07 – Supporting Businesses</b></p> <p>UUW wishes to highlight that it owns assets which are currently situated beyond settlements and in open countryside on the adopted proposals map. Upgrades to these assets may be required in the near future, and it is important to ensure that any required upgrades and expansions to these sites can be made in order for us to meet the infrastructure requirements of proposed future development in the borough and future environmental drivers. UUW requests support for any consequential investment which will be necessary as a result of growth or environmental drivers. It is therefore requested that development plan policy is worded to recognise that utility sites, located within the green belt, open countryside or an area of separation, are appropriate for development for operational infrastructure purposes.</p>
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	<p>Our recommended wording is:</p> <p><i>d) Development proposals for infrastructure in the green belt, open countryside or an area of separation will be supported where they are needed to respond to future growth and environmental needs.</i></p> <p><b>Groundwater Source Protection Zone</b>  UUW notes that the area of Barton is located in Groundwater Source Protection Zones 2 and 3. We therefore recommend the following additional policy and associated explanatory text for inclusion in the Neighbourhood Plan:</p> <p><b><i>Policy BNDP 08 – Development in Groundwater Source Protection Zones</i></b>  <i>Development proposals must accord with the latest national guidance on Groundwater Protection. Where necessary, applicants will be required to undertake a risk assessment (quantitative and qualitative) of the impact on the groundwater environment and public water supply. Development will only be acceptable where it is demonstrated to the Local Planning Authority that there will be no unacceptable impact on the groundwater environment and public water supply.</i></p> <p><i>Explanatory Text</i>  <i>Where required in consultation with the Environment Agency and/or the water and sewage company, new development proposals will be expected to be supported by a risk assessment, careful masterplanning, and the incorporation of mitigation including measures to manage the impact of the construction process. Guidance on development in groundwater source protection zones is provided on gov.uk and within the ‘Environment Agency’s Approach to Groundwater Protection’.</i></p> <p><i>A quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. Subject to the outcome of the risk assessment, the mitigation measures may include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features).</i></p>
Cassidy + Ashton	<p>We act on behalf of Barton Hall which is a local business centre with planning permission for redevelopment of the site to provide a number of small business units. Barton Hall generally supports the Barton Neighbourhood Plan but would make the following specific comments:</p>

	<p>Objectives: The objective to support and promote local businesses is acknowledged.</p> <p><b>Policy BNDP06 - Areas of Separation.</b> Barton Hall acknowledges the changes made to the previously proposed Areas of Separation which included areas of existing built development, as acknowledged in the last para. of p. 37 of the Plan.</p> <p>The current proposals, set out in Fig. 8, are to have two areas at either end of the village and west of the A6. The inclusion of these areas is supported. As a minor comment we assume there is a typographical error on Fig. 8 with the Key showing the Barton Neighbourhood Plan Area and the Area of Separation the wrong way round. With this correction, the areas are supported.</p> <p><b>Policy BNDP07 - Supporting Businesses.</b> The policy BNDP07 supports the expansion of existing businesses and Barton Hall supports this policy. Local businesses make a major contribution to the local economy and local community and it is essential that they are supported at a local level and allowed to expand where appropriate. It is noted that the list of existing businesses is not exhaustive and this is important as the policy should apply to any local business including those that may be located at Barton Hall.</p>
Historic England	We have no comments to make at this stage in relation to Barton Village Neighbourhood Plan, but would like to be kept informed of future progress in its development.
National Grid	National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.
Story Homes	<p>These representations are made in the context of Story Homes' land interests in Barton, Land at Jepps Lane, which extends to approximately 5 hectares. The Barton Parish Council should be aware of Story Homes interests within the settlement given our planning application relating to Land at Jepps Lane (application reference: 06/2020/1002).</p> <p>Story Homes are committed to active engagement in the plan making process wherever it is suitable and relevant to do so. It is noted that involvement at this stage is of importance given that the emerging Central Lancashire Local Plan is currently at Preferred Options stage, with the public consultation ending mid-February 2023. Whilst the emerging Local Plan is in its infancy, and limited weight can be attributed, regard should be had to the emerging Plan and its ambitions.</p> <p>Story Homes is generally supportive of the proposals set out in the Submission draft Neighbourhood Plan, we do, however, have some comments relating to the content of the Neighbourhood Plan and supporting documents. These representations seek to clearly outline said</p>

observations to align the Neighbourhood Plan with adopted National Policy. Story Homes would also like to ensure that the Neighbourhood Plan is produced in an appropriate manner which aligns with the adopted Central Lancashire Core Strategy (2012), adopted Preston Local Plan (2015) and the emerging Central Lancashire Local Plan.

It should be noted that for a Neighbourhood Plan to be put to a referendum, and subsequently made, it needs to meet all of the basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990, this is then applied to Neighbourhood Plans through section 38(a) of the Planning and Compulsory Purchase Act 2004.

These basic conditions are set out below:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
- b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
- c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
- d) the making of the order contributes to the achievement of sustainable development,
- e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and
- g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

These representations will frame our comments around the basic conditions set out above, making recommendations for improvements or deletions where deemed necessary.

Story Homes appreciates the opportunity to provide representations to this consultation and reserves the right to comment on any additional versions of the Barton Neighbourhood Plan and evidence base documents.

**Draft Policy BNDP 02 – Local Green Spaces**



Story Homes supports Policy BNDP 02 and recognises the importance of respecting, retaining, and enhancing Local Green Spaces within the settlement. Whilst none of the Local Green Spaces bound the site under Story Homes' control at Jepps Lane, it is acknowledged that the Village Hall, Bowling Green and Tennis Club is in close proximity.

As part of the Outline planning application (06/2020/1002) Story Homes made a commitment to delivering a pedestrian footpath in the top left corner of the site to join the existing Public Right of Way, please see figure 1 below. This would enhance accessibility to Local Green Spaces within the settlement, as recognised within the policy, by providing and enhancing pedestrian links from the scheme through to the Village Hall, Bowling Green and Tennis Club. Through improvements to the adopted highway along Jepps Lane there would also be upgraded pedestrian crossing facilities to enable safe travel to other Local Green Spaces such as St Lawrence's School Field. Whilst the application is no longer live, Story Homes continues to promote the site through the emerging Central Lancashire Local Plan with these proposals in-mind. Should the site be allocated for residential development in the future, Story Homes would seek to ensure these links were provided.

In addition, our boundary treatments will respect the interface between the activities undertaken at the Local Green Spaces and the neighbouring residential use.

#### **Draft Policy BNDP 03 – Active Travel**

Story Homes supports Policy BNDP 03 in its ambitions to reduce reliance on journeys made via private car use and encourage the usage of active transport modes such as buses, walking and cycling. Story Homes have applied the active travel principles within its Outline application at Jepps Lane.

Firstly, Story Homes have sought to reduce the need to travel through their application. This would primarily be done through encouraging the usage of local amenities and using public or active transport modes should a journey be taken. Barton, as a settlement, has a diverse range of good quality services and facilities, including education uses and leisure offerings. Through the implementation of a Travel Plan these uses will be clearly identifiable to any residents and ways in which to reach these uses other than by private car.

Secondly, through the Travel Plan Story Homes would prioritise the usage of active travel routes such as buses or cycling. Given that Barton is a linear settlement that stretches along the A6 there are relatively good bus links both north towards Lancaster and south towards Preston. Clear encouragement of these routes will be given. As noted in BNDP 02, Story Homes sought to establish a footpath connection to the Public Right of Way to the north of the site at Jepps Lane. This will provide an active connection to the Local Green Space to the north and provide alternative pedestrian routes that do not feature the A6 in part.

Finally, off-street car-parking will be considered within the scheme in-line with policy expectations of Preston City Council and Lancashire County Council Highways. Suitable charging points for Electric Vehicles will be considered as part of the scheme as will cycle storage.

#### **Draft Policy BNDP 05 – New Housing in Barton**

Story Homes welcomes the inclusion of draft Policy BNDP 05, policies that deal with new residential development are seldom present in Neighbourhood Plans, however do afford neighbourhood groups the opportunity to shape development in their locality. Story Homes echoes the Neighbourhood Group's intentions to encourage high-quality residential development that add to the character of Barton and encourage a sense of community.

Story Homes considers that the build and design quality of their homes is of a high standard. It is this high quality which differentiates them from other competitors in the housing market and gives Local Authorities the comfort that local character and design will be respected and enhanced.

Story Homes recognises the additional information surrounding Preston's housing requirement and the distribution of development across the Borough. Preston has previously seen a great deal of development around North West Preston and Cottam, it is likely that as part of the emerging Central Lancashire Local Plan, development will be disaggregated differently. Story Homes representations to the Preferred Options consultation encourages the Combined Authority to consider development in outlying settlements such as Barton given the range of facilities and services.

#### **Conclusion**

Story Homes appreciates the opportunity to provide representations to the Submission draft Barton Neighbourhood Plan. Our representations note that Story Homes are generally supportive of the principles and visions set out in the Neighbourhood Plan and seek to showcase how the proposed development at Jepps Lane can achieve these same principles.

Story Homes acknowledges that whilst the Neighbourhood Plan has been prepared with the adopted Central Lancashire Core Strategy (2012) and Preston Local Plan (2015) in mind, there is an emerging policy position with the Central Lancashire Local Plan. The Central Lancashire Local Plan is currently at Preferred Options stage, whilst limited weight can be attributed to the Plan at this time, we would encourage the Neighbourhood Plan Group to have regard to the principles set out within this document.

Story Homes welcomes any future opportunities to make comments on the Barton Neighbourhood Plan and looks forward to engaging further with the Parish Council.

<p>National Farmers Union North West</p>	<p>I am writing on behalf of The National Farmers Union in the North West of England to make to raise some general points with respect to the Barton Village Neighbourhood Plan</p> <p>As stated in the consultation document Barton is a predominately agricultural area north of Preston with agriculture dominant land use Farming has shaped the landscape and is vital to the economy of the area. At present it is an incredibly uncertain time for farm businesses who are faced with volatile market prices coupled with a seismic change in the way in which agricultural support will be delivered. Farmers are being encouraged to become more efficient and diversify their income. The neighbourhood plan should allow them to adapt their business to take advantage of any opportunities which may arise, particularly around areas such as renewable energy and diversification enterprises. It should not act as a barrier to the development of agricultural businesses.</p> <p>With respect to <b>Policies BNDP 04 (DRAINAGE AND WATER MANAGEMENT)</b> and <b>BNDP 05 (NEW HOUSING IN BARTON)</b>, across Lancashire as a whole, an increase in the number of extreme weather events has meant that the existing field drainage systems have struggled to cope with the amount of water which is now draining through the system at times of peak flow and caused the fields to flood. Building developments are adding to the issues that they are facing. There has been a considerable amount of development in Lancashire recently at a time when more extreme rainfall events are becoming more common. These development leads to a reduction in the water carrying capacity of the green spaces and increase the rate of water runoff from these developments into the farmland drainage system. As a result, even more pressure is being pace on the system which is meaning that urban water is finding its way into farmers' fields and causing crop losses.</p> <p>Therefore, the neighbourhood plan should look sure that any development does not increase the flood risk of neighbouring farm land. This should include a requirement that a significant investment is made in upgrading the sewer system to cope with the extra demands being placed upon it and that a contribution is made to the maintenance of the farmland drainage channels which are receiving this urban water.</p> <p>With respect to <b>Policy BNDP 07 (SUPPORTING BUSINESSES)</b> as sated earlier the area is primarily agricultural and the neighbourhood plan should look to support agricultural businesses in both developing their core farming enterprises and taking advantage of diversification and renewable energy opportunities</p>
<p>Defence Infrastructure Organisation (MoD)</p>	<p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only</p>

and should be read in conjunction with any other submissions that might be provided by other parts of the MOD. Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To this end, MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

The Barton Village Neighbourhood Plan authority area is washed over by statutory safeguarding zones drawn to ensure that the operation and capability of BAE Warton is not compromised or otherwise degraded by development, specifically aerodrome height and birdstrike safeguarding zones for BAE Warton. The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected. Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of each of the safeguarding zone types is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

- The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Zones are drawn that trigger consultation on development of various heights to ensure that their effect on the protected airspace above and surrounding an aerodrome is assessed and, if necessary, mitigated. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.
- Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes.

Aircraft within these zones are most likely to be approaching or departing aerodromes and therefore being at critical stages of flight. Within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect.

This can include landscaping schemes associated with large developments, such as green and/or brown roofs/roof gardens on flat roof buildings, as well as the creation of new waterbodies.

Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation and therefore may be subject to design requirements or for management plans to be applied.

In addition, and where development falls outside designated safeguarding zones, the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability by virtue of scale, height, or physical properties. Examples of these types of development include renewable energy development such as the installation of wind turbine generators or solar photo voltaic panels, or any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft. Solar PV development can compromise the operation of communications and other technical assets by introducing substantial areas of metal that degrade signals and, depending on the location of development, may produce glint and glare to the detriment of aviation safety. Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more.

In addition, the MOD requests to be consulted on any proposals, regardless of height, which fall outside of an MOD safeguarding zone but are in the vicinity of military training estate or property.

In summary, the MOD should be consulted on any potential development within the Aerodrome Height and Birdstrike safeguarding zones surrounding BAE Warton, which consists of structures or buildings exceeding statutory safeguarding height zones, or any development which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation. I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Environment Agency	<p>We are pleased to see our comments on the previous draft version of the Neighbourhood Plan have been considered and the Plan updated accordingly. We have no further comments to make.</p>
Preston City Council	<p>It is the opinion of the Council that the draft policies of the submitted November 2022 Barton Neighbourhood Plan are in general conformity with the NPPF (2021), the Central Lancashire Core Strategy (adopted 2012), and the Preston Local Plan (adopted 2012).</p> <p>The Council wishes to make comment on the two identified following issues:</p> <ul style="list-style-type: none"> <li>• The key is incorrect on Figure 8, page 38. The Pink shaded area should be labelled as 'Area of Separation' and the Blue should be the 'Barton Neighbourhood Plan Area' boundary.</li> <li>• For consistency, it would be better for the Neighbourhood Plan boundary to be re-coloured red.</li> </ul> <p>The identified issues are believed to be minor and do not impact upon the soundness of the Neighbourhood Plan and can be dealt with through minor modifications.</p>
Wyre Borough Council	<p>Thank you for the opportunity to comment on the Submission Barton Village Neighbourhood Plan. Wyre Council has been working proactively with Barton Parish since 2017 on the Barton Village Neighbourhood Development Plan (BNDP) and have provided comments on several occasions on the draft BNDP.</p> <p>We are pleased that most of our comments have been taken into account in the latest BNDP (Regulation 15), however we are of the view that some of our comments in relation to the functioning of the Policies still need to be addressed to improve the clarity and the operation, given that Wyre Council would be one of the local planning authorities operating them. We therefore have comments to make to this consultation which are attached in Appendix A.</p> <p>Please also find attached in Appendix B our previous comments made in October 2022 to the draft document.</p> <p><b>Policy BNDP 04 - Drainage and Water Management</b></p> <p>Wyre Council has previously provided comments to the Parish on this Policy. In our view, some of the policy requirements within the BNDP go beyond requirements that would usually be expected when dealing with smaller (minor) planning applications and condition requirements usually attached to planning applications. No evidence has been provided to justify such an approach.</p>

Policy BNDP 04 states in part c) that 'Applicants will be required to submit a drainage strategy and construction management plan'.

In our experience construction management plans (or construction drainage management plans if that is what is meant by the Policy) are not always necessary or required by conditions on all planning applications. There is therefore concern that this requirement could be requiring information on all developments, including small scale (minor) developments where such a Plan is not necessary. Construction management plan's can also relate to matters other than drainage and so we believe the wording could be tightened to provide clarity on what type of plan is being requested.

It is also not clear whether this Policy is actually seeking submission of Construction Drainage Management Plan (ie, for drainage only, rather than a full construction management plan).

We would suggest part c) of Policy BNDP 04 is amended to read:

*c) Flood risk should be managed during construction, and drainage should be installed at the earliest possible opportunity. Construction can expose loose materials and drainage networks downstream can be vulnerable to pollution and blockage from such materials. Applicants will be required to submit a drainage strategy and construction management plan. A construction drainage management plan will also be required to be submitted for all major developments, and for minor developments where appropriate'. Further guidance on pollution prevention during construction phase can be found in Chapter 31 of the CIRIA SuDS Manual C753.*

#### **Policy BNDP 05 – New Housing in Barton**

Policy BNDP 05 states in Part k) that 'new housing development should demonstrate accordance with the appropriate BREEAM standards in use at the time of submission. Encouragement is also given to schemes that meet Passivhaus standards'. BREEAM standard usually only applies to multi-residential buildings and non-residential buildings (e.g., BREEAM New Construction does not apply to residential buildings).

There is concern therefore that the Policy as written is requiring all housing developments to accord with BREEAM. Wyre Council commented to the Barton Parish that the Policy was requiring measures beyond BREEAM standards.

Furthermore, there is also concern that referring to standards in place at the time of submission of an application may cause issues in practice as standards and regulations can change during a planning application process. We therefore suggest that the Policy should refer to the time of determination.

	<p>It is considered therefore that the Policy should be worded to make clear whether the BNDP is requiring BREEAM in relation to for multi-residential buildings only.</p> <p>We would suggest part k) should be reworded to the following: <i>New multi-residential housing development should demonstrate accordance with the appropriate BREEAM standards in use at the time of submission determination. Encouragement is also given to schemes that meet Passivhaus standards.</i></p> <p><b>Local Plan Status</b></p> <p>You may wish to refer to the Wyre local Plan (2011-2031) (incorporating partial update of 2022) which was adopted by Wyre Council on 26 January 2023.</p> <p>Recent Planning Application Approvals within the Wyre Boundary:</p> <p>18/00605/OUT - North of The Hollies, 739 Garstang Road, Barton. – 1no. dwelling - A/C 19.09.18. - Approval lapsed on 19.9.21. 16/00846/OUT - Northlands, 827 Garstang Road, Barton. – 1no. dwelling - A/C 25.04.17. - Approval lapsed on 25.4.20. 17/00281/OUT - Adj. The Hollies, 739 Garstang Road, Barton. – 1no. dwelling - A/C 16.08.17. - Approval lapsed on 16.8.20.</p>
Homes England	Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.
Lancashire County Council	<p>School Planning Team</p> <p>The County Council's School Planning Team recognises the value of engaging with local communities at the earliest stage of their own plans to ensure the future needs of education are highlighted and documented within the local plan policies. The value of local knowledge can help to define and shape and future of local communities, ensuring the right level of infrastructure is achieved to meet the growth of housing and employment. Further information about school planning in Lancashire is provided in The School Place Provision Strategy 2022-2025.</p> <p>The School Planning Team has worked closely with colleagues at Preston City Council and Wyre Borough Council over a number of years as they develop Local Plans and development plans to ensure the infrastructure requirements are included within the policies to support the successful delivery of sustainable housing development, including the allocation of land for new school provision. The County Council produces pupil projections that can assist local planning authorities, both in terms of long-term planning and securing education contributions</p>



from developers. We will continue to work with, and advise, the local planning authority of the pupil projections taking into account planned housing development. This data is applied to the Pupil Forecast Methodology which enables the County Council to forecast the 5 years position, for further detail of this process please refer to the methodology link below.

<https://www.lancashire.gov.uk/media/919265/pupilforecastmethodology.Pdf>

We note that page 13 of the Neighbourhood Plan identifies the provision of infrastructure as an 'Objective' and we ask that it is recognised that school place provision is a key element of delivering sustainable communities. The DfE guidance 'Securing Developer Contributions for Education' advises that housing development should mitigate its impact on school provision. In relation to the Free Schools Programme the DfE expects the developer to make an appropriate contribution to the cost of the project, allowing the DfE to secure the school site on a peppercorn basis and make use of developer contributions towards construction. Lancashire County Council's Education Contribution Methodology provides details of how developer contributions are sought.

The School Planning Team works with local planning authorities to identify where development will result in a shortfall of school places and to secure contributions to mitigate the impact of development. We are currently working with Preston City Council on the development of the Central Lancashire Local Plan, including in relation to the current Local Plan consultation. Part of this engagement involves identifying impact on school place provision and establishing plans to address increased demand. This exercise will be completed once the 'Calls for Sites' process is completed. Further information about future demand for school places and plans to address projected shortfalls can be viewed at:

<https://www.lancashire.gov.uk/council/performance-inspections-reviews/childreducation-and-families/school-organisation-reviews/>

Lancashire County Council's School Planning Team wish to thank the Parish council for the opportunity to engage in this process and we look forward to further engagement in the future.

#### Flood Risk Management

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 the County Council is the Lead Local Flood Authority which is a statutory consultee for developments in connection with surface water drainage. Comments provided in this representation, including conditions, are advisory and it is the decision of the Local Planning Authority whether any such recommendations are acted upon. The comments given have been composed based on the extent of the knowledge of the Lead Local Flood Authority and information provided with the application at the time of this response.

**Policy BNDP 01 – Green Infrastructure**

We support the direction of this policy but recommend some minor alterations. We suggest that everywhere within this policy that uses the term 'green infrastructure', should be reworded Green-Blue Infrastructure (GBI). The policy itself discusses watercourses and water features (both classed as blue infrastructure) but does not include it in the actual policy requirements, which could lead to missed opportunities on new developments. There could also be a link made between incorporating high quality SuDS components that provide water quality, biodiversity and amenity benefits into existing GBI corridors, to enhance them further. There is a typo at the beginning of this policy, 'BNP 01' in the policy body should be 'BNDP 01'.

**Policy BNDP 04 - Drainage and Water Management**

We support this policy but there are some minor alterations we would recommend, ensuring the policy is in accordance with national policies such as the National Planning Policy Framework. The hierarchy of drainage options is no longer paragraph 080 of the Planning Practice Guidance (PPG) following its August 2022 update. It is now paragraph 056 of the flood risk and coastal change section of the PPG. To future proof the document, it could be worth either removing the paragraph number completely or including a statement e.g. 'or any future revisions of the PPG'.

Part a) of BNDP 04 – As mentioned above it is now paragraph 056 of the PPG following the August 2022 update, it is no longer paragraph 080. We would also recommend trying the future proof the policy to future policy and guidance changes. There should also be reference to paragraph 167 of the National Planning Policy Framework.

Part d) of BNDP 04 – The language used in this part of the policy is not reflective of national policy as there is no requirement in national policy for sustainable drainage systems to provide multi-functional benefits, biodiversity net gain or treatment trains - this is only currently guidance. Therefore the 'must' in this section should be carefully considered, and perhaps swapped for 'should'. With biodiversity net gain becoming mandatory later this year, SuDS can be used to assist with BNG targets, but this is not mandatory.

See part d) of paragraph 169 of the National Planning Policy Framework for confirmation of this in full.

Part e) of BNDP 04 – The statement in brackets regarding using the total site area to calculate the greenfield runoff rates is inaccurate and could potentially increase flood risk from new development sites. We would recommend removing the bracketed section altogether to prevent confusion and poor drainage design. Large areas of Public Open Space (POS) and runoff leaving the site boundary from non-drained areas of a development should not be included in the site area when calculating the greenfield runoff rate as this is additional runoff to what is being

	<p>discharged via the sustainable drainage system (SuDS), increasing the rate of surface water runoff actually leaving the site. This information is clearly stated and explained in chapter 24 of the CIRIA SuDS Manual (C753) and on the HR Wallingford FAQs website.</p> <p>What this response DOES NOT cover</p> <p>This response does not cover highway drainage, matters pertaining to highway adoption (s38 Highways Act 1980) and/or off-site highway works (s278 Highways Act 1980). Any policies pertaining to highway matters would need to separately discuss with the relevant highway authority.</p>
<p>PWA Planning</p>	<p>1.1 – 1.9. Relate to Seddon Homes site.</p> <p><b>Policy BNDP 01 – Green Infrastructure</b></p> <p>1.9. The position on this policy remains the same in that there are no objections to the proposed policy, Seddon Homes understand the importance of enhancing green infrastructure and adding to the current provision, as is evident when looking at the previous proposals associated with the site in discussion. The development being promoted by Seddon Homes has placed a clear and significant emphasis on green infrastructure and would bring with it important and immediately greater benefits than most competing future housing proposals in respect of local open space, infrastructure provision, local bio-diversity and landscape quality to the settlements of Bilsborrow and Barton.</p> <p><b>Policy BNDP 03 – Active Travel</b></p> <p>1.10. This policy echoes the details of the previously proposed policy - <i>Promoting cycle and Pedestrian Activities</i>, and in the same context there are no objections to the policy and the desire to promote sustainable transport and outdoor activities. As part of scheme previously proposed, which Seddon would still deliver, new footpath connections would be implemented, providing an additional connection to Garstang Road and enhancing the use of the proposed public open space as well as the general provision of local public rights of way.</p> <p><b>Policy BNDP 05– New Housing in Barton</b></p> <p>1.11. The below is an excerpt from our previous response to the last consultation which is consider to unresolved by the current plan and hence Seddon remain objectionable to it:</p> <p><i>“This policy is the main policy regarding the provision of new housing across the life of the plan. The policy does not seek to allocate any land for development and fails to make adequate provision for new housing to ensure Barton makes a contribution to Preston’s housing stock relative to the size of the Neighbourhood Plan area. Barton is a desirable location for new development and benefits from having a number of logical extension sites and this neighbourhood plan exercise represents an appropriate opportunity for such sites to be allocated for housing development.”</i></p>

The policy exclusively refers to housing provision to serve Barton, limiting market schemes to within the settlement boundary. Whilst it is acknowledged that the general aim of the NP is to serve Barton, that does not imply the NP area can ignore its ability to aid the appropriate growth of other settlements and communities, especially when considering the NP area is so significantly larger than the settlement. The NP incorporates and borders other communities and settlements and it should not be a tool of NP to limit the appropriate growth of such places. Rather the Plan ought to have a focus on growth beyond the limits of the main settlement within the Plan area. The policy as written completely inhibits sustainable growth of other communities and as such is not considered appropriate or sound.

Concerning Seddon Homes this is most pertinent with regard to Bilsborrow, which is discussed further in relation to the next policy. However, for clarity the policy should permit for new housing to serve Bilsborrow or at worst not seek to unduly restrict it.

With regard to the section on 'New housing outside development boundary', this permits only for small scale affordable housing. As noted in section 1.8 of this response. To encourage affordable provision, one must also accommodate for market dwellings in turn.

In relation to the section entitled 'Questionnaire 2019', this presents a position largely against family sized homes. However, for this to be given any weight further context must be given to the current demographics of the population. It is anticipated that Barton has a population with an older than average age, hence the desire for retirement, extra care and bungalows. Whilst it is important to have regard to the future needs of the current community, this does not mean we can ignore the needs of others with a desire to move to the area or those within the area who will be looking to start families in the near future. The NP does not make any housing allocations and consequently it will fail to meet the needs of the current and future community. Without allocations there won't be adequate provision of new older peoples housing, which in turn will not allow for people to downsize and result in existing larger families' homes not coming to the market.

#### **Policy BNDP 06 – Areas of Separation**

1.16. As with the previous version of the NP, this policy seeks to establish a default position against development in the policy's designations. Whilst the policy looks to infer development which does not "*result in increasing the coalescence between Barton and Bilsborrow*" would be acceptable, the reality is that any built development would be viewed as in conflict with the policy.

1.17. As noted in the above commentary, the policy refers solely to the character of Barton, with only a passing reference to Bilsborrow to say it falls within Wyre Borough Council. The policies in the Barton NP need to have sufficient regard for the needs of local communities outside of the settlement of Barton. It is not appropriate to have a large NP area and retain such a singular focus with regard to the location of new development.

It remains our view that the designation intentionally includes land which are logical locations for appropriate growth. Areas of separation allocations could be made which do not prohibit both Barton and Bilsborrow from accommodating a suitable amount of growth across the life of the Plan. We consider our previous objection to this policy to be unresolved and that the follow commentary continues to be relevant:

*“Revised designations should be considered which do not sit tight to the boundaries of the aforementioned settlements. Should the above be accommodated for it is likely the designations will be able to be attributed more weight in the determination of planning applications given they would be allowing for a relative level of growth whilst understandably protecting against the merging of settlements....In order to ensure the policy is considered sound the extent of the areas of separation should be revisited and revised to allow for appropriate growth.*

*In this context it is worth noting Preston City Council as part of the production of the Local Plan assessed the entire Council region and where appropriate made formal Area of Separation allocations. No such designations were made within the Barton Neighbourhood Development Plan area and as such we would ask what the community consider has changed since the production of the Local Plan which renders these designations necessary. Should technical matters, such as highways capacity, become problematic due to additional growth within Barton then development would be resisted on such grounds irrespective of any designation of areas of separation. Notwithstanding that the level of growth within Barton during the Local Plan period has been relative to the size of the settlement and there is nothing to suggest the area will in the future be subject to increased development pressure beyond what is appropriate for the location. Broadly speaking allocations of this manner are a strategic matter which should be controlled by the Local Authority and not via a Neighbourhood Plan.*

*The policy text makes reference to Policy EN1 of the Preston Local Plan which relates to development with the open countryside. The text states as follows:*

*“All forms of development outside the main settlement boundary will need to meet policy EN1 of the Preston Local Plan or whatever policy supersedes it together with the NPPF policy on development within the Open Countryside.” Henceforth it would appear that adequate policy protection is already afforded to these locations and their further designation as areas of separation is an unnecessary additional designation which in reality offers no further protection to that which already exists.”*

Seddon Homes does not consider the policy appropriate and requests the extent of the designations is revisited to accommodate for appropriate growth on edge of settlement locations. Furthermore, whilst the policy justification associated with Policy BNDP 05 acknowledges the Local Plan Partial Review in Wyre, it fails to note that following on from this, the Council are now undertaking a full review of their Local Plan. The process has already started with a Call for Sites exercise currently live. Hence it is readily conceivable that growth locations and aspirations may well change and from a Wyre policy perspective Bilsborrow could be promoted for appropriate growth.

The Barton NP acknowledges that Barton is a linear settlement and the same applicable to Bilsborrow, hence in a situation which the settlement is subject to minor expansion, its likely to be directly south or north of the existing settlement and the policies in this plan should accommodate for that. This is evidenced by a few recent planning permissions within Bilsborrow toward the southern extent of the settlement, namely:

- App ref 19/00677/FUL – this permission establish permission for two dwellings south of Bilsborrow Lane on the north side of the Brook along the public footpath from Bacchus fold into Bilsborrow. This permission effectively links the built extent of Bilsborrow with Bacchus Fold.
- App ref 22/00122/OUT – this relates to land south of the Olde Duncombe House Guest house and again represents the southward progression of residential development.

1.21. Clearly the best way for Barton NP to aid in managing the growth of Bilsborrow is to proposed land for allocation, given this would best channel development to the most appropriate location, which in this instance we believe is the site promoted by Seddon Homes.

### **Conclusion**

1.22. This statement seeks to clearly and succinctly detail the position of Seddon Homes with regard to the Barton Village Neighbourhood Plan Regulation 15 Consultation document. In summary the positive position taken regarding the promotion of new green spaces is welcomed as is the desire to see affordable homes delivered.

However, there are clear deficiencies with regard to the manner in which the Plan handles proposals for new residential development and before the Plan can be considered sound it is thought necessary that both polices BNDP 05– New Housing in Barton and BNDP 06 – Areas of Separation are revisited.

1.24. Finally on the basis of the proposed full review of the Wyre Borough Council Local Plan, it would be considered premature to progress with the Neighbourhood Plan, whilst this exercise is ongoing. To ensure the NP remains in line with the aspirations and objectives of the relevant Local Plans, progression of the NP should be placed on hold until the conclusion of this exercise to ensure it is able to account for any revised assessment of Bilsborrow’s capacity for growth.

<p>Member of the Public</p>	<p>I am new to the area but have strong family ties to the area so don't consider myself to be a complete new comer.</p> <p>I love the area and value that it has a good community feel. However the volume of traffic along the A6 and the speed that some vehicles travel at is, I believe dangerous for pedestrians. This is heightened when there is a closure or diversion on the M6. It can be difficult to pull out on to the A6 but more importantly it can be dangerous for pedestrians crossing the road. Being a linear village, it is more important than ever to be safe. I would welcome a reduction in the speed limit and a camera.</p> <p>In line with many other residents the lack of a shop selling day to day items and groceries within walking distance is detrimental to the village.</p>
<p>Member of the Public</p>	<p>As the local Ward Councillor for Preston Rural North and County Councillor for Preston Rural, I totally support this draft Neighbourhood Plan for Barton including the vision and objectives stated in the plan. I would like to comment on a couple of the policies although I do stress that I support the whole plan. Policy PNP01 - Green Infrastructure - this is becoming increasingly important to local residents and also supports their health and wellbeing. It is important that the green infrastructure listed in the draft plan, is not only preserved but enhanced but retained for future generations. In addition to this the local green spaces as identified in the plan should be protected and designated as local green spaces in line with the NPPF.</p> <p>Barton has the main A6 road running through the village and I particularly welcome Policy BNDP 03 - Active travel, which seeks to reduce reliance on cars and vehicles and promotes the use of designated Public Rights of Way and Bridleways - these are important to the residents of Barton. It is good to see that plans to help residents cross the busy A6 safely are also included in the plan.</p> <p>Barton has had its fair share of new homes over the last few years and these have not always been welcomed or acceptable. Policy BNDP 05 seeks to ensure that any development in Barton should be of good quality and design and is needed by the local community. I totally support this Policy which encourages inclusivity for all residents and supports elderly residents wanting to stay in the village to downsize and younger people to get on the property ladder. Without this Policy in place we will find a lot of younger people moving out of the village as the cost of housing in Barton is increasing. A good mix of housing to satisfy the needs of all residents is needed and this policy should help address this. This will ensure that Barton continues to be a thriving village with a fantastic community.</p>
<p>Member of the Public</p>	<p>Having recently viewed the vision for Preston and Chorley these documents raise the same concerns for myself;</p> <p>No consideration for the impact on water supplies;</p>

	<p>A lot of mention of drainage, presumably means drainage ponds as seen around the new developments in Cottam and elsewhere - all of which are poorly protected and a hazard to all, particularly the young;</p> <p>No mention of Schools;</p> <p>No consideration for Policing and other emergency service provision;</p> <p>An emphasis on promoting use of Cycles and Public transport is to be applauded, however, there should be a realisation that any young people moving to the area will not be working in Barton and will use private vehicles to get to work, it is unrealistic to believe adequate public transport will be provided - how will this impact the local roads;</p> <p>What measures will be put in place to minimise the disruption to existing residents during the building phase of the larger developments (life around Cottam and Whychnor has been adversely affected). Additionally what measures will there be to ensure excavations will be correctly repaired a they do not appear to be in the areas mentioned above.</p>
Member of the Public	<p>How will the plan be enforced? I would like to see greater emphasis put on speed calming measures on A6 and land assigned for community : local convenience, local business units.</p>
Member of the Public	<p>Barton has lost its village feel. The infrastructure is not there and the A6 cannot cope with any more traffic. There are not enough amenities for any more housing and not enough school places for all the children moving into the area. Any more housing would be of huge detriment to the people that are already living here</p>
Member of the Public	<p>I support this plan</p>
Member of the Public	<p>Planners have an obligation to current and future generations of residents. Decisions made now will have an impact on the citizens of Barton and the surrounding areas for many years ahead. Planners have a responsibility to make decisions that create neighborhoods where people can thrive.</p> <p>Key points:</p> <ul style="list-style-type: none"> <li>- Barton deserves to keep its identity as a village and not become part of one indiscriminate sprawl of modern, soulless housing that begins in Broughton and stretches to Garstang.</li> <li>- The road system from Broughton roundabout up to Barton now just about caters for current traffic. It can't take much more.</li> <li>- To optimize sustainable living and improve health and well-being of the residents of Barton, all amenities ( education, health, work and leisure) should be planned in advance so that they can be accessed by all residents in a 15 minute walk or cycle. The planners have the power to</li> </ul>



	<p>ensure these amenities are provided through CIL tax and don't allow the housing companies to renege on their commitments. If builders want to build and profit from a community then they must contribute to the wellbeing of that community moving forwards. ( No excuses )</p> <p>- Off road walking and cycle trails should be planned into the scheme so that residents can benefit from clean, safe environments to exercise.</p> <p>Planners should always have the needs of residents both current and future in all their decision making and not be manipulated by big housing builders.</p>
Member of the Public	<p>I am all in favour of planning decisions being made by local authorities at a local level where ever possible, and not being dictated to.</p>
Member of the Public	<p>I am in full agreement of Barton Local Neighbourhood Plan. The boundary set is of particular importance to maintain the village character and appeal.</p> <p>The size and scale of recent and ongoing developments should be taken into account when considering any future planning applications. As stated in the plan they should be small scale eg. infill land and on previously developed sites ie. brownfield.</p> <p>I also wish to make comment on transport infrastructure. I am in agreement with the suggested improvements to transport.</p>
Member of the Public	<p>An excellent document demonstrating a balanced and sensible approach to the Barton Parish area. If additional development is appropriate under the terms of the planning applications then priority is essential for smaller residential housing units - large scale and large houses should be avoided.</p> <p>I would however like to see a focus that any and all new developments should pay particular attention to disability needs.</p> <p>This would entail exceeding the current guidelines for access and adjustments since Barton has a lot of older residents who may wish to downsize but would only be able to do so if the housing stock is appropriately adapted, (e.g. wet rooms, wider doors allowing access for wheelchairs and ramped access to front and rear.) These can all easily and cost effectively be done at build stage.</p>
Member of the Public	<p>Basic Conditions</p> <p>3.2 - Social Objective. With more people working from home/hybrid working - we need up-to date technical infrastructure. Fibre broadband needs to come into the area so residents can upload and download when working on home computers that are on par with the national internet speed.</p>

	<p>4.1 Plan making. With the pursuit of more land, are there any plans for new schools - 700 applications for Year 7 at Broughton High and they are 6 form (180 kids per year) Where are the children supposed to attend their school?</p> <p>4.1 With all the new housing, wouldn't it make sense to have a local convenience store?</p> <p>4.12 Flood risk - Jepps Lane regularly floods after heavy rain.</p> <p>AOB - When is the next scoping questionnaire?</p>
Member of the Public	<p>Jepps Lane, Jepps Avenue, Forrest Gate, Mosslea Drive require better digital infrastructure to be in line and compete with upload and download speeds. Working from home/hybrid working is very common now and we need fibre optic connections so this is sustainable</p>
Member of the Public	<p>Barton Neighbourhood plan</p> <p>I welcome the opportunity to contribute comments to the finalisation of our local neighbourhood plan. As a resident of Barton for many years, I am keen that we sustain its charm and character, and selfishly as somewhere people still want to live.</p> <p>General comments and Observations,  Age of survey: the plan is predicated on the needs of its population from a survey taken 5 year ago (2018). Since which the village has almost doubled in size due to extensive development work. (460 original houses, with 335 new ones in development). it's difficult therefore to triangulate that the needs of the original population mirror now the needs of the current population which is greatly expanded.</p> <p>Joint Strategic needs assessment (JNSA): when considering the objectives of economic growth, social and environmental considerations to promote a health and well being, I didn't see any reference to the parallel and complimentary strategic needs assessment. When considering our neighbourhood plan, we should seek to consider those wider needs. Making decisions to double our village size due to the need to expand housing stock, is ok on the one hand but without parallel expansion in supporting life services (Schools, doctors, dentists etc) it becomes difficult and detrimental to peoples quality of life Something in the policy that draws these connections more specifically such there is recognition in our planning decisions on balancing the need for more houses against the real needs of the people to living in those houses, would be helpful.</p> <p>Digital exclusion: i noted comments within the document with regards new websites and use of face book as the primary social media platform. Although comments were also made on leafleting etc, from speaking to some neighbours, including some not on fb they were unaware of the plans existence nor their opportunity to comment. Many of our older population are not digital enabled, The opportunity to use notice boards doesn't appear to have been used. I question therefore whether the consultation has been effective to the population demographics within the village.</p> <p>YP Inclusion: building on the point above, the younger residents are unlikely to use Fb as their platform of choice. Recent research by a youth council within L&amp;SC NHS found this actually to be instagram. I could find nothing in the plan which had attempted to harness the voice of our younger residents, as a family oriented area again this is a potential gap in the consultation process.</p> <p>M6 Closures: a key consideration of planning and traffic management is related to our proximity to the M6. The a6 is the only alternative route when traffic issues occur on the M6. this past winter we saw a multitude of occasions where traffic chaos was created by the closure of the M6. this was further compounded by the myriad of developments going on in parallel and their use of temporary lights. We sit adjacent to one of the</p>

longest stretches of motorway (with no junction between Broughton and Galgate). I could see nothing in the planning considerations that bring this on-going issue to life, with a need for greater coordination across boundaries so traffic congestion doesn't become dangerous. Seeking to promote a new junction (which i know remains a no-go for the M6) but could be hugely beneficial to local residents.

Infrastructure: i noted a number of references to the infrastructure of water flooding, sewage etc, but not much of the phone signals and broadband availability. As our housing stock grown, and digital enabled society continues to grow, we have real challenges within the village with regards suitable communication infrastructure. Telephone exchanges, masts and broadband is significantly constrained, again all of which is detrimental to people living in the village. Similar to the point earlier on JSNA, something in our policy that acknowledges these needs within the decision to allow further planning to take place - as it places unsustainable strain on already strained services.

Investment from Developers, I noted a couple of references to the infrastructure levy. this is something I'm aware of but not particularly knowledgable. So apologies if my comments here are off beam. As we see developers build and make considerable profit from those developments, local policy should seek to match that to their contribution to local people. Encouraging them to leave a tangible legacy for local people, the £% or £capita or £dwelling should be for local determination and influences, and enshrined in our local policies. Although at this juncture it feels like closing the door after the horse has bolted!

Turning to the details,

Section 6: didn't appear to have connected all the survey results, directly. It was difficult to see therefore from the high level summary comments given earlier in the document, how they had transposed into the detail of section 6.

Policy 01: GI, here the thrust of the policy was to maintain connection to existing identified green spaces, but not to encourage the creation of more green spaces. Living in a village with increasing housing stock, the need to create adequate green spaces amongst those new developments and connect them to the existing network should be given equally consideration.

Policy 02. Green spaces,

A. reference is made to a number of existing green spaces but (further to point above) there are none noted in any of the newer developments - either off Garstang Road, Station Lane and the old Boars Head site. A limitation of our ambition to protect and create more green spaces.

B. I also noted the two green spaces (with its enhanced wildflower and wild life potentials) at both the North and South entrances to the village aren't referenced. I would consider this a gap. these are green spaces which we should seek to protect too.

C. Just to note that the playing field at Barton St. Lawrence is also used by local community sports clubs for football Tournaments etc, so extends to a wider community audience than the school children themselves.

Policy 03: Active Travel, our Policy should be seeking to extend our community infrastructure. Sourcing investment and contribution form prospective developers to leave a legacy of beneficial contribution to our community.

Policy 04: New Housing,

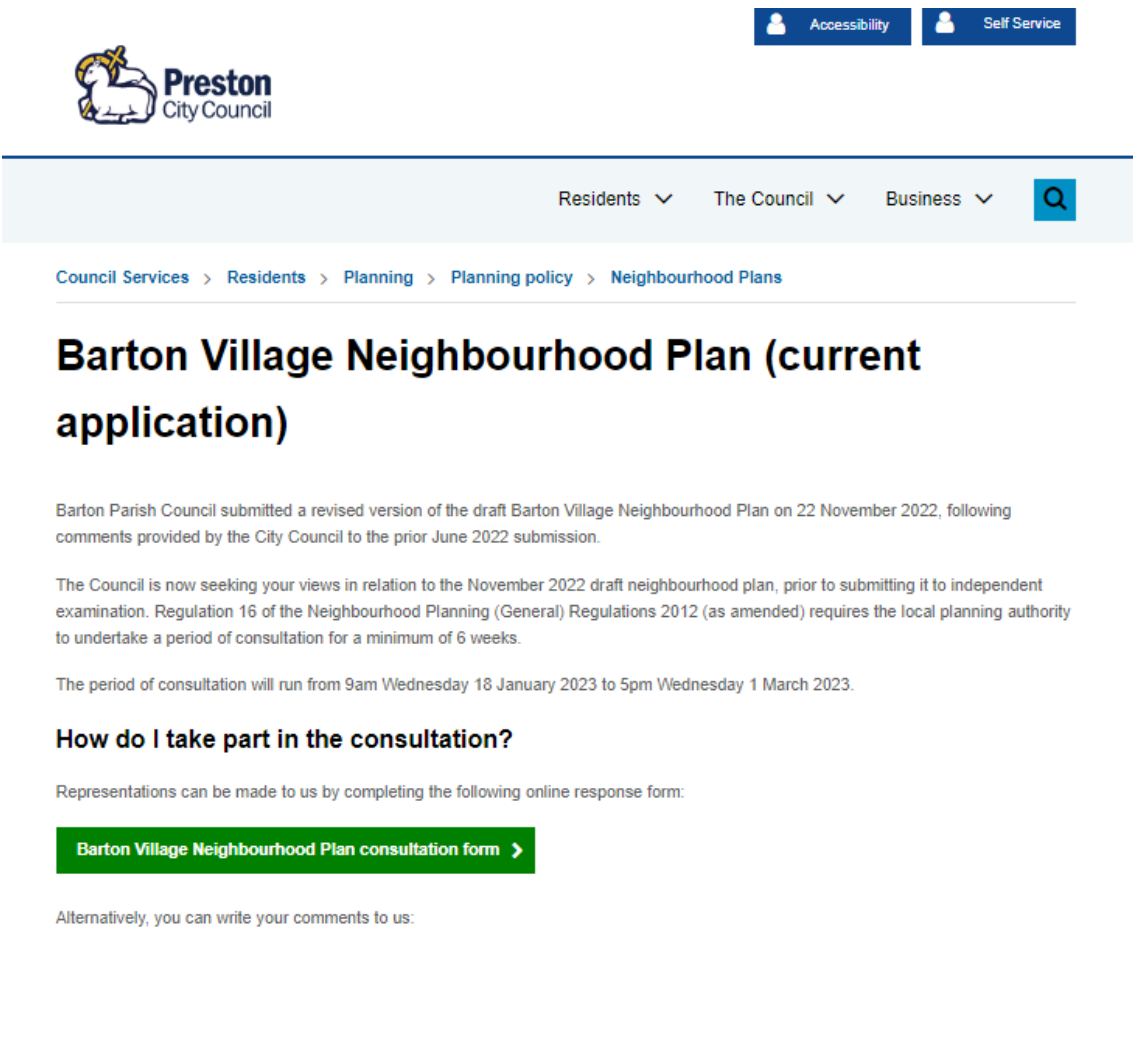
A. decisions should be driven to also meet local need. In particular the local needs of our frail and elderly to down size or enter supported living, single story dwellings and for our YP to buy their own starter home. these extend past the specifics you've drawn out in this policy, but our elderly and young people need the policies need to better support their desire to remain in the village.

B. We have seen significant development in the village in recent years, attempts to curtail developments considered detrimental to the village have failed. The local neighbourhood policies need to have teeth, how would we express over population such that the right of refusal is grounded in policy. The village has almost doubled in recent years, but without corresponding investment in infrastructure or local services. I would hope local policy would be helpful to stem the tide of growth such that the village identify isnt lost.

Policy 06, sustained Delineation, building on point 4b above, I really welcomed this attempt to maintain the village identity and its boundary. I was unclear however from the narrative whether this is being enshrined into policy or not. My reading is that attempts to gain approval to recognise a delineated area that would form the effective hard boundary (for building purposes) of the village is maintained were refused. I wholly support the policy, but unclear from the narrative whether it can be applied in practice or is being blocked for other reasons?

I appreciate at this junction changes to the Policies proposed within the plan maybe difficult to take on board, but I'm hopeful that making some adjustments will give the people of Barton greater control over planning decisions within its neighbourhood building plan. I have also posed a couple of questions, for which a response would be appreciated if that's possible.

**Table 2: Examples of Regulation 16 Consultation Undertaken (18<sup>th</sup> January – 1<sup>st</sup> March 2023)**

Description	Example
Preston City Council's Webpage	 <p>The screenshot shows the Preston City Council website. At the top right, there are buttons for 'Accessibility' and 'Self Service'. The Preston City Council logo is on the left. A navigation bar contains 'Residents', 'The Council', and 'Business' with dropdown arrows, and a search icon. A breadcrumb trail reads: 'Council Services &gt; Residents &gt; Planning &gt; Planning policy &gt; Neighbourhood Plans'. The main heading is 'Barton Village Neighbourhood Plan (current application)'. The text below states: 'Barton Parish Council submitted a revised version of the draft Barton Village Neighbourhood Plan on 22 November 2022, following comments provided by the City Council to the prior June 2022 submission. The Council is now seeking your views in relation to the November 2022 draft neighbourhood plan, prior to submitting it to independent examination. Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) requires the local planning authority to undertake a period of consultation for a minimum of 6 weeks. The period of consultation will run from 9am Wednesday 18 January 2023 to 5pm Wednesday 1 March 2023. How do I take part in the consultation? Representations can be made to us by completing the following online response form: Barton Village Neighbourhood Plan consultation form &gt; Alternatively, you can write your comments to us:'</p>

Consultation  
Letter

Date: 18-January-2022  
Our Ref: Barton Village Neighbourhood Plan  
Ask For: Shaun Knights  
Telephone: 01772 906788



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

[www.preston.gov.uk/planning](http://www.preston.gov.uk/planning)

Dear Sir / Madam

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

The Barton Parish Neighbourhood Area was formally designated as a Neighbourhood Planning Area by the City Council in September 2017.

Barton Parish Council submitted a revised version of the draft Barton Village Neighbourhood Plan on 22nd November 2022, following comments provided by the City Council to the prior June 2022 submission.

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

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) requires the local planning authority to undertake a period of consultation, for a minimum of 6 weeks. The consultation period will run from **9am Wednesday 18<sup>th</sup> January to 5pm Wednesday 1<sup>st</sup> March 2023**

Representations may be made to the Council by completing the online response form: <https://www.preston.gov.uk/bartonconsultation> or in writing to:

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

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

All representations **must be received** on or before **5pm 1<sup>st</sup> March 2023**.

The Neighbourhood Plan and associated documents (including an updated Consultation Statement and supporting documents, and a Basic Conditions Statement) are available to download on the City Council website.

Hard copies are also available upon request during normal office hours at Preston Town Hall (address as above). For further information about deposit points within the Parish, please refer to the Barton Parish Council website: [Barton Parish Council | Parish Council Lancashire | Councillor \(barton-pc.org.uk\)](http://Barton Parish Council | Parish Council Lancashire | Councillor (barton-pc.org.uk))

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

If you require any further assistance or have any questions, please contact Shaun Knights by email at [s.knights@preston.gov.uk](mailto:s.knights@preston.gov.uk) or on [01772 906788](tel:01772906788).

Yours faithfully

Planning Policy

Neighbourhood Plan - Barton Consultation  
January 2023

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**The Barton Parish Neighbourhood Area was formally designated as a Neighbourhood Planning Area by Preston City Council in September 2017.**

Following earlier consultation and comments received, Barton Parish Council submitted a revised version of the draft Barton Village Neighbourhood Plan on 22nd November 2022.

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

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

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

**Please have your say no later than  
Wednesday 1 March 2023**

[Find out more](#)

You have been sent this email as you requested local planning updates from Preston City Council

[planningpolley@preston.gov.uk](mailto:planningpolley@preston.gov.uk)

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More info:

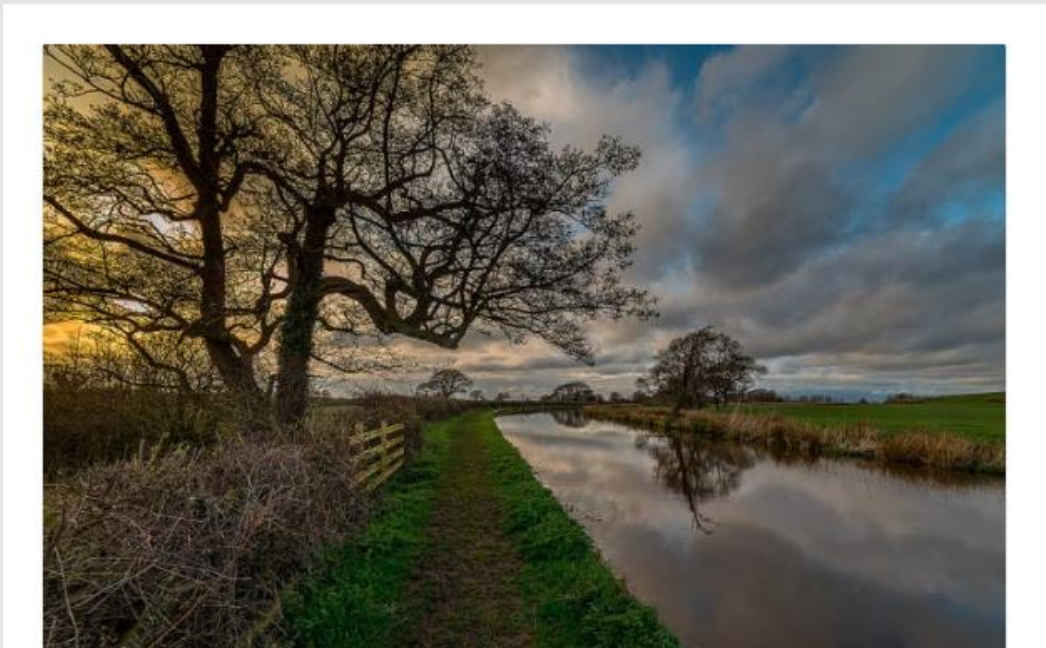
[Have Your Say](#)

This consultation is open from  
Wednesday 18th January until 5pm  
Wednesday 1st March 2023

🔗 [New date will confirm Broughton Mosque appeal decision](#) < >

## Have your say on the future of Barton Village

Posted on - 24th January, 2023 - 7:00am | Author - Kate Rosindale | Posted in - Housing, Preston Council, Preston News, Redevelopment, Wyre News



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